

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Direct )  
Energy Business, LLC and Direct Energy )  
Services, LLC for Waivers of Certain )  
Provisions of Chapters 4901:1-21 and )  
4901:1-29, O.A.C., to Permit Third-Party )  
Verification by Digital Confirmation. )

Case No. 18-0382-GE-WVR

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**INITIAL COMMENTS OF DIRECT ENERGY BUSINESS, LLC  
AND DIRECT ENERGY SERVICES, LLC**

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Direct Energy Business, LLC and Direct Energy Services, LLC (collectively, “Direct Energy”) submit these initial comments in accordance with the June 26, 2019 procedural entry.

In March 2018, Direct Energy filed an application for waivers of various provisions of Rules 4901:1-21-06(D) (“Gas TPV”) and 4901:1-29-06(D)(6) (“Electric TPV”) to give customers the option of third-party verification through a digital confirmation platform. As explained in the application, the proposed digital confirmation platform will function much like traditional voice TPV, the main difference being that the verifier’s interaction with the customer will occur through text or internet prompts rather than voice communication.

At the time Direct Energy filed its application, the company was also in the process of rolling-out digital TPV in other jurisdictions. Direct Energy is submitting these comments to apprise the Commission and interested parties of the status of this roll-out and to share “lessons learned.”

Digital TPV is currently being utilized in the following states:

<u>Jurisdiction</u>	<u>Full implementation</u>
Pennsylvania	May 2018
Michigan	August 2018
Maryland	November 2018
Delaware	January 2019

Digital TPV is accomplishing its intended purpose in each of these jurisdictions. Nearly 23,000 enrollments have been processed with digital TPV, compared to approximately 51,000 voice-based verifications. Importantly, the more efficient digital verification process has not resulted in a decline in the “quality” of enrollments. With voice-based TPV, 75% of customers ultimately verified that they wished to enroll with Direct Energy. With digital TPV, the percentage increased slightly to 78%. The similarity in outcomes (*i.e.*, percentage of customers successfully verified) between voice-based and digital TPV demonstrates that customers are not rushing through or ignoring digital verification questions or prompts.

Direct Energy’s application provided a high-level summary of the questions and prompts that would be provided to customers digitally. In addition to the geo-location and verification of the customer’s phone number, Direct Energy has since augmented the process for validating enrollments with a process that also validates the identity of the enrollee. At the beginning of the process, the customer enters their name. At the end of the process, they enter their date of birth. This information is validated by the system and compares the name and address provided by the customer with the address and phone number entered by the sales agent. The customer-provided date of birth offers additional identity validation in the event of disputed enrollments and ensures that customers undergoing verification are who they say they are.

The Commission should grant the requested waivers for the reasons explained above and in Direct Energy's application.

Date: August 8, 2019

Respectfully submitted,

/s/ Mark A. Whitt

Mark A. Whitt (0067996)

Rebekah J. Glover (0088798)

**WHITT STURTEVANT LLP**

88 E. Broad St., Suite 1590

Columbus, Ohio 43215

614.224.3946

whitt@whitt-sturtevant.com

glover@whitt-sturtevant.com

*Attorneys for Direct Energy Business, LLC  
and Direct Energy Services, LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing document is being served via electronic mail this 8th day of August, 2019, upon the following:

Terry L. Etter  
Kevin J. Moore  
Amy Botschner O'Brien  
Office of the Ohio Consumers' Counsel  
65 East State Street, 7<sup>th</sup> floor  
Columbus, OH 43215  
terry.etter@occ.ohio.gov  
kevin.moore@occ.ohio.gov  
amy.botschner.obrien@occ.ohio.gov

Joseph M. Clark  
Stephen B. Seiple  
Columbia Gas of Ohio, Inc.  
290 W. Nationwide Blvd.  
Columbus, OH 43216-0117  
josephclark@nisource.com  
sseiple@nisource.com

*/s/ Mark A. Whitt*  
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One of the Attorneys for  
Direct Energy Business, LLC and Direct  
Energy Services, LLC

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Summary: Comments electronically filed by Shelli T Clark on behalf of Direct Energy Services, LLC and Direct Energy Business, LLC