

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of :
Ohio Power Company for Approval : Case No. 19-2141-EL-EDI
of an Operational Plan for Seamless :
Move :

In the Matter of the Application of :
The Dayton Power and Light Company : Case No. 19-2144-EL-UNC
for Approval of a future Operational Plan :
for Seamless Move :

In the Matter of the Application of :
Ohio Edison Company, the Cleveland :
Electric Illuminating Company, and the : Case No. 19-2150-EL-UNC
Toledo Edison Company for Approval :
of an Operational Plan for Seamless Move :

In the Matter of the Application of :
Duke Energy Ohio, Inc. for Approval : Case No. 19-2151-EL-EDI
of an Operational Plan for Seamless Move :

**REPLY COMMENTS
OF THE STAFF OF THE PUBLIC UTILITIES
COMMISSION OF OHIO**

I. BACKGROUND

In Case No. 14-2074 -EL-EDI, et al., Market Development Working Group Case (MDWG) the Commission ordered that a seamless move mechanism be adopted as the statewide standard for supplier migration when a Certified Retail Electric Service (CRES) customer moves within a given Electric Distribution Utility (EDU) footprint and the customer wishes to continue their current contract and transfer it with them to their new location. The Commission ordered each EDU in the state to work with the Retail

Energy Supply Association (RESA) to develop an operational plan for the implementation of a seamless move mechanism and to file this operational plan with the Commission for Commission Staff review and approval. On March 13, 2019, in the Second Entry on Rehearing in Case No. 14-2074-EL-EDI, et al., the Commission granted an extension of the operational plan filing deadline to December 13, 2019, and advised that an operational plan should be filed in a proceeding separate from the MDWG Case docket. First Energy, AEP Ohio, Dayton Power and Light, and Duke Ohio filed their applications for approval of an operational plan for implementing a seamless move mechanism on December 13, 2019, in the instant cases. The Staff of the Public Utilities Commission of Ohio (Staff) filed comments to each of the companies' operational plans on May 1, 2020.

II. REPLY COMMENTS

A. The Commission should reject the comments of RESA to include net metering customers.

Net metering customers are different from traditional customers. Net metering is a term used to describe a billing arrangement where customers who produce their own electricity can receive a credit on their electric utility bills for any extra electricity produced by the customer that flows back onto the electric utility's distribution system. Compared to a traditional customer, a net metering customer has two additional agreements: an interconnection agreement with the EDU and a net metering agreement with the EDU or a CRES provider. The net metering agreement is based on the customer's usage at their current premise and the equipment that has been installed at the

premise cannot produce more than 120% of the customer's usage. Net metering agreements cannot be transferred to another premise because the agreement itself is based upon the customer's usage at their current premise and generation equipment installed thereon. The EDUs in Ohio all currently manually bill net metering customers. Staff believes the functionality of a seamless move for net metering customers, which number less than 8,000, will delay implementation and increase costs.

B. The Commission should reject the comments of RESA to eliminate the re-enrollment process performed by the Electric Distribution Utilities (EDU).

Staff believes that the EDUs' call centers play an important role in consumer protection and are a source for customer education regarding energy choice in Ohio. The EDUs switch a customer's CRES provider based on an enrollment request from another supplier without regards to the customer's current contract. Although a rescission notice is sent to a customer, the Commission's call center receives complaints about early termination fees all the time because the customer is not aware of the provisions of his or her contract. Staff's experience with customer knowledge of Ohio's energy choice program indicates that most customers do not fully understand that they have options for their generation supply even if the customer is in a contract. Staff believes that one benefit of this program is a chance to educate customers of their choices, which is a benefit to the energy choice program.

C. The Commission should reject the comments of RESA to not pay for the functionality of seamless moves.

Staff believes that the CRES providers should pay for the functionality of seamless moves. Staff is not aware of rate payers requesting this service. Staff routinely reviews

contacts to the Commission's call center to determine what issues/concerns customers have regarding energy choice. Staff has not identified a concern from customers that they were unable to keep their contracts when moving. As Staff previously noted in its Staff Report filed in Case No. 14-2074-EL-EDI, the potential annual number of residential Ohio shopping customers eligible for a seamless move is 2.2% of all customers. Staff supports the energy choice program, but Staff does not have any data that seamless move is a service that rate payers are requesting as a needed upgrade to their service.

Respectfully submitted,

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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Reply 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 20th day of May, 2020.

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*On behalf of Direct Energy Business,
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Summary: Reply Comments of The Staff Of The Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO