

FILE

**LAW OFFICES
OF
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Public Utilities Commission of Ohio
Docketing Division
180 East Broad Street
Columbus, Ohio 43215-3793

May 1, 2020

SUBJECT: Filing Requests and Comments in Case titled:
In the Matter of the Proper Procedures and Process for the Commission's
Operations and Proceedings During the Declared State of Emergency and Related
Matters (PUCO 20-591 AU-UNC)

To the PUCO

1. Background: The Following Comments and Recommendations are being filed on behalf of myself Attorney Joseph Meissner, Utility Customer and Legal representative of various community groups, and on behalf of various neighborhood and community groups, and low-income families and customers.

2. Intention: It had been our intention to file this electronically. Somehow our office could not accomplish this because of a problem with the password. We called the PUCO docketing and were assisted by a very able PUCO representative, but somehow the old password was not available to us and when we filed for a new one, the process could not be timely completed.

3. Filing by FAX: So, we are filing this by FAX.

4. Our Recommendations and Requests: Here are our Recommendations and Requests.

(1) We request a reasonable extension of the Winter Reconnection period. We should probably rename it. This could be the Annual Turn-on Order. This present order should be amended to extend the period from ending on May 1, 2020, to 180 days after the stay-home orders are lifted, Ohio's State of Emergency is over, and the virus orders are lifted. This 180- day period and time should help families plan and readjust their utility situation in a reasonable manner.

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(2) This 180-day period should be extended to 360 days for any given customer if there is a proper repayment plan agreed to by all involved in the particular case. This would call for Current monthly balance to be paid timely plus a percentage of the past due. The past due amount would be paid by the customer at an amount of ten percent of the past due with a maximum of \$25.00 a month until the arrearage is paid off. (This plan would be in addition to the normal PIPP rules for eligible customers on PIPP.)

(3) First Energy and DEO and other companies should be ordered to come up with their plans to contact and reconnect all who were disconnected in the 360 period before the current crisis was declared in March 2020. These are customers whom we must be concerned about and who may be still disconnected. These customers could number in the thousands.

(4) PIPP should be extended to all at 250% of poverty level. If this requires legislative changes, then PUCO should request these.

(5) Utility companies should not be allowed to disconnect any customers until 180 days after Ohio's State of Emergency is over. Moreover, there should be a home visit by the Utility Company representative before any family is disconnected. Companies could make contracts with community neighborhood groups to help with such home visits.

(6) The Utility Companies should be ordered to research, or at least investigate, whether UV light could help fight the corona virus. (There have been reports that UV light could be a useful tool in fighting the corona virus.) If it is possible that UV light could be helpful to human beings either in killing off the virus or protecting human beings in fighting this virus, then such UV bulbs should be made available by the companies as part of their various energy and conservation programs. These bulbs should be available at either no cost or low cost to all customers requesting them. This program should be started and implemented within thirty days of May 1, 2020, and the program should be made available at least until May 1, 2021. Companies should also examine what else they can do to help customers fight this virus through proper use of electricity and heating.

(7) The PUCO should urge all municipal utilities and utilities not directly governed by the PUCO to adopt all of these policies contained in this document. The PUCO should also research how they could enforce these provisions against municipal utilities that fail or refuse to adopt these policies. (Do these municipal utilities register anything with the PUCO such as their vehicles?)

(8) The PUCO should be doing public service announcements letting people know where to get financial and other help to deal with their utility bill balances.

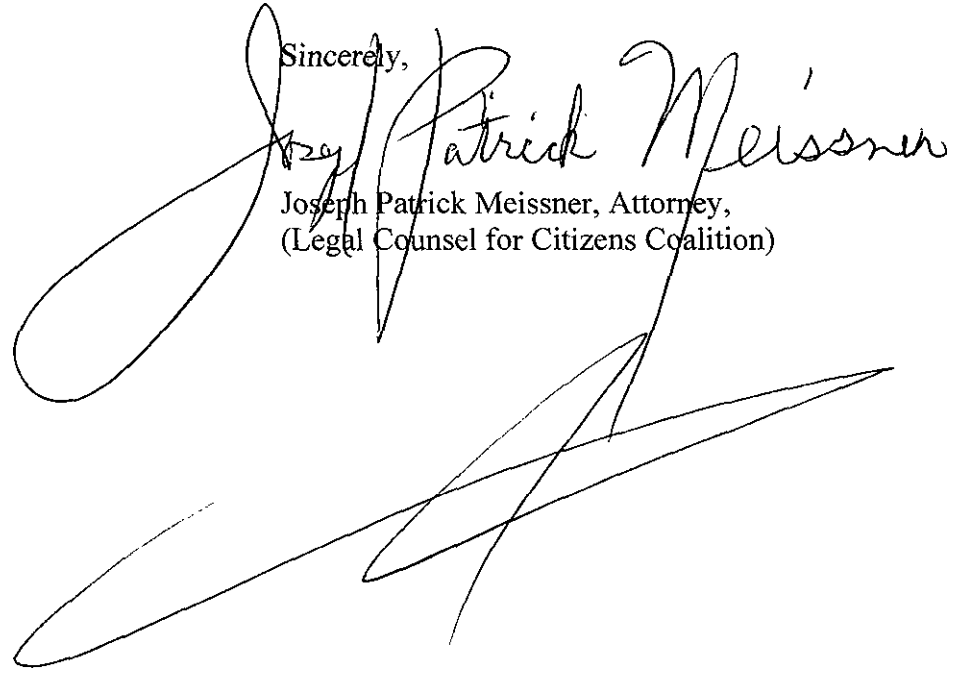
(9) The PUCO should extend or tie the HEAP Winter Crisis Program to the Winter Reconnect Order. The PUCO should consider carrying the Winter Reconnect Order through to the HEAP Summer Crisis Program. This could be called simply the HEAP Crisis Program.

(10) Our clients and the newly poor who qualify are not now contacting various helping agencies and these agencies and their programs are not getting the media coverage that would get the word out to everyone. ODSA/OCA should assume responsibility for sending out periodic blanket press releases and PSA's to all publications and radio and television stations. During "normal" times, it was fine for the Local Delegate Agencies to take responsibility for contacting the media, but this is now too big and burdensome for them alone and this effort must be made more comprehensive with support from the PUCO and other governmental agencies.

5. Conclusion: We urge the PUCO to adopt these Requests and Recommendations expeditiously. Thank you.

6. Service: We are filing these by FAX with PUCO docketing. We understand these will be available to all parties. We will be communicating with all involved in this case by email and will send them a copy of his. We are also transmitting this to all parties in this proceeding.

Sincerely,


Joseph Patrick Meissner, Attorney,
(Legal Counsel for Citizens Coalition)