



Public Utilities Commission

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Commissioners

M. Beth Trombold
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Dennis P. Deters
Daniel R. Conway

FILE

November 15, 2019

RE: Case No. 19-1863-EL-WVR

Public Utilities Commission of Ohio
180 E. Broad Street
Columbus, OH 43215

Dear Sir/Madam:

This letter is submitted on behalf of the Staff of the Public Utilities Commission of Ohio (Staff) regarding the Duke Energy Ohio, Inc. (Duke) request for waiver of specific sections of the Ohio Administrative Code (Ohio Adm.Code) in Case No. 19-1863-EL-WVR. The waiver requests coincide with bill format revisions in Case No. 19-1593-GE-UNC.

Duke's request for waiver of administrative rules pertain to electric and gas utility billing requirements or bill formats. Ohio Adm.Code §4901:1-10-22(B)(3) requires electric utility bills to include the utilities local and toll-free telephone numbers for reporting service emergencies. Ohio Adm.Code §4901:1-13-11(B)(3) requires natural gas utility bills to include the utilities local or toll-free telephone numbers for reporting service emergencies. The optionality to provide a local or toll-free telephone number in the natural gas billing rule does not exist in the electric bill format rule. Staff does not believe that the lack of a local phone number for reporting emergencies impairs customer's ability to reach the company for emergencies.

Ohio Adm.Code §4901:1-10-22(B)(5) requires electric utility bills and Ohio Adm.Code §4901:1-13-11(B)(5) requires natural gas utility bills to include verbatim text regarding contacting the Public Utilities Commission of Ohio (PUCO) or the Office of consumers' counsel (OCC) if a customer's complaint to the utility is not resolved. Duke's waiver request is to bifurcate the text from the phone numbers to keep consistency in the look of the new bill format. Staff does not believe that the bifurcation of the text from the telephone numbers would impair consumer's ability to contact the PUCO or OCC.

Ohio Adm.Code §4901:1-10-22(B)(8)(a) and (b) require electric utility bills to include the billing determinants: beginning meter reading and ending meter reading respectively. Duke has clarified to Staff and in Duke's comments in Case No. 19-1593-GE-UNC that the waiver of beginning and ending meter readings is limited to interval-billed rates. Staff agrees with Duke that the beginning and ending meter reading determinants no longer provide the time differentiated rate customers with relevant determinants.

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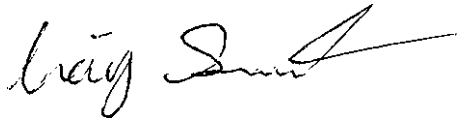
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Staff's review of the Duke's waiver request finds these requests to be reasonable. Staff recommends the Commission grant the requested waivers of Ohio Adm.Code §4901:1-13-11(B)(5), Ohio Adm.Code §4901:1-10-22(B)(3) and (B)(5) provisions. Staff recommends the waiver of Ohio Adm.Code §4901:1-10-22(B)(8) be granted only for bills containing interval-billed rates.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig Smith", with a long horizontal flourish extending to the right.

Craig Smith
Reliability and Service Analysis Division
Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, OH 43215