

In the Matter of the PUCO's Review of)
Chapter 4901:1-10 of the Ohio) Case No. 17-1842-EL-ORD
Administrative Code.)

August 16, 2019

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On July 17, 2019, the Public Utilities Commission of Ohio (“PUCO”) invited interested persons to file comments and reply comments concerning proposed rule changes concerning the minimum service and safety standards that Ohio’s electric utilities are required to provide to Ohio’s electric utility customers. These rules serve a critical purpose in helping promote the state policy for ensuring that consumers have adequate, reliable, safe, and efficient electric service.¹ The PUCO should adopt the recommendations of the Office of the Ohio Consumers’ Counsel (“OCC”) to improve the quality, safety, and reliability of electric service in Ohio.

A. The PUCO should amend Ohio Adm.Code 4901:1-10-01 and 4901-10-10 to adopt a definition for the term “momentary outage” and require utilities to meet reliability standards for momentary outages.

¹ R.C. 4928.02(A).

The more momentary outages, the less reliable service is to customers. The PUCO should incorporate standards in their rules to define what constitutes these outages.

In this regard, OCC proposes that the PUCO adopt a definition for the term “momentary outage” in Ohio Adm.Code 4901:1-10-01. Further, the PUCO should add new momentary outage standards in Ohio Adm.Code 4901:1-10-10.

The Institute of Electrical and Electronics Engineers (“IEEE”) generally defines “momentary outages” as interruptions of service to customers for a duration of less than five minutes.² The PUCO should include the following definition for “momentary outage” in Ohio Adm. Code 4901:1-10-01:

4901:1-10-01 Definitions.

“Momentary Outage” means an interruption in electric service with a duration less than five minutes.

Further, Ohio Adm.Code 4901:1-10-10(B) establishes service reliability indices and minimum performance standards that electric utilities must meet on an annual basis. The two reliability indices currently used in Ohio are the customer average interruption duration index (“CAIDI”) and the system average interruption frequency index (“SAIFI”). CAIDI represents the average time to restore service following an interruption. SAIFI represents on an annual basis the average number of interruptions per customer. Both indices are critical in establishing minimum benchmark reliability standards in the state.

However, SAIFI and CAIDI alone are not indicators of the number of interruptions customers experience or the duration of those interruptions. The SAIFI and CAIDI reliability performance standards are more reflective of the normal day-to-day

² IEEE Guideline for Electric Power Distribution Reliability Indices, IEEE Std 1366-2012, May 31, 2012.

operations of the distribution system or “blue sky standards” when the operational limits of the system are not being stressed due to inclement weather or other factors. As a result, the impacts of certain major outages and non-sustained outages are not reflected in the existing standards. Accordingly, the PUCO should adopt a Momentary Average Interruption Frequency Index (“MAIFI”) and a System Average Interruption Duration Index (“SAIDI”). MAIFI is an indication of the average frequency of momentary interruptions in service.³ SAIDI provides an indication of the total duration of interruptions for the average customer during a predefined period of time. The PUCO currently requires the use of the SAIDI for calculating on a circuit by circuit basis the eight percent worse performing circuits.⁴

The PUCO has previously affirmed that momentary interruption data through MAIFI and SAIDI can be helpful and useful in assessing the reliability of electric service.⁵ However, the PUCO expressed concern that the time was “not ripe” for implementing momentary standards given the lack of uniformity in collecting data.⁶

The time is now ripe to implement these proposed momentary interruption standards. Ohio’s electric utilities propose charging customers and spending billions of dollars on grid-modernization under the premise that such spending will improve reliability. The deployment of advanced metering infrastructure (“AMI”) and communications infrastructure at the home, distribution automation, additional line sensors, and enhancements in distribution substations is supposed to provide up to the

³ IEEE Guide for Electric Power Distribution Reliability Indices, IEEE Std. 1366-2012 (Revision of IEEE Std. 1366-2003) at 9.

⁴ Ohio Adm. Code 4901:1-10-11.

⁵ *In re Commission’s Review*, Case No. 06-653-EL-ORD, Finding and Order (Nov. 5, 2008) at 14.

⁶ *Id.*

minute information about the service quality and reliability customers are experiencing. Now is the time to adopt standards to measure distribution system reliability, so that the PUCO and stakeholders can analyze the value to customers of the billions of dollars that could be spent on grid modernization. Momentary outages should no longer be excluded from the annual reliability reports. OCC recommends that the following amendments to the PUCO's rules be adopted to implement MAIFI and SAIDI reliability standards:

4901:1-10-10 Distribution System Reliability.

(10)(B) Service reliability indices and minimum performance standards.

(1) The service reliability indices are as follows:

“MAIFI” or the Momentary Average Interruption Frequency Index represents the average frequency of momentary interruptions. MAIFI is expressed by dividing the total number of momentary customer interruptions by the total number of customers served.

“SAIDI” or the System Average Interruption Duration Index represents the total duration of interruptions for the average customer of a predefined basis. SAIDI is expressed by dividing the sum of all customer minutes of interruption by the total number of customers served.

Additionally, Ohio Adm.Code 4901:1-10-10(C)(1) requires the electric utilities to file an annual report with the PUCO by March thirty-first of each year concerning reliability performance.⁷ To recognize the additional momentary outage standards, OCC recommends the following amendment to the rule:

4901:1-10-10 Distribution System Reliability.

(C)(1) Annual performance and supporting data for each service reliability index set forth in paragraph (B) of this rule both

⁷ Ohio Adm. Code 4901:1-10-10(C)(1).

with and without exclusions for major events and transmission outages. Supporting data includes, for example, the number of customers served, the number of customer interruptions, the number of customer minutes interrupted, the number of momentary interruptions, SAIFI data for a major event, CAIDI data for a major event, SAIDI data for a major event, information concerning a transmission interruption, and a listing of distribution circuits interrupted during a transmission interruption.

Finally, Ohio Adm.Code 4901:1-10-10(D) requires the electric utilities to submit an action plan to the PUCO Staff if the electric utility fails to meet any of the reliability indices in a year. Considering that the annual report is publicly filed by March 31 of each year,⁸ the action plan should be included with the filed report. Knowing that the electric utility missed a performance standard is meaningless if additional information about what the utility is doing to correct the situation is not provided. Further, other stakeholders must rely on public records requests to the PUCO in order to receive information that should be publicly filed. This process unnecessarily expends time for the stakeholders and PUCO Staff. Consequently, OCC recommends that the PUCO amend Ohio Adm.Code 4901:1-10-10(D) as follows:

4901:1-10-10 Distribution System Reliability.

- (D) If the annual performance of an electric utility does not meet the electric utility's performance standard for any index, the electric utility shall file an action plan with the annual report. Status reports on each action included in the action plan shall be quarterly filed with the commission. ~~submit an action plan to the director of the service monitoring and enforcement department, by March thirty-first of the same year following the year the standard was missed.~~

⁸ Ohio Adm. Code 4901:1-10-10(D).

The PUCO would encourage more reliable electric utility service for customers by adopting these additional system reliability standards. If utilities are going to charge customers and spend billions of dollars on distribution infrastructure modernization, as the utilities have proposed to do, then customers should see commensurate reliability benefits.

B. The PUCO should reject the PUCO Staff's proposal to limit the publishing of company-specific minimum distribution reliability performance standards and the actual performance data.

The PUCO Staff proposed amending Ohio Adm. Code 4901:1-10-10(B)(2) to limit the amount of reliability performance data that it makes available to the public on the PUCO website. The PUCO Staff has maintained the company-specific reliability standards and performance on the PUCO website since the standards were initiated in 2010. According to the PUCO Staff proposal, the only information that would be available on the website is the current company-specific minimum reliability performance standard and the actual performance over the previous two years.⁹

Having the reliability performance data and standards on the PUCO website provides the public with direct access to the information they may need to assess how the utilities' reliability performance has changed over time. Limiting public access to two years of data, when data is available for a much longer period of time (since 2010), makes little sense. Having only two years of reliability performance data available on the PUCO website is insufficient for Ohioans to assess if their reliability performance has gotten better or worse over time.

⁹ See Letter filed by PUCO Staff in this case on July 25, 2019.

Considering that the utilities charge customers millions of dollars each year for grid modernization, capital spending, and tree-trimming under the premise of improving reliability, the public should have readily available access to reliability performance data over a longer period of time. The PUCO should reject the PUCO Staff's proposal to limit public access to reliability data and continue the annual reporting of the company-specific reliability on the PUCO website, just as the PUCO has done since the standards were established in 2010.

C. The PUCO should amend Ohio Adm.Code 4901:1-10-05 to require at least four actual meter reads per year.

The PUCO's rules, at Ohio Adm.Code 4901:1-10-05(I), require electric utilities to perform an actual meter read of each meter at least once each calendar year. To satisfy the current rule, meter readings taken by electronic means, such as for AMI meters, are considered actual meter readings. However, not every customer has an AMI meter. For those customers that have a mechanical meter, the rule requires electric utilities to "make reasonable attempts" to obtain accurate, actual meter reads for each billing period.¹⁰ The standard of "reasonable attempts" is overly subjective and can result in situations where mechanical meters are not actually read by the utility for a long time. In such situations, customers may be overcharged or undercharged for their actual usage.

The PUCO should adopt the following amendment to Ohio Adm.Code 4901:1-10-05(I)(1):

4901:1-10-05 Metering.

(I)(1) The electric utility shall attempt to obtain actual readings of all its in-service customer meters every billing period, but must obtain an actual read a minimum of four times per

¹⁰ Ohio Adm. Code 4901:1-10-05(I)(1).

~~year per customer, at least once each calendar year. Every billing period, the electric utility shall make reasonable attempts to obtain accurate, actual readings of the energy and demand, if applicable, delivered for the billing period, except where the~~ The customer and the electric utility can have agreed to less frequent meter reads provided each meter is read at least once annually. ~~other arrangements.~~ Meter readings taken by electronic means shall be considered actual readings.

A standard for actual monthly meter reads by the electric utilities should be adopted because customers have a right to be billed accurately¹¹ and for only the amount of electricity that was used. Situations where the customer and utility agree to less frequent meter reads can be addressed by separate agreement as currently contemplated in the rules. Further, the billions of dollars that the electric utilities want to spend on grid-modernization and advanced metering infrastructure should result in more accurate and frequent meter reads without undue additional burden.

D. The PUCO should amend Ohio Adm.Code 4901:1-10-08 to protect customers in the event of an outage.

The PUCO's rules, at Ohio Adm.Code 4901:1-10-08(A), require each of the electric utilities to maintain emergency plans that outline an extensive list of requirements involving the plans, policies, and procedures for performing damage assessments, planning for additional resources, restoration priorities, coordination with emergency resources, outage updates, and after-action assessments following activation of the emergency plan. Thereafter, Ohio Adm.Code 4901:1-10-08(B) requires the electric utilities to make the emergency plan available to the PUCO outage coordinator for review. However, there is no requirement that the electric utilities specifically identify the circumstances when the emergency plan(s) will be implemented. There should be.

¹¹ Ohio Adm. Code 4901:1-10-22(B).

Further, the emergency plans should be kept on-site at the PUCO—and not just be available for review at the utility’s offices—for ease of reference and efficiency in the state regulator’s (PUCO) work on emergency issues. Under the current rules, electric utilities are not required to keep an updated emergency plan at the PUCO offices.

Accordingly, the PUCO should adopt the following changes:

4901:1-10-08 Electric utility emergency plans and coordination for restoration of electric service.

- (A)(1) A table of contents, mission statement, ~~and~~ major objectives for the plan, and the circumstances that warrant implementation of the plan(s).

* * *

- (B) Each electric utility shall provide ~~make~~ its emergency plan and amendments ~~available for review by to the~~ commission’s outage coordinator. In the emergency plan provided ~~made available~~ to the commission’s outage coordinator, the electric utility may redact the following confidential information:

Thereafter, Ohio Adm.Code 4901:1-10-08(I) requires the electric utilities to annually verify and update their lists of “critical” customers, that is, customers who have immediate life-threatening needs. With only one annual update, the lists could quickly become outdated and not reflective of the current needs of customers. Additionally, the rules do not require the electric utilities to provide notice to persons that provide care to critical customers about scheduled outages or to provide a priority response to restore outages for critical customers. Each electric utility should have this responsibility.

Accordingly, the PUCO should amend Ohio Adm.Code 4901:1-10-08(I) as follows:

4901:1-10-08 Electric utility emergency plans and coordination for restoration of electric service.

- (I) Each electric utility shall:

- (1) ~~Maintain and annually verify and update its a~~ list of critical customers updated and verified at least on a quarterly basis.

* * *

- (4) Maintain contact information for persons that provide care for critical customers and inform them during planned and sustained outages.
- (5) Provide a priority response to restore service for critical customers following sustained outages.

The PUCO should protect utility customers (especially critical customers) by safeguarding that electric utilities and the PUCO Staff have the important consumer-specific information they need during an outage.

E. The PUCO should amend Ohio Adm.Code 4901:1-10-11 to improve access to information on reliability and enforcement on failure to meet reliability standards.

The PUCO rules, at Ohio Adm.Code 4901:1-10-11(C)(1), require the electric utilities to submit reports with the eight percent worst performing circuits to the director of the Service Monitoring and Enforcement Department within 90 days following the end of the annual reporting cycle.¹² Annual reporting cycles are typically from September first each year to August 31.

OCC, the representative of Ohio residential consumers, also uses the reports with the eight percent worst performing circuits for analysis related to the reliability of service being provided to residential customers. But OCC must rely on obtaining copies of the report through public records requests. This is inefficient and administratively burdensome for both OCC and the PUCO. Rather than file public records requests for this public information, the PUCO should

¹² Ohio Adm. Code 4901:1-10-11(C)(1).

make this information publicly available. Accordingly, the PUCO should amend the rule to require electric utilities to file the annual report with the eight percent worst performing circuits in a PUCO docket. The PUCO should adopt the following amended rule:

4901:1-10-11 Distribution Circuit Performance.

(C)(1) Each electric utility shall ~~file with the commissions submit,~~ no later than ninety days after the end of its reporting period, a report ~~to the director of the service monitoring and enforcement department~~ that identifies the worst performing eight per cent of the electric utility's distribution circuits during the previous twelve-month reporting period.

Thereafter, Ohio Adm.Code 4901:1-10-11(F) establishes a process where any circuit listed for three consecutive years in the annual report with the eight percent worst performing circuits is determined to be a violation of the rule. Under this rule, customers are subject to poor reliability performance for three years before a compliance action under Ohio Adm.Code 4901:1-10-30 may be initiated by the PUCO. That is unreasonable. Compliance actions should be required after two years.

And the reliability performance during major events and transmission outages are excluded from calculations of circuit performance.¹³ Therefore, the number of outages and duration of outages can be substantial for customers served by these inferior circuits.

Electric utilities recover their costs related to investments and expenses through rates that are charged to customers – including those served by the worst

¹³ Ohio Adm. Code 4901:1-10-11(B)(1).

performing circuits. The electric utilities should be required to prioritize the necessary improvements for these circuits such that the performance and reliability is improved the following year. OCC proposes that the rule be amended to designate a two-year period for circuits to be improved and subsequently removed from the eight percent worst performing circuit reports as follows:

4901:1-10-11 Distribution Circuit Performance.

- (F) Electric utilities shall take sufficient ~~corrective~~ remedial action to make sure that ~~no customers are not being served by a circuit that~~ is listed on three-two consecutive reports. The inclusion of a given circuit in the report under paragraph (C) of the rule for ~~three-two~~ consecutive reporting periods shall create a rebuttable presumption of a violation of this rule.

Customers pay for reliable electric utility service. Electric utilities should take corrective action, when necessary, to ensure that circuits are being upgraded and improved to give customer the reliable service they deserve, especially if the electric utilities propose to spend billions of dollars on grid modernization.

F. The PUCO should amend Ohio Adm.Code 4901:1-10-12 to provide customers more information regarding their electric utility service.

The PUCO's rules, at Ohio Adm. Code 4901:1-10-12, require each electric utility to have a written summary of customer rights and obligations. This is an important document that helps customers better understand their rights as Ohio residential utility consumers. However, many improvements are needed to provide better information to consumers. For example, the electric utilities are only required to provide customers with this information when they initially apply for service, and thereafter only upon request.

Existing customers may not be aware that they must make subsequent requests to obtain this information.

For this reason, OCC recommends that the customer rights and obligations be provided in written form to all customers when they initially apply for service, annually thereafter, and on the PUCO's website. The information could be provided in conjunction with bills to help reduce postage expense. OCC recommends the following language be adopted by the PUCO:

4901:1-10-12 Provision of Customer Rights and Obligations.

Each electric utility shall provide to new customers, upon application for service, and TO existing customers upon request, or in an annual bill insert, a written summary of their rights and obligations under this chapter. ***

Paragraph D requires the electric utilities to have a statement in the customer rights and obligations that customers may contact the electric utility to obtain additional information about alternative rates and service options. While this rule is appropriate, it is limited to the extent that customers must inquire about the alternative rates and service options. OCC proposes the following language:

4901:1-10-12 Provision of Customer Rights and Obligations.

(D)(2) A statement that the electric utility will inform customers about alternative rates and service options and how to obtain details about the programs. ~~upon inquiry by a customer regarding rates or energy efficiency, the electric utility will disclose to the customer the existence and availability of the electric utility's alternative rates or any other energy efficiency programs.~~

The PUCO should adopt OCC's proposed amendments to Ohio Adm.Code 4901:1-10-12 to protect consumers and ensure that consumers are properly informed of utility rate and service options.

- G. The PUCO should amend Ohio Adm.Code 4901:1-10-22 to require that all riders are identified on customer bills separate from base rates and provide customers additional information regarding their bills for electric service.**

Ohio law requires that customers be provided, to the extent possible, a separate listing of each service component on the bill so that customers can recalculate their bill for accuracy.¹⁴ However, the number of riders and phase-in recovery charges included on customer bills makes independently verifying a customer's bill nearly impossible. To provide transparency to consumers, and comply with R.C. 4928.10(C)(2), the PUCO should require each electric utility to separately itemize the rider charges that customers pay. The PUCO should amend Ohio Adm.Code 4901:1-10-22 as follows:

4901:1-10-22 Electric Utility Customer Billing and Payments.

(B)(26) Any charges to customers for riders shall be listed separate from base rate charges.

Further, while listing every rider may be unreasonable (unfortunately, due to the significant number of riders), the PUCO should identify a dollar per month threshold that if exceeded must be shown by line-item on customer bills. For example, the PUCO could require that every electric utility customers' bill show by separate line-item all riders exceeding \$1.00 per month for the average (1,000 kw/h/mo.) residential customer. The PUCO could also require the disclosure of the costs for riders that are supposed to provide direct reliability benefits to consumers such as distribution infrastructure modernization riders, grid modernization riders, and tree-trimming riders on monthly bills.

¹⁴ R.C. 4928.10(C)(2).

Further, Ohio Adm.Code 4901:1-10-22(B)(23) requires the electric utilities to provide the preceding 12 months of usage history on the bill along with the total and average consumption over that time. However, electric utilities are not required to provide the total cost paid by customers over the preceding 12 months. Customers would benefit from having their total electric costs for the preceding 12 months displayed on the bill. This information can help consumers better manage budgets and can be helpful in evaluating potential energy savings. OCC recommends the following be added to the rule:

4901:1-10-22 Electric Utility Customer Billing and Payments.

(B)(24) The total annual costs for electricity and the total annual bill.

Finally, the PUCO should adopt a rule requiring electric utilities to record shadow-billing data and make such information available to the PUCO, OCC, and the general public. Shadow-billing data compares the difference between the electric utility's standard service offer (SSO) and the rates charged by competitive retail electric service providers to determine the total savings or spending by shopping for generation service from an electric marketer. The PUCO should adopt the following rules:

4901:1-10-22 Electric Utility Customer Billing and Payments.

(J) For each electric utility customer shopping with a competitive retail electric service provider, the electric utility shall create a bill as if that customer were on the electric utility's standard service offer. Each electric utility shall annually file a report with the commission detailing the total customer savings or spending by shopping with competitive retail electric service providers.

The PUCO should adopt OCC's proposed amendments to Ohio Adm.Code 4901:1-10-22 to provide customers more information regarding their bills for electric utility service.

H. The PUCO should reject the PUCO Staff’s proposed amendments to Ohio Adm.Code 4901:1-10-22(C) and 4901:1-10-33(F) associated with prepaid electric service.

The PUCO should reject the PUCO Staff’s proposed amendments to Ohio Adm.Code 4901:1-10-22 and 4901:1-10-33 regarding prepaid service. Prepaid service involves customers paying for their electric service before the services are used, rather than by bill after the services are used. Prepaid services are enabled through AMI or (“smart meter”) two-way communications technology that are being deployed across the state. Because those customers would pay for service before it is used, prepaid service customers do not receive a bill from their electric utility. So any rules regarding prepaid service do not belong in the PUCO’s billing rules. More importantly, the PUCO Staff’s proposals for prepaid service would violate Ohio law by eliminating the rights and protections afforded to consumers under Ohio law. For example:

- Prepay services lack the 14-day advanced notice requirements before services are shut off under R.C. 4933.122.
- Prepay services lack the additional ten-day notice requirements afforded under Ohio law for protecting customers during the winter heating months.¹⁵
- Prepay services lack the special protections provided to active military personnel to prevent shut-off of services.¹⁶
- Prepay services lack the advanced notice requirements for tenants who pay their utilities to landlords along with rental payments.¹⁷

¹⁵ R.C. 4933.12(D).

¹⁶ R.C. 4933.12(F).

¹⁷ R.C. 4933.12(C)(2).

- Prepay services lack protections for consumers to dispute the reasons why their services are terminated.¹⁸
- Prepay services lack the essential consumer protections in Ohio law to protect Ohioans from shutoffs when it would be especially dangerous to health or would make operation of life support equipment impossible or impractical.¹⁹
- Prepay services lack the rights that customers have to payment plans and other remedies to avoid loss of service, denial of low-income access to the federal Home Energy Assistance Program (HEAP), and other bill payment assistance programs and the PIPP program.

The PUCO should reject the PUCO Staff's proposal to include a new section in the rules for prepaid electric service.

I. The PUCO should amend Ohio Adm.Code 4901:1-10-24 to require Ohio's electric utilities to each conduct a privacy assessment to ensure the PUCO's rules and the utilities' policies are adequately protecting customer information.

The PUCO rules, at Ohio Adm.Code 4901:1-10-24(E)(3) prohibit electric utilities from disclosing customer energy usage data without the customer's written consent.

Customer energy usage data is different from other types of customer account information. With AMI and grid-modernization efforts, electric utilities can have access to customer's usage patterns with a level of granularity that has never been available before. Combining this granular usage information with personal identity information (which utilities collect about their customers) creates the potential for privacy violations.

¹⁸ R.C. 4933.122(B).

¹⁹ R.C. 4933.122(C).

Electric utilities that have implemented AMI and grid-modernization should be required to conduct privacy assessments to safeguard protection of customer privacy. This type of assessment should be performed (and periodically updated) as a condition for any customer energy usage data or “de-identified energy data” to be disclosed outside of the electric utility.

4901:1-10-24 Customer Safeguards and Information

(F)(6) Each electric utility shall annually hire an independent auditor to conduct a privacy assessment and file a report with the commission detailing the results of the assessment.

The PUCO should require each electric utility to hire an independent auditor to audit the privacy policies and practices at each electric utility in Ohio. The independent auditor should then be required to file its report in a public docket so that the public can see how its privacy is being protected.

J. The PUCO should amend Ohio Adm.Code 4901:1-10-27 to require each electric utility and transmission owner to publicly file reports regarding reliability.

The PUCO rules, at Ohio Adm.Code 4901:1-10-27(C)(2), currently require each electric utility or transmission owner to submit a report to the PUCO that identifies the performance of each transmission circuit for the previous year. Presently, OCC must request copies of this report from the PUCO through public records requests. This is inefficient and administratively burdensome for both OCC and the PUCO. Instead, these reports, which contain public information, should be made publicly available by requiring the electric utilities to file the reports in a PUCO docket. OCC recommends that the rule be modified, as follows, so that a copy of the annual report is publicly filed:

4901:1-10-27 Inspection, Maintenance, Repair, and Replacement of Transmission and Distribution Facilities (Circuits and Equipment).

- (C)(2) Each electric utility or transmission owner shall ~~submit a report on electronic media in a format prescribed by the PUCO~~ file a report with the commission on or before March thirty-first of each year, that identifies the performance of each transmission circuit for the previous calendar year. Each annual report shall, at a minimum, provide the following information for each transmission circuit: . . .

Further, Ohio Adm.Code 4901:1-10-27(D)(4) requires each electric utility or transmission owner to submit a report to the PUCO that concerns compliance with the inspection schedule from the previous year. OCC must also obtain these reports by requesting copies from the PUCO through public records requests to assess the reliability of service provided to consumers. As noted above, this is inefficient and administratively burdensome for both OCC and the PUCO. OCC recommends that the rule be amended, as follows, so that a copy of the annual report is publicly filed in a PUCO docket:

4901:1-10-27 Inspection, Maintenance, Repair, and Replacement of Transmission and Distribution Facilities (Circuits and Equipment).

- (D)(4) On or before March thirty-first of each year, each electric utility and transmission owner shall ~~submit~~ file a report ~~in an electronic medium, in a format prescribed by the PUCO or its staff, or~~ with the commission describing the electric utility's and/or transmission owner's compliance with the inspection schedule in paragraphs (D)(1) to (D)(3) of this rule for the preceding calendar year. The annual report of inspection compliance shall include: . . .

The PUCO should adopt OCC's proposed amendments to Ohio Adm.Code 4901:1-10-27 for adequate reporting and monitoring of electric utility reliability.

II. CONCLUSION

OCC appreciates the opportunity to provide these comments regarding the proposed rule amendments regarding electric service in Ohio Adm.Code Chapter 4901:1-10. The PUCO's rules should enhance Ohio law that establishes minimum standards "for the protection of consumers in this state." Revisions are needed to the rules for the protection of consumers. OCC's recommendations in these comments will help promote reliable electric utility service and keep customers better informed of their utility service.

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CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Comments upon the following via electric transmission, this 16th day of August 2019.

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Summary: Comments Comments on Amendments to PUCO Rules to Better Protect Consumers by the Office of the Ohio Consumers' Counsel electronically filed by Ms. Deb J. Bingham on behalf of McKenney, Bryce