



**Public Utilities
Commission**

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May 8, 2020

Docketing Division
Public Utilities Commission of Ohio
180 East Broad Street
Columbus OH 43215

RE: *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. During the Declared State of Emergency and Related Matters: Motion for Suspension, Case No. 20-0649-GA-UNC,*

Dear Docketing Division:

Enclosed please find the Staff Recommendation in the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of their Motion for Suspension or Modification in Case No. 20-0649-GA-UNC

Barbara Bossart
Chief, Reliability and Service Analysis Division
Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio

Enclosure
Cc: Parties of Record

Vectren Energy Delivery of Ohio, Inc.
Case No. 20-0649-GA-UNC

SUMMARY

On March 12, 2020, the Public Utilities Commission of Ohio (Commission) issued an order, in accordance with the Executive Order 2020-01D¹ (Executive Order) directing “all public utilities under its jurisdiction to review their service disconnection policies, practices, and tariff provisions and to promptly seek any necessary approval 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.”²

On March 24, 2020, Vectren Energy Delivery of Ohio, Inc. (VEDO or Company) filed an application proposing to suspend or modify certain policies and practices that may impose a service continuity hardship on residential and nonresidential customers or create unnecessary COVID-19 risks associated with social contact in three ways: 1) limitations on field activities; 2) suspension and adjustment of disconnection and reconnection activities; and 3) impact on customer communications.

STAFF REVIEW OF LIMITATIONS ON FIELD ACTIVITIES

The Company is requesting to minimize social contacts to the following activities:

- Emergency response
- New service requests and reconnections
- Service disconnections requested by the customer or when necessary for safety reasons
- Bare steel and cast iron 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
- Additional work performed by contractors to alleviate an emergency and/or reduce public safety risks

The Company states that these limitations may require it to deviate or forgo some actions required by the Ohio Administrative Code, company tariff provisions, or other policies and practices. This includes meter testing, actual meter readings, meter relocations, service upgrades, customer meetings, etc. Certain performance requirements such as average speed of answer, timing of reconnections and new-service installations may also be negatively impacted. VEDO is also limiting some activities under its demand-side-management programs, such as home energy efficiency programs. The Company is requesting waivers of several administrative rules as set forth in the table below.

¹ On March 9, 2020 the governor of Ohio signed Executive Order 2020-01D declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19.

² See *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*, Case No. 20-591-AU-UNC, Entry and Order dated March 12, 2020 at 1.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>Action</u>
4901:1-13-04(D)	Meter Test	Social Contact	VEDO will not be performing meter tests at customer's request
4901:1-13-04(G)	Meter Reading	Social Contact	VEDO will not be required to attempt to get an actual read every other month or be required to obtain an actual read once a year
4901:1-13-05(A)	New Service Requests	Social Contact	VEDO will not be required to complete new service requests in 3 days for locations that do not require installation of service lines, or within 20 days for locations that require service lines
4901:1-13-05(B)	Telephone Response	Service Continuity And Social Contact	VEDO customer service line answer times may exceed an average of 90 seconds due to increased volume or decreased staffing levels
4901:1-13-05(C)	Scheduled Appointments with Customers	Social Contact	VEDO will not have to provide windows for appointments or reschedule for the next day if an appointment is missed
4901:1-13-10(B)-(E)	Complaints and Complaint-Handling Procedures	Social Contact	VEDO will not be conducting in-person meetings with customers at this time and complaint handling times may be longer due to staffing levels

STAFF RECOMMENDATION REGARDING LIMITATIONS ON FIELD ACTIVITIES

Staff has no objections to the Company's limitations on field activities. Staff does not oppose the temporary waiver of administrative rules referenced above or related tariff requirements regarding in person meter reading, meter testing, new service installations, appointments, complaint handling, or the suspension of the call center answer time requirement. For customers who request an initial or final meter reading, Staff recommends that VEDO request and instruct willing customers how to provide a meter reading during the COVID-19 pandemic. Staff recommends the company continue to track and report any missed guidelines under Ohio Admin.Code 4901:1-13-05.

STAFF REVIEW OF SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES

The Company is requesting to alter the Company's disconnection policies and practices to suspend disconnection during the COVID-19 emergency. In addition, the Company is deferring or eliminating some fees to encourage reconnection or continuity of service. And finally, the Company is requesting waivers of several administrative rules as set forth in the table below.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>Action</u>
4901:1-13-08(E)	Reconnection of Small Commercial Service	Service Continuity	VEDO may reconnect small commercial customers without receiving any past due amounts.
4901:1-18-07(A)	Reconnection of Service	Service Continuity	VEDO may reconnect customers without receiving the default amounts needed under normal circumstances
4901:1-18-07(B)	Reconnection of Service	Service Continuity	VEDO may waive proof of payment options to reconnect service
4901:1-18-07(C)	Reconnection of Service	Service Continuity	VEDO may waive the collection charge for reconnection of service
4901:1-18-12(C)	PIPP Eligibility	Service Continuity	VEDO may waive requirements for enrolling in PIPP
4901:1-18-12(D)	PIPP Reverification of Eligibility	Service Continuity	VEDO is postponing reverification requirements
4901:1-18-16(D)	Graduate PIPP Plus Enrollment	Service Continuity	VEDO will not remove customers from PIPP+ for missed payments during this time
4901:1-18-17(A)&(B)	PIPP and Graduate PIPP Termination	Service Continuity	VEDO will not remove customers from PIPP+ at this time

STAFF RECOMMENDATION REGARDING SUSPENSION AND ADJUSTMENT OF DISCONNECTION AND RECONNECTION ACTIVITIES

Staff has no objections with the Company's suspension and adjustment of disconnection and reconnection activities by removing financial barriers to reconnection or continuity of service such as deposits, late fees for commercial customers, and reconnection fees.

In addition, Staff is not opposed to the suspension of the removal of Percentage of Income Payment Plan (PIPP) and Graduate PIPP Plus customers at the anniversary date because some customers

may not be able to keep current on their PIPP Plus payments, or be able to provide reverification requirements in order to maintain eligibility.

STAFF REVIEW OF GAS PIPELINE SAFETY CODE

The Company is requesting to suspend or modify certain gas pipeline safety activities.

<u>Rule</u>	<u>Rule Description</u>	<u>Reason</u>	<u>Action</u>
4901:1-13-05(D)	Repairs of Service Line Leaks	Service Continuity	VEDO may not complete service line repairs to lines that have been shut off by the end of the next business day

STAFF RECOMMENDATION REGARDING GAS PIPELINE SAFETY

Staff has no objections to the extension of time to repair service line leaks. However, Staff recommends that VEDO reconnect service lines after repairs as soon as practical.

STAFF REVIEW OF IMPACT ON CUSTOMER COMMUNICATIONS

The Company is requesting to modify communications with its customer by suspending the following:

- Automated calls associated with disconnects for non-payment
- 10-day letter for disconnection.

STAFF RECOMMENDATION REGARDING IMPACT ON CUSTOMER COMMUNICATIONS

Staff has no objections to the Company's suspension of these customer communications.

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Case No(s). 20-0649-GA-UNC

Summary: Comments PUCO Staff comments electronically filed by Mr. Craig E Smith on behalf of Public Utilities Commission of Ohio