

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of :
Duke Energy Ohio, Inc., for Bill Format : Case No. 19-1593-GE-UNC
Approval :
:

**COMMENTS
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF
OHIO**

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November 6, 2019

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INTRODUCTION

On August 27, 2019 in Case No. 19-1593-GE-UNC, Duke Energy Ohio (Duke or Company) filed an application to update the Company's bill format. On October 4, 2019, Duke filed a clarification to the sample bill formats (hereinafter referred to as the clarification). On October 10, 2019, the Attorney Examiner issued an entry suspending the automatic approval process to provide the Commission and Staff with additional time to review the application. On October 23, 2019, the Attorney Examiner issued a procedural schedule for final comments.

BACKGROUND

Duke has been meeting with the Public Utilities Commission of Ohio Staff (Staff) on updating the bill format since October 2018. Duke and Staff have had several discussions prior to the filing of the application.

In addition, on October 4, 2019, in Case No. 19-1863-EL-WVR, Duke filed a request for waiver of three bill format administrative rules namely, Ohio Adm.Code §4901:1-10-22(B)(3), (B)(5), and (B)(8). Ohio Adm.Code §4901:1-10-22(B)(3) requires the inclusion of a local telephone number for emergencies on consolidated bills. Ohio Adm.Code §4901:1-10-22(B)(5) requires verbatim text to be included on the bill for contacting the Public Utilities Commission of Ohio or the Office of Consumers Counsel if a customer's complaint is not resolved. Ohio Adm.Code §4901:1-10-22(B)(8) requires the inclusion of beginning and ending meter reads on a consolidated bill.

COMMENTS

Upon review of the documents in Case No. 19-1593-GE-UNC, Staff does not oppose Duke's application for modification filed on October 4, 2019 with the bill format clarifications. However, Staff does have one outstanding bill format concern regarding the disconnection notice filed with the clarification. The proposed disconnection notice does not separate the amount due for disconnection by utility type (electric or natural gas). The Company has expressed to Staff its intent to update this notice in a subsequent bill format update in 2022. Although Staff would ultimately like the gas and electric amount subject to disconnection to be separate on the disconnection notice, Staff recognizes that Duke intends to make subsequent changes to its billing system in 2022. At such time, Staff recommends that Duke make Staff's recommended changes to separate the gas disconnection amount from the electric disconnection amount on the disconnection notice. Although Ohio Adm.Code 4901:1-18-06 (I) does not require

disconnection notices to be filed with the Commission but rather submitted to Staff for review, Staff requests that a revised disconnection notice be filed in the docket by the end of 2022 with Staff's recommended changes.

Finally, Staff understands that Duke's proposed current bill format is also contingent upon approval of the above-mentioned waiver case. Staff has one clarification regarding the proposed waiver of Ohio Adm.Code §4901:1-10-22(B)(8). After discussions with Staff, the Company stated that the waiver of the beginning and ending meter reads on the consolidated bill will be applied to time-of-use customers only. Customers not on a time-of-use rate will have the beginning and ending meter reads included on their bills.

STAFF RECOMMENDATION

Staff has the following recommendations:

1. The Commission approve the bill format filed by Duke in Case No. 19-1593-GE-UNC, contingent upon approval of the waiver in the above-mentioned waiver case.
2. Staff recommends that if the Commission does not approve or modifies Dukes wavier request, that Duke be required to fill corrected bill formats to comply with Commission rules.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Andrew B. Shaffer

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Staff Comments** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following Parties of Record, this 6th day of November, 2019.

/s/ Andrew B. Shaffer

Andrew B. Shaffer

Assistant Attorney General

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Summary: Comments Submitted on Behalf of the Staff of the Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO