

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Operations of Vectren)	
Energy Delivery of Ohio, Inc. During the)	Case No. 20-0649-GA-UNC
Declared State of Emergency and Related)	
Matters.)	

**MOTION FOR SUSPENSION OR MODIFICATION
AND MEMORANDUM IN SUPPORT
OF VECTREN ENERGY DELIVERY OF OHIO, INC.**

I. INTRODUCTION

In accordance with the Commission’s Entries dated March 12, 13, and 20, 2020 in Case No. 20-591-AU-UNC (the Entries), Vectren Energy Delivery of Ohio, Inc. (VEDO), a CenterPoint Energy Company, respectfully requests the Public Utilities Commission of Ohio (Commission) to issue an order authorizing VEDO to suspend or modify the policies and practices identified herein and granting any waiver of any Commission rule, tariff requirement, or other policy or requirement that may be applicable to such policies or practices, for the duration of the state of emergency in Ohio, as commenced under Executive Order 2020-01D.

II. DISCUSSION

In the Entries, the Commission instructed public utilities to “promptly seek any necessary approval, for the duration of the emergency, to suspend otherwise applicable requirements that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact.” March 12, 2020 Entry ¶ 7(b); *see also* March 13, 2020 Entry ¶ 6(b); March 20, 2020 Entry ¶ 11.

VEDO believes that the policies and practices identified herein should be suspended or modified to comply with the Commission’s Entries. As the response to COVID-19 continues to evolve, additional changes and modifications may follow, and certain changes and modifications

discussed herein may be subject to delay or unintentional exceptions in implementation. To the extent the Commission has any concerns with any of the actions or limitations identified herein, VEDO is ready to discuss such concerns with Staff and explore appropriate modifications.

A. Limitations on field activities

To minimize unnecessary social contacts while ensuring the continuity of safe and reliable service, VEDO intends to limit field activities to the following:

- Emergency response;
- New service requests and reconnections;
- Service disconnections requested by the customer or when necessary for safety reasons;
- Bare steel and cast iron (BSCI) replacement, distribution modernization and public improvement, construction, maintenance and inspection work that would not result in a service interruption;
- Grade 3 leak repair that would not result in a service interruption; and
- Additional work performed by contractors to alleviate an emergency and/or reduce public safety risks.

Although some of the foregoing activities may require entry into the customer's premises, VEDO deems these activities to be critical to maintain or reconnect natural gas service or for the safety and reliability of its natural gas systems.

These limitations, however, may require VEDO to forgo actions otherwise required by rule, tariff provision, or generally applicable policies and practices. Such activities may include, but may not be limited to, meter testing, in-person actual meter readings of non-AMR/ERT meters, meter relocations, service upgrades, customer meetings, and others. Specifically, consistent with the Commission's March 20, 2020 Entry, for non-AMR/ERT meters located inside a customer's home or similar location that may create unnecessary COVID-19 risks associated with social contact, VEDO has suspended all in-person, actual meter readings for any

purpose, including actual meter readings to initiate or terminate service. ¶ 9. Additionally, under the present circumstances, VEDO may experience an increase in customer interactions or requests, a decrease in the availability of resources, or both. This could affect VEDO's ability to meet certain performance requirements under the Commission's rules, such as average speed of answer, timing of reconnections and new-service installations, and similar issues.

VEDO is also exploring the limitation of certain activities under its current demand-side-management (DSM) programs for the purpose of reducing social contact. Specifically, consistent with the Commission's March 20, 2020 Entry, VEDO has suspended all VEDO activity related to its in-home energy efficiency (EE) programs, including weatherization programs, and inspections, except for the processing of rebates or activity deemed necessary to alleviate an emergency for low-income customers and/or reduce public safety risks. ¶ 10. VEDO intends to discuss any additional suspensions of EE measures with vendors for its current DSM programs and with the Commission's Staff.

Therefore, to the extent the foregoing process changes prevent, limit, or delay the performance of obligations under the Commission's rules, VEDO's tariffs, or any other applicable policy or practice, VEDO requests a waiver of such requirements, including but not limited to the rules set forth in the Appendix A to this Motion. VEDO requests such waiver for at least the duration of the emergency and to the extent the foregoing limitations cause VEDO to fail to comply with any ongoing, regular, or annual requirements that may be in effect after the emergency (*e.g.*, the requirement to obtain one actual meter reading per year, average speed of answer, etc.).

B. Suspension and adjustment of disconnection and reconnection activities

VEDO has already suspended all service disconnections for nonpayment, and for failure to comply with Percentage of Income Payment Plan (PIPP) requirements (*e.g.*, to remain current

at the anniversary date or to timely reverify eligibility). VEDO decided to suspend disconnections prior to learning of the Commission's request to do so to support its customers.

In addition, residential customers previously disconnected due to nonpayment may contact VEDO for assistance reconnecting service. This assistance may require waiver of reconnection fees for customers unable to pay. VEDO is also waiving late-payment fees at this time, and VEDO may also suspend or waive other payment, application, or verification requirements as appears necessary to ensure service continuity or to eliminate service-restoration hardships, including requirements applicable to PIPP customers.

To the extent VEDO's suspension and adjustment of disconnection and reconnection activity is inconsistent with any requirement or expectation to enforce credit requirements or other tariff provisions, VEDO seeks a waiver or suspension of such requirement for the duration of the emergency and for any associated impacts thereafter.

C. Impact on customer communications

Finally, VEDO would note that it is in the process of suspending or modifying customer communications to correspond with the modifications and limitations discussed above. Subject to technological feasibility, VEDO intends to modify communications with its customers by suspending, at a minimum, automated calls associated with disconnects for non-payment and the 10-day letters for disconnection.

III. CONCLUSION

For the reasons set forth above, VEDO respectfully requests an order authorizing VEDO to suspend or modify the policies and practices set forth below and granting any waiver of any applicable Commission rule, tariff requirement, or policy or requirement that may be applicable to such policies or practices, including but not limited to the rules set forth in the Appendix A to this Motion.

Dated: March 24, 2020

Respectfully submitted,

/s/ Christopher T. Kennedy

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APPENDIX A

Enumerated Rules for Suspension

Rule	Rule Name
4901:1-13-04(D)	Meter Test at Customer's Request
4901:1-13-04(G)	Meter Reading
4901:1-13-05(A)	New Service Requests
4901:1-13-05(B)	Telephone Response
4901:1-13-05(C)	Scheduled Appointments with Customers
4901:1-13-05(D)	Repairs of Service Line Leaks
4901:1-13-08(E)	Reconnection of Small Commercial Customers
4901:1-13-10(B)-(E)	Complaint-handling
4901:1-18-07(A)	Reconnection of Service
4901:1-18-07(B)	Reconnection of Service
4901:1-18-07(C)	Reconnection of Service
4901:1-18-12(C)	PIPP Eligibility
4901:1-18-12(D)	PIPP Reverification of Eligibility
4901:1-18-16(D)	Graduate PIPP Plus Enrollment
4901:1-18-17(A)	PIPP and Graduate PIPP Termination
4901:1-18-17(B)	PIPP and Graduate PIPP Termination

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Summary: Application In the Matter of the Operations of Vectren Energy Delivery of Ohio, Inc. During the Declared State of Emergency and Related Matters: Motion for Suspension electronically filed by Mr. Christopher T Kennedy on behalf of Vectren Energy Delivery of Ohio, Inc.