

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of )  
Vectren Energy Delivery of Ohio, Inc. for )  
Approval to Continue Demand Side ) Case No. 19-2084-GA-UNC  
Management Program for its Residential, )  
Commercial, and Industrial Customers. )

**DIRECT TESTIMONY  
OF  
JAMES D. WILLIAMS**

**On Behalf of**  
**The Office of the Ohio Consumers' Counsel**  
*65 East State Street, 7th Floor*  
*Columbus, Ohio 43215*

**August 11, 2020**

## **TABLE OF CONTENTS**

|                             | <b>PAGE</b> |
|-----------------------------|-------------|
| I. INTRODUCTION .....       | 1           |
| II. PURPOSE/BACKGROUND..... | 3           |
| III. CONCLUSION.....        | 27          |

## **ATTACHMENT**

Attachment JDW-01 List of Previous Testimony Filed at the PUCO by James Williams

Attachment JDW-02 Vectren Response to OCC INT-02-004.

Attachment JDW-03 Vectren Response to OCC INT-02-005.

Attachment JDW-04 Vectren Response to OCC INT-02-001.

Attachment JDW-05 Vectren Response to OCC INT-02-002.

Attachment JDW-06 Vectren Response to OCC RPD-2-001 Gas PIPP Report.

Attachment JDW-07 Vectren Response to OCC INT-02-003.

Attachment JDW-08 Vectren Response to OCC INT-02-010.

Attachment JDW-09 Vectren Response to OCC INT-02-011.

Attachment JDW-10 Vectren Response to OCC INT-02-015.

1    **I.       INTRODUCTION**

2

3    ***Q1.    PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND POSITION.***

4    ***A1.***    My name is James D. Williams. My business address is 65 East State Street, 7th  
5           Floor, Columbus, Ohio 43215. I am employed by the Office of the Ohio  
6           Consumers' Counsel ("OCC") as a Utility Consumer Policy Expert.

7

8    ***Q2.    PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***  
9           ***PROFESSIONAL EXPERIENCE.***

10   ***A2.***    I am a 1994 graduate of Webster University, in St. Louis, Missouri, with a Master  
11           of Business Administration, and a 1978 graduate of Franklin University, in  
12           Columbus, Ohio, with a Bachelor of Science, Engineering Technology. My  
13           professional experience includes a career in the United States Air Force and over  
14           24 years of utility regulatory experience with the OCC.

15

16           Initially, I served as a compliance specialist with the OCC. My duties included the  
17           development of programs for agency review of the extent to which electric,  
18           natural gas, and water industries (including competitive suppliers of natural gas  
19           and electric service) were complying with laws and rules for consumer protection.

20           Later, I was designated to manage all of the agency's specialists who were  
21           developing compliance programs in each of the utility industries. My role evolved  
22           into the management of OCC's consumer hotline, which was the direct service  
23           provided to consumers to resolve complaints and inquiries that involved Ohio

*Direct Testimony of James D. Williams*  
*On Behalf of the Office of the Ohio Consumers' Counsel*  
*PUCO Case No. 19-2084-GA-UNC*

1 utilities and competitive suppliers of retail natural gas and electric services. More  
2 recently, following time as a Consumer Protection Research Analyst, I was  
3 promoted to an Expert Utility Consumer Policy Analyst. In this role, I am  
4 responsible for developing and recommending policy positions on a host of utility  
5 issues. Those issues include protections for low-income and non-low-income  
6 consumers, bill affordability and utility bill payment assistance programs that are  
7 all intended to help residential consumers including at-risk Ohioans that OCC is  
8 seeking to help in this case. I represent the OCC on the Public Benefit Advisory  
9 Board (“PBAB”), a statutory advisory body on low-income assistance programs  
10 to the Director, Ohio Development Services Agency.<sup>1</sup>

11  
12 In this proceeding, I reviewed the Application and supporting testimony filed by  
13 Vectren Energy Delivery Ohio (“Vectren”) on November 22, 2019. I also assisted  
14 in developing OCC comments and reply comments filed in this proceeding on  
15 March 6, 2020 and April 3, 2020, respectively. I reviewed the Stipulation and  
16 Recommendation (“Settlement”) filed in this proceeding on June 26, 2020. I have  
17 reviewed the testimony of the witnesses supporting the Settlement. Finally, I have  
18 reviewed the testimony of OCC witness Shutrump and the recommendations  
19 made in her testimony.

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<sup>1</sup> Ohio Revised Code 4928.58.

1   ***Q3. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY OR TESTIFIED***  
2   ***BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO?***

3   ***A3.*** Yes. The cases in which I have submitted testimony and/or have testified before  
4   the PUCO can be found in Attachment JDW-1.

5  
6   **II. PURPOSE/BACKGROUND**

7  
8   ***Q4. WHAT IS THE PURPOSE OF YOUR TESTIMONY?***

9   ***A4.*** The purpose of my testimony is to recommend that the PUCO reject the (the  
10   Settlement that was filed by the PUCO Staff, Vectren, the Environmental Law  
11   and Policy Center (“ELPC”), and the Ohio Partner for Affordable Energy  
12   (“OPAE”) in this proceeding on June 26, 2020. Vectren consumers have an  
13   immediate need for direct bill payment assistance during the current global  
14   pandemic that far outweighs any benefits that might result from the Settlement.  
15  
16   My testimony provides further background and support for the recommendations  
17   that were made in the OCC reply comments filed in the proceeding on April 3,  
18   2020. Specifically, OCC recommends that the remaining unspent 2020 low-  
19   income weatherization and home audit program funds be repurposed for the  
20   greater public benefit of providing immediate bill payment assistance to help  
21   consumers maintain their natural gas service. I further explain the repurposing  
22   proposal for 2021 low-income weatherization and home audit costs. I explain the

*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1 eligibility criteria and benefits that should be made available to consumers  
2 through a network of easy to access social service providers.

3

4 ***Q5. WHAT CRITERIA DOES THE COMMISSION USUALLY RELY UPON FOR***  
5 ***CONSIDERING WHETHER TO ADOPT A STIPULATION?***

6 ***A5.*** The PUCO will adopt a stipulation only if it meets all three criteria delineated  
7 below. The PUCO must analyze the Settlement and decide the following:

- 8 1. Is the Settlement a product of serious bargaining among capable  
9 knowledgeable parties?<sup>2</sup>
- 10 2. Does the Settlement, as a package, benefit customers and the public  
11 interest?
- 12 3. Does the Settlement package violate any important regulatory principle or  
13 practice?<sup>3</sup>

14

15 ***Q6. DOES THE SETTLEMENT, AS A PACKAGE, BENEFIT CUSTOMERS AND***  
16 ***THE PUBLIC INTEREST?***

17 ***A6.*** No. I view the Settlement as merely continuing the status quo of Vectren's  
18 customer-funded energy efficiency programs despite the fact that the funding is  
19 needed for a far greater purpose in helping at-risk Vectren customers pay their

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<sup>2</sup> See *In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company, Individually and, if Their Proposed Merger Is Approved, as a Merged Company (collectively, AEP Ohio) for an Increase in Electric Distribution Rates*, Case No. 11-351-EL-AIR, et al., Opinion and Order (December 14, 2011) at 9.

<sup>3</sup> *Consumers' Counsel v. Pub. Util. Comm'n.*, 64 Ohio St.3d 123, 126 (1992).

*Direct Testimony of James D. Williams*  
*On Behalf of the Office of the Ohio Consumers' Counsel*  
*PUCO Case No. 19-2084-GA-UNC*

1 natural gas bills. When I reference continuing the status quo, this means to me  
2 that the signatory parties to this Settlement are supporting their special interests as  
3 opposed to the interest of Vectren customers.<sup>4</sup> OCC, as the designated statutory  
4 representative of Ohio residential utility consumers,<sup>5</sup> cannot support a settlement  
5 that continues the status quo, benefiting a few special interests at the expense of  
6 the health and safety of all Vectren customers.

7  
8 Many Ohioans in Vectren's service territory are suffering the health and financial  
9 pain of the coronavirus emergency—and the consumer suffering is not ending  
10 anytime soon. The Ohio Department of Health recently issued an order requiring  
11 facial coverings for residents in counties served by Vectren and encouraging  
12 people with high risks and the elderly to stay in their residences.<sup>6</sup>

13  
14 Yet the Settlement provides funding that puts weatherization providers back into  
15 customer homes.<sup>7</sup> And the Settlement would result in higher customer bills in the  
16 form of \$18 million in charges to consumers between 2021 and 2023 for  
17 unnecessary energy efficiency programs.<sup>8</sup> The opportunity to reduce customer

---

<sup>4</sup> As an advocate for weatherization, Ohio Partners for Affordable Energy (“OPAE”) and its member organizations are the beneficiaries of the energy efficiency subsidy. The ELPC is an environmental advocate—not a consumer advocate.

<sup>5</sup> R.C. 4911.

<sup>6</sup> <https://coronavirus.ohio.gov/static/publicorders/Directors-Order-Facial-Coverings.pdf>.

<sup>7</sup> *In The Matter of The Proper Procedures and Process For the Commissions Operations and Proceedings During the Declared State of Emergency and Related Matters*, Case No. 20-591-AU-UNC.

<sup>8</sup> Application, Attachment A, (Nov. 22, 2019) at 8.

*Direct Testimony of James D. Williams*  
*On Behalf of the Office of the Ohio Consumers' Counsel*  
*PUCO Case No. 19-2084-GA-UNC*

1 bills by eliminating unnecessary energy efficiency expense comes at the very time  
2 when customers can benefit the most.

3 In response to OCC INT-2-04 (attached herein as JDW-2), Vectren disclosed that  
4 it had issued disconnection notices to over 94,000 residential customers between  
5 March and June 2020. And according to the Vectren response to OCC INT-2-005  
6 (attached herein as JDW-3), the collective amount that customers owed related to  
7 those notices was approximately \$54 million. But of more immediate concern,  
8 25,775 unique residential customers (approximately eight percent of Vectren  
9 customers) could be disconnected for non-payment on June 30, 2020.<sup>9</sup> Vectren  
10 customers must pay an average \$451 to avoid being disconnected.<sup>10</sup>

11  
12 It is for this reason that I support an immediate repurposing of the remainder of  
13 the 2020 low-income weatherization and home audits program funding towards  
14 customer bill payment assistance. Given that non-essential in-home  
15 weatherization services were suspended for several months beginning in March  
16 2020,<sup>11</sup> an expeditious order by the PUCO repurposing 2020 funding could make  
17 upwards of \$1 million immediately available for customer bill payment  
18 assistance. Repurposing the 2020 funds could help over 5,000 Vectren customers  
19 avoid disconnections right now.<sup>12</sup> By contrast, continuing the low-income

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<sup>9</sup> Vectren Response to OCC INT-2-001, (Attached herein as JDW-4).

<sup>10</sup> Vectren Response to OCC INT-2-002 (Attached herein as JDW-5).

<sup>11</sup> Case 20-591-AU-UNC, Entry, (Mar. 20, 2020).

<sup>12</sup> Assumed an average benefit amount of \$200.00.



*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1 weatherization program for 2020 provides funding for weatherizing perhaps 140  
2 homes.<sup>13</sup>

3 Repurposing the low-income weatherization funding and home audit program  
4 costs for 2021 will result in an additional \$2.2 million being available for  
5 customer bill payment assistance<sup>14</sup> and could potentially help at least another  
6 10,200 Vectren customers avoid loss of service. This is a far better use of the  
7 2021 funding than continuing low-income weatherization where perhaps 300  
8 homes might be weatherized.

9  
10 Further, Vectren's consumers would be best served if the PUCO were to postpone  
11 deciding what to do beyond 2021. It is difficult to predict what consumers' health  
12 and financial situation will be two years from now. Based on what I've seen so  
13 far, it is likely that the fallout from the coronavirus and ensuing financial  
14 emergency will extend to 2022 or even later. Indeed, it was written in the Wall  
15 Street Journal story that it will take at least a couple of years to dig ourselves out  
16 of hole the virus created.<sup>15</sup> Decisions for continuing the low-income  
17 weatherization program post 2021 should be delayed until an assessment is  
18 completed on the state of the coronavirus emergency in mid-2021 and the

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<sup>13</sup> Assuming \$1 million in remaining 2020 low-income weatherization funds and approximately \$7,000 expense for each weatherized home.

<sup>14</sup> The Vectren Application proposed spending \$2,104,894 in low-income weatherization in 2021 and \$104,556 in Home Energy Reports.

<sup>15</sup> See <https://www.wsj.com/articles/july-jobs-report-unemployment-claims-2020-11596771828>.

*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1       availability and level of federal funding for the Home Weatherization Assistance  
2       Program (“HWAP”) are known.

3       My further recommendations concerning the repurposed funding include the  
4       following:

- 5               •       Expand the number of customers who can be provided bill  
6                       payment assistance. Make the money for the expanded bill  
7                       payment assistance available to any Vectren customer with an  
8                       income at or below 300% of the federal poverty guidelines.  
9                       Currently, customers are only eligible for bill payment assistance  
10                      under the Low-Income Home Energy Assistance Program  
11                      (“HEAP”) if their income is below 175% of the federal poverty  
12                      guidelines.
- 13              •       Allow customers to be eligible for bill payment assistance under  
14                       OCC’s proposal once per year. Customers eligible for the  
15                       Percentage of Income Payment Plan (“PIPP”)<sup>16</sup> could receive up to  
16                       \$100<sup>17</sup> and non-PIPP customers up to \$300. Under this proposal,  
17                       assuming an average benefit of \$200 per customer (including  
18                       administrative charges), approximately 16,000 Vectren customers  
19                       could benefit during 2020 and 2021 from OCC’s consumer  
20                       protection proposal.

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<sup>16</sup> Customers can qualify for PIPP if their household income is at or below 150% of the federal poverty guidelines.

<sup>17</sup> According to the Gas PIPP Report for January – June 2020 (attached as JDW-6), an average PIPP installment payments are approximately \$48/month.

- Enable customers receiving these payments to be eligible for participation in other payment plans and assistance programs, like PIPP, HEAP, the Ohio HWAP, and generous deferred payment plans.
- Any repurposed funds that are not ultimately used for bill payment assistance should be used to offset Vectren's uncollectible expense rider that is charged to all customers. This approach will ultimately reduce what all customers pay for VEDO uncollectible expense (when customers do not pay their utility bills).

***Q7. CAN YOU EXPLAIN WHY IT IS IN THE PUBLIC INTEREST TO REPURPOSE THE VECTREN LOW-INCOME WEATHERIZATION DOLLARS FOR BILL PAYMENT ASSISTANCE TO CONSUMERS?***

***A7.*** Yes. Watching or reading the news on any given day in Ohio for a few minutes demonstrates the serious and significant impacts that the coronavirus pandemic has brought upon Ohioans. Customers in the Vectren service territory are not exempt. Even before the coronavirus, over 42,000 of the approximate 129,600 persons living in Dayton (or 32.7%) had reported incomes below the poverty line.<sup>18</sup> And approximately 17.5% of the population living in Montgomery County are living in a food insecure environment.<sup>19</sup> Food insecurity rates are a measure of

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<sup>18</sup> <https://www.welfareinfo.org/poverty-rate/ohio/dayton>.

<sup>19</sup> <https://www.feedingamerica.org/research/map-the-meal-gap/by-county>.

1 the total number of persons who do not have sufficient financial resources to  
2 maintain a healthy supply of food at their household.

3  
4 These numbers predate the pandemic, but during this emergency there is  
5 legitimate concern that these problems are rapidly increasing. In fact, food  
6 insecurity rates have nearly doubled in many areas across the state due to the  
7 pandemic.<sup>20</sup> In the coming months and potentially years, many Ohioans will  
8 struggle to pay their utility bills. Those Ohioans with financial challenges will  
9 include customers who have historically paid their bills in full and on time but  
10 who may be unable to continue doing so following the economic fallout of the  
11 coronavirus pandemic. Ohio businesses and families will face financial burdens  
12 that were unforeseeable just a few months ago.

13

14 ***Q8. ARE THERE SIGNIFICANT DIFFERENCES IN THE NATURAL GAS***  
15 ***USAGE PATTERNS OF LOW-INCOME PIPP CUSTOMERS COMPARED***  
16 ***TO ALL OTHER RESIDENTIAL CUSTOMERS THAT WARRANT***  
17 ***SPENDING FOR THE LOW-INCOME WEATHERIZATION PROGRAM?***

18 ***A8.*** Not at all. According to the Gas PIPP Report that was provided by Vectren in  
19 response to RPD-2-001 (attached herein as JDW-06), there is not a significant  
20 difference in the usage patterns of average PIPP customers compared to the  
21 average residential customer. For example, the average usage of Non-PIPP

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<sup>20</sup> <https://www.newsbreak.com/ohio/dayton/news/1591183911936/coronavirus-food-insecurity-has-doubled-locally-across-ohio>.

*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1 residential customers was 50.35 MCF between January and June 2020.<sup>21</sup> The  
2 average usage of PIPP customers was 56.45 MCF during the same period of  
3 January through June 2020.<sup>22</sup> The average number of PIPP customers between  
4 January and June 2020 was 9,460.<sup>23</sup> Therefore, PIPP customers in aggregate used  
5 approximately 57,706 MCF more than non-PIPP residential customers.<sup>24</sup> Using an  
6 average Standard Choice Offer (SCO) gas rate for the period January through  
7 June 2020 of \$2.94 per MCF,<sup>25</sup> the additional natural gas usage for PIPP  
8 customers came at a cost of approximately \$169,655. The minor difference in  
9 usage between average PIPP customers and all other residential customers  
10 demonstrates that the annual \$1.1 million that the signatory parties would support  
11 spending on low-income weatherization is ineffective and not necessary. And this  
12 further demonstrates that low-income weatherization funds would serve a far

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<sup>21</sup> JDW-06.

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup>  $(56.45 - 50.35) \times 9,460 = 57,706$  MCF.

<sup>25</sup>

[https://puco.ohio.gov/static/empliibrary/files/smed/Historical+LDC+Rates/Historical+Pricing\\_Vectren.pdf](https://puco.ohio.gov/static/empliibrary/files/smed/Historical+LDC+Rates/Historical+Pricing_Vectren.pdf).

1 greater purpose in helping Vectren customers with bill payment assistance they  
2 need right now.

3

4 ***Q9. WHEN WILL VECTREN RESUME IN-HOME WEATHERIZATION***  
5 ***SERVICES AND ALSO THE DISCONNECTION OF RESIDENTIAL***  
6 ***CONSUMERS FOR NON-PAYMENT?***

7 ***A9.*** The PUCO recently approved a transition plan that allows VEDO to resume  
8 disconnections for non-payment that have been suspended since mid-March 2020  
9 beginning August 15, 2020.<sup>26</sup> In the same order, the PUCO approved resumption  
10 of in-home weatherization services under the VEDO energy efficiency program.<sup>27</sup>

11

12 ***Q10. DO YOU HAVE AN IDEA HOW MANY VECTREN RESIDENTIAL***  
13 ***CUSTOMERS COULD BE FACING DISCONNECTION AFTER AUGUST***  
14 ***15, 2020?***

15 ***A10.*** Yes. As I described earlier, as of June 30, 2020, there were 25,775 residential  
16 customers eligible for disconnection.<sup>28</sup> Given the average disconnection amount  
17 was \$451.00, customers owed over \$11.6 million in past due account balances.  
18 Yet according to the Vectren response to OCC INT-2-003 (attached herein as  
19 JDW-07), only 1,387 customers (or approximately 5.4 percent) of these customers  
20 were on an active payment plans in July 2020. And only 81 customers had been

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<sup>26</sup> Case 20-649-GA-UNC, Supplemental Finding & Order (July 29, 2020).

<sup>27</sup> *Id.*

<sup>28</sup> *See* JDW-04.

*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1       able to successfully complete an extended payment plan.<sup>29</sup> The relatively few  
2       customers that are currently on payment plans to avoid further delinquency tells  
3       me that mid-August can be a dismal time for many Vectren customers.

4  
5       The bill payment assistance I am proposing in this testimony will help those  
6       customers who are most in need of assistance because of the coronavirus  
7       emergency. My proposal will also help PIPP customers make any missed PIPP  
8       payments so that they are not at risk of being removed from PIPP and avoid  
9       building up future debt.

10

11    ***Q11. IS VECTREN OFFERING ANY SPECIAL PAYMENT PLANS TO HELP***  
12    ***CONSUMERS WHO ARE FACING DISCONNECTION?***

13    ***A11.*** Other than a 12-month extended payment plan approved in the transition plan,<sup>30</sup>  
14       Vectren is offering only the same status quo payment plans that are required  
15       under the PUCO rules. The 12-month payment plan allows customers to pay the  
16       past-due balance in equal installments over 12 months along with current charges.

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<sup>29</sup> See JDW-07.

<sup>30</sup> *Id.* at 14.

1 ***Q12. CAN YOU PROVIDE ADDITIONAL DETAILS ABOUT BILL PAYMENT***  
2 ***ASSISTANCE PROGRAMS THAT ARE REQUIRED FOR LOW-INCOME***  
3 ***VECTREN CUSTOMERS?***

4 ***A12.*** Yes. PIPP is the primary low-income bill payment assistance programs in the  
5 State of Ohio. The PUCO originally created it during the early 1980s as a  
6 response to an earlier state emergency with high energy costs, economic  
7 recession, and the crisis of many low-income customers who were facing  
8 disconnection for non-payment.

9  
10 PIPP enables low-income households to pay a percentage of their monthly income  
11 (six percent of household income or \$10.00, whichever is greater), as payment  
12 towards their gas bill.<sup>31</sup> A companion program was created by the PUCO for  
13 electric low-income customers and was later codified in Ohio law, where low-  
14 income Ohioans could pay a percentage of their monthly household income  
15 towards their electric utility bills. Administered by the Ohio Development  
16 Services Agency (“ODSA”),<sup>32</sup> low-income electric customers pay six percent of  
17 their monthly household income or \$10.00 (whichever is greater) towards their  
18 electric bill.

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<sup>31</sup> <http://codes.ohio.gov/oac/4901:1-18-13v1>.

<sup>32</sup> Ohio Adm. Code 122:5-3.



*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1 Customers are eligible for PIPP if their household income for the past three  
2 months is at or below 150% of the federal poverty guidelines.<sup>33</sup> For a family of  
3 four, the total annual household incomes of at or below \$38,625 can qualify for  
4 PIPP. However, the majority of PIPP customers have household incomes below  
5 75% of the federal poverty guidelines.

6

7 PIPP is not a social give-away. In fact, PIPP participants are ultimately  
8 responsible for paying the difference between the actual natural gas and/or  
9 electric bill and the PIPP payment amount. There are strict payment guidelines in  
10 the rules that require on-time and in-full payment of the PIPP amount that can  
11 help customers avoid building-up large natural gas arrearages. But if the payments  
12 are not made on-time and in-full, customers miss the opportunity to obtain  
13 immediate incentive credits towards their arrearages<sup>34</sup>. And for customers who  
14 have gone off the regular PIPP program and are now on Graduate-PIPP, all  
15 payments must be made in-full and on-time for the customers to fully discharge  
16 their PIPP debt. Bill payment assistance could be the only option that is available  
17 to help these recent PIPP customers who are just coming out of poverty avoid  
18 accruing additional personal debt.

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<sup>33</sup> <http://codes.ohio.gov/oac/4901:1-18-12v1>.

<sup>34</sup> <http://codes.ohio.gov/oac/4901:1-18-14v1>.

1    ***Q13.  HOW IS THE PIPP PROGRAM PAID FOR?***

2    ***A13.***   PIPP is paid for through a rider on all Vectren customer bills.<sup>35</sup> The rider itself  
3           collects the difference between customers' actual bills and the PIPP payment  
4           made by customers. In addition, the rider can collect the cost associated with  
5           arrearages that are owed by customers enrolling on PIPP and delinquent charges if  
6           customers do not make their PIPP payments.

7  
8    ***Q14.  HAS THERE BEEN A SUBSTANTIAL INCREASES IN THE NUMBER OF***  
9           ***VECTREN PIPP CUSTOMERS?***

10   ***A14.***   No. According to the Vectren response to INT-02-10 (attached herein as JDW-  
11           08), there are currently 9,612 customers on PIPP, which is 236 customers fewer  
12           than when the pandemic began. This indicates to me that many of the recently  
13           unemployed Ohioans in the Vectren service territory are still unable to qualify for  
14           PIPP because adjustments in the annualized income still exceeds 150% of the  
15           federal poverty guidelines. Also, many recently unemployed Ohioans have not  
16           participated in low-income assistance programs in the past and may not be aware  
17           of the existence of these programs. Finally, many of the Vectren customers may  
18           be income-ineligible for PIPP but will still be able to benefit from the bill  
19           payment assistance program I am proposing.

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<sup>35</sup> Vectren Tariff, P.U.C.O. No. 3, Sheet No. 40.

1   ***Q15. WILL REPURPOSING LOW-INCOME ENERGY EFFICIENCY FUNDING***  
2           ***HELP PIPP CUSTOMERS AND ALSO HELP REDUCE WHAT ALL OTHER***  
3           ***CUSTOMERS PAY TO FUND PIPP?***

4   ***A15.*** Yes. Repurposing low-income energy efficiency funds serves two purposes. First,  
5           the repurposed funds help PIPP customers pay their bill to take advantage of  
6           incentive credits tied to in-full and on-time payments and thus avoid building up  
7           large arrearages that can lead to their eventual removal from PIPP. For example,  
8           in June 2020, of the 9,612 PIPP customers who were billed for the month, only  
9           5,696 (approximately 68%) of the PIPP customer payments were made in-full and  
10          on-time.<sup>36</sup> It is extremely important for PIPP customers to be able to make all  
11          payments in-full and on-time to remain enrolled on PIPP and to take advantage of  
12          arrearage credits to avoid building future debt. PIPP customers must make up any  
13          missed PIPP payments by their annual anniversary date or they will be removed  
14          from the PIPP program.<sup>37</sup> Second, the repurposed funds will help to avoid  
15          increases in uncollected PIPP charges and pre-PIPP arrearages, thus reducing the  
16          potential impact of future increases in what all customers pay to fund the PIPP  
17          rider as additional customers enroll in PIPP.

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<sup>36</sup> Vectren Response to OCC INT-02-011 (Attached herein as JDW-9).

<sup>37</sup> Ohio Adm. Code 4901:1-18-01(Q).

1 ***Q16. CAN YOU PROVIDE DETAILS ON OTHER PUCO-REQUIRED PAYMENT***  
2 ***PLANS THAT VECTREN IS REQUIRED TO OFFER NON-LOW-INCOME***  
3 ***RESIDENTIAL CUSTOMERS?***

4 ***A16.*** Yes. The PUCO's Minimum Service Standards require utilities to offer payment  
5 plans including one-third, one-sixth, and one-ninth payment plans to customers  
6 who are delinquent in payments or who wish to avoid delinquency.<sup>38</sup>

7  
8 The one-third payment plan is required during the winter heating season between  
9 the months of November through April of each year. Under that plan customers  
10 can pay one-third of the actual bill (including both current and past due  
11 charges).<sup>39</sup>

12  
13 Under the one-sixth payment plan customers can pay one sixth of the past due  
14 amount over six equal installments along with the current monthly charges on the  
15 bill.<sup>40</sup>

16  
17 Under the one-ninth payment plan customers can pay equal installment of one  
18 ninth of the past due amount in addition to a uniform budget bill payment  
19 amount.<sup>41</sup>

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<sup>38</sup> Ohio Adm. Code 4901:1-18-05(B).

<sup>39</sup> <http://codes.ohio.gov/oac/4901:1-18-05v1>.

<sup>40</sup> *Id.*

<sup>41</sup> *Id.*

1 While these installment payment plans are helpful to some consumers, the  
2 additional burden of paying current charges along with a past delinquent amounts  
3 can be unmanageable for many consumers and especially for those who recently  
4 lost their jobs and income because of the coronavirus pandemic. Bill payment  
5 assistance helps PIPP and non-PIPP customers meet their payment plan  
6 obligations.

7

8 ***Q17. IS VECTREN REQUIRED TO OFFER CUSTOMERS PAYMENT PLANS***  
9 ***THAT ARE CUSTOMIZED TO MEET THE NEEDS OF RESIDENTIAL***  
10 ***CUSTOMERS?***

11 ***A17.*** Not really. Ohio Admin. Code 4901:1-18-05(A) requires Vectren to make  
12 reasonable payment extensions or other extended payment plans under terms that  
13 are appropriate for both the customer and Vectren. These are the types of payment  
14 plans that are negotiated between Vectren and the customer, which hopefully that  
15 customer will be able to fulfill. But unfortunately, Vectren has the final say in  
16 determining if it will accept these types of payment arrangements.

17

18 The bill payment assistance that I am proposing could be available for making a  
19 one-time payment that many customers may need until they are back to work or  
20 until they can qualify for other available assistance programs.

1    ***Q18. HOW IS VECTREN BAD DEBT COLLECTED FROM CUSTOMERS?***

2    ***A18.*** All customers pay for the bad debt expenses through an uncollectible expense  
3       rider on the Vectren gas bills.<sup>42</sup> This is why it is so important for customers to be  
4       able to pay their natural gas bills. And this is also why the payment plans that are  
5       described above and the bill payment assistance program that I am proposing  
6       serve an important role in helping customers avoid delinquency on the natural gas  
7       account.

8

9    ***Q19. WILL REPURPOSING LOW-INCOME ENERGY EFFICIENCY FUNDING***  
10    ***HELP MITIGATE THE COSTS THAT ALL CUSTOMERS PAY FOR THE***  
11    ***UNCOLLECTIBLE RIDER?***

12   ***A19.*** Yes. Repurposing low-income energy efficiency funds serves two purposes. First,  
13       the repurposed funds help customers pay their bills and thus avoid getting  
14       disconnected for non-payment. Second, the repurposed funds help to avoid  
15       increased charges to other customers that Vectren collects through the  
16       uncollectible rider. All Vectren customer debt is collected from customers  
17       through the PIPP Rider and the uncollectible rider.<sup>43</sup>

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<sup>42</sup> Vectren Tariff, P.U.C.O. 3, Sheet No. 39. Uncollectible Expense Rider.

<sup>43</sup> Vectren response to OCC INT-02-015 (Attached herein as JDW-10).

1   ***Q20. ARE THERE OTHER BILL PAYMENT/FINANCIAL ASSISTANCE***  
2       ***PROGRAMS AVAILABLE NOW TO HELP VEDO RESIDENTIAL***  
3       ***CUSTOMERS?***

4   ***A20.*** Yes. But many of these programs have restrictions on their use that may or may  
5       not be helpful for Vectren customers who are facing disconnection right now.

7   ***Q21. PLEASE EXPLAIN.***

8   ***A21.*** The primary financial assistance program is the federal Low-Income Home  
9       Energy Assistance Program (“HEAP”). HEAP is administered by the Ohio  
10      Development Services Agency (“ODSA”) and provides both regular HEAP  
11      benefits in the form of a credit towards winter heating costs and crisis assistance  
12      for eligible customers during the winter and summer months. But summer crisis  
13      assistance is currently only available for electric customers. Crisis assistance for  
14      natural gas customers will not be available until November. The only immediate  
15      help that is available for customers may be through the United Way of Greater  
16      Dayton Area referral resources.<sup>44</sup>  
17  
18      The PUCO typically issues a winter reconnection order with special disconnection  
19      and reconnection procedures prior to each winter heating season that includes a  
20      maximum \$175 payment amount to avoid shut-off or get reconnected. The bill  
21      payment assistance that I am proposing can help pay the upfront payment amount

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<sup>44</sup> <https://dayton-unitedway.org/get-help-now/>.

1 so that customers can maintain natural gas as we enter the next winter heating  
2 season.

3  
4 ***Q22. ARE THE CURRENT FINANCIAL ASSISTANCE/ BILL PAYMENT***  
5 ***ASSISTANCE PROGRAMS SUFFICIENT TO HELP ALL VECTREN***  
6 ***CUSTOMERS WHO ARE IN NEED?***

7 ***A22.*** No. Households with annual incomes that are above 175% of the federal poverty  
8 guidelines are ineligible for HEAP financial assistance. Households with incomes  
9 above 150% of the federal poverty guidelines are ineligible for PIPP. While  
10 combined, PIPP and HEAP assistance might be able to help some Vectren  
11 customer households, there are a substantial number of households with incomes  
12 above 175% of the federal poverty guidelines that have few (if any) available  
13 options for assistance in paying their gas bill.

14  
15 Specifically, approximately 8.9% of Ohio households have incomes between 150  
16 and 200% of the federal poverty guidelines. While the exact number of Vectren  
17 customers who have incomes in the range of 150% poverty to 200% poverty is  
18 unknown, this could be a sizeable number and growing because of the pandemic.  
19 Given the number of Vectren customers receiving disconnection notices and now  
20 facing disconnection, I project that thousands of Vectren customers could use bill  
21 payment assistance yet are ineligible for PIPP or other payment assistance  
22 programs. My proposal would extend the bill payment assistance to households



1 with incomes at or below 300% of the federal poverty guidelines on an annualized  
2 basis.

3  
4 ***Q23. ISN'T THERE ADDITIONAL FEDERAL HEAP FUNDING THAT IS***  
5 ***BEING MADE AVAILABLE TO HELP CONSUMERS?***

6 ***A23.*** Yes. In addition to the 2020 federal HEAP funds made available to Ohio, an  
7 additional HEAP dollars were made available in Ohio as part of a stimulus bill to  
8 respond to the coronavirus pandemic that was passed by Congress and signed by  
9 the President on March 27, 2020.<sup>45</sup> The Ohio allocation was approximately \$44  
10 million.<sup>46</sup>

11  
12 ***Q24. DOES THE ADDITIONAL FEDERAL FUNDING FOR HEAP NEGATE***  
13 ***THE NEED FOR ADDITIONAL BILL PAYMENT ASSISTANCE FUNDS***  
14 ***FOR CUSTOMERS?***

15 ***A24.*** Not at all. The additional HEAP funding will be made available throughout Ohio.  
16 HEAP is made available for financial assistance for customers using multiple fuel  
17 types and crossing many different industries in Ohio. To the extent that the  
18 repurposed low-income energy efficiency funds can be used to help Vectren  
19 customers now, this will help reduce the statewide demand that hundreds of  
20 thousands of Ohioans have for the additional HEAP funding as Ohio enters

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<sup>45</sup> <https://liheapch.acf.hhs.gov/>. This is commonly referred to as the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

<sup>46</sup> [https://www.acf.hhs.gov/sites/default/files/ocs/comm\\_liheap\\_secondreleasedclstatererrtable\\_fy2020.pdf](https://www.acf.hhs.gov/sites/default/files/ocs/comm_liheap_secondreleasedclstatererrtable_fy2020.pdf).

*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

1 another winter heating season. And of course, as I explained above, this HEAP  
2 funding is only available for customers up to 175% of the Federal Poverty  
3 Guidelines, so customers above that income-level will not benefit at all.  
4

5 ***Q25. DO CUSTOMERS HAVE TO HAVE A DISCONNECTION NOTICE TO***  
6 ***QUALIFY UNDER THE BILL PAYMENT ASSISTANCE THAT OCC IS***  
7 ***RECOMMENDING FOR VECTREN CUSTOMERS?***

8 ***A25.*** No. While this criterion must be met to obtain crisis assistance under the HEAP  
9 guidelines, I recommend that these additional funds be used to help customers  
10 avoid getting behind in their payments to begin with.  
11

12 ***Q26. IF CUSTOMERS RECEIVE REPURPOSED FUNDS UNDER OCC'S***  
13 ***PROPOSAL, SHOULD THEY BE PROHIBITED FROM RECEIVING***  
14 ***OTHER FORMS OF CONSUMER ASSISTANCE?***

15 ***A26.*** No. While I recommend that customers be eligible for using the repurposed funds  
16 once per calendar year, I do not recommend restricting customers from accessing  
17 any other financial assistance or bill payment programs for which they are  
18 eligible. The health emergency is also a financial emergency for many Ohioans,  
19 and the government should make help broadly available to Ohioans  
20 commensurate with this terrible circumstance.

1    ***Q27. DO YOU HAVE A PROPOSED CAP FOR THE AMOUNT OF BILL***  
2            ***PAYMENT ASSISTANCE THAT COULD BE PROVIDED TO INDIVIDUAL***  
3            ***ELIGIBLE CUSTOMERS?***

4    ***A27.*** Yes. My recommendation is that PIPP customers could be provided up to \$100 of  
5            one-time assistance towards their PIPP bill and non-PIPP customers could be  
6            provided up to \$300.

7

8    ***Q28. HOW WOULD THE BILL PAYMENT ASSISTANCE FUNDS BE***  
9            ***DISTRIBUTED TO CUSTOMERS?***

10   ***A28.*** Vectren already has an established relationship with United Way (and Dayton  
11            Foundation) for referring customers who have financial assistance needs. My  
12            proposal is to expand upon this relationship for distributing the repurposed funds  
13            in the communities they serve. Other agencies can be identified to distribute the  
14            funds through information and referral resources under coordination with United  
15            Way. This also includes potentially using organizations such as the Dollar Energy  
16            Fund that currently distributes bill payment assistance for AEP Ohio.

17

18   ***Q29. WHAT ARE THE NEXT STEPS IN ESTABLISHING A NETWORK TO***  
19            ***DISTRIBUTE THE BILL PAYMENT ASSISTANCE FUNDS TO VECTRENS***  
20            ***CUSTOMERS THAT OCC RECOMMENDS?***

21   ***A29.*** In rejecting the Settlement, I would ask the PUCO to require Vectren to provide a  
22            full accounting of the low-income weatherization dollars that are available for bill  
23            payment assistance for the remainder of 2020 and through 2021. In addition,

*Direct Testimony of James D. Williams  
On Behalf of the Office of the Ohio Consumers' Counsel  
PUCO Case No. 19-2084-GA-UNC*

Vectren should report on the number of Vectren residential customers in each county (and city) where it serves and the number of customers facing disconnection in each county. Vectren should work cooperatively with OCC, the PUCO Staff, and others in contacting the appropriate United Way offices to determine interest in distributing the repurposed funds. If the United Way offices are unable to distribute the funds, Dollar Energy will be contacted to arrange organizations to distribute the funds across the Vectren service territory.

A standard grant application form will be used for documenting eligibility as well as the customer specific requests for assistance with each of the agencies. Vectren should designate contacts for processing the grants from United Way and other organizations that are distributing the funds and posting the awarded amount on customer accounts.

***Q30. ARE THERE AMPLE FUNDING AVAILABLE IN THE STATE TO ADDRESS LOW-INCOME WEATHERIZATION NEEDS OF CUSTOMERS?***

***A30.*** Yes. Traditionally up to 15% of the Ohio HEAP block grant was transferred for the purpose of providing weatherization under the Home Weatherization Assistance Program (“HWAP”). I would note that in two recent laws (Ohio House Bill 166<sup>47</sup> of the 133rd General Assembly section 259.70 and Ohio House Bill 6 of the 133rd <sup>48</sup> General Assembly section 5), the 15% allocation was increased to 20% and then to 25% of HEAP funds being used for weatherization. ODSA has

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<sup>47</sup> [http://search-prod.lis.state.oh.us/solarapi/v1/general\\_assembly\\_133/bills/hb166/EN/09?format=pdf](http://search-prod.lis.state.oh.us/solarapi/v1/general_assembly_133/bills/hb166/EN/09?format=pdf).

<sup>48</sup> [http://search-prod.lis.state.oh.us/solarapi/v1/general\\_assembly\\_133/bills/hb6/EN/06?format=pdf](http://search-prod.lis.state.oh.us/solarapi/v1/general_assembly_133/bills/hb6/EN/06?format=pdf).

1 requested a waiver from the federal government to increase funding to 20% of the  
2 LIHEAP block grant. This means that approximately \$30 million is being made  
3 available in Ohio for low-income weatherization this year and quite possibly more  
4 next. This funding should be more than sufficient to weatherize low-income  
5 homes without the need for Vectren customers paying for additional low-income  
6 weatherization services.

7

8 ***Q31. IF ANY OF THE REPURPOSED ENERGY EFFICIENCY FUNDS ARE NOT***  
9 ***EXPENDED, DO YOU HAVE A RECOMMENDATION FOR HOW THE***  
10 ***FUNDS SHOULD BE USED TO BENEFIT VECTREN CUSTOMERS?***

11 ***A31.*** Yes. Any repurposed funds that are not ultimately used to pay for previous low-  
12 income weatherization expenses that have yet to be collected from customers or  
13 bill payment assistance should be used to offset the Vectren uncollectible rider.  
14 This provides the greatest benefit by reducing the burden on all customers who  
15 pay for amounts Vectren is unable to collect.

16

17 **III. CONCLUSION**

18

19 ***Q32. DOES THIS CONCLUDE YOUR TESTIMONY?***

20 ***A32.*** Yes. However, I reserve the right to incorporate new information that may  
21 subsequently become available.

### **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Direct Testimony of James D. Williams on Behalf of the Office of the Ohio Consumers' Counsel* was served via electronic transmission to the persons listed below on this 11<sup>th</sup> day of August 2020.

/s/ Christopher Healey  
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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|  | <a href="mailto:Joe.oliker@igs.com">Joe.oliker@igs.com</a>                     |
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**Testimony of James D. Williams**  
**Filed at the Public Utilities Commission of Ohio**

1. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 95-0656-GA-AIR (August 12, 1996).*
2. *In the Matter of the Application of the Cincinnati Gas and Electric Company for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 01-1228-GA-AIR (February 15, 2002).*
3. *In the Matter of the Commission's Investigation into the Policies and Procedures of Ohio Power Company, Columbus Southern Power Company, The Cleveland Electric Illuminating Company, Ohio Edison Company, The Toledo Edison Company and Monongahela Power Company regarding installation of new line extensions, Case No. 01-2708-EL-COI (May 30, 2002).*
4. *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for an Increase in Its Rates for Gas Service to All Jurisdictional Customers, Case No. 07-0829-GA-AIR (June 23, 2008).*
5. *In the Matter of the Application of the Columbia Gas of Ohio, Inc. for Authority to Amend Filed Tariffs to Increase the Rates and Charges for Gas Distribution, Case No. 08-072-GA-AIR (September 25, 2008).*
6. *In the Matter of a Settlement Agreement Between the Staff of the Public Utilities Commission of Ohio, The Office of the Consumers' Counsel and Aqua Ohio, Inc. Relating to Compliance with Customer Service Terms and Conditions Outlined in the Stipulation and Recommendation in Case No. 07-564-WW-AIR and the Standards for Waterworks Companies and Disposal System Companies, Case No. 08-1125-WW-UNC (February 17, 2009).*
7. *In the Matter of the Application of the Ohio American Water Company to Increase its Rates for water and Sewer Services Provided to its Entire Service Area, Case No. 09-391-WS-AIR (January 4, 2010).*
8. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in its Masury Division, Case No. 09-560-WW-AIR (February 22, 2010).*
9. *In the Matter of the Application of Aqua Ohio, Inc. for Authority to Increase its Rates and Charges in Its Lake Erie Division, Case No. 09-1044-WW-AIR (June 21, 2010).*

- IO. *In the Matter of the Application of The Ohio American Water Company to Increase its Rates/or Water Service and Sewer Service*, Case No. 11-4161-WS-AIR (March 1, 2012).
11. *In the Matter of/Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 11-346-EL-SSO, et al (May 4, 2012).
12. *In the Matter of the Application of/The Dayton Power and Light Company for Approval of its Market Rate Offer*, Case No. 12-426-EL-SSO (June 13, 2012).
13. *In the Matter of the Application of Ohio Power Company to Establish Initial Storm Damage Recovery Rider Rates*, Case No. 12-3255-EL-RDR (December 27, 2013).
14. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Ohio Rev. Code, in the Form of an Electric Security Plan*, Case No. 13-2385-EL-SSO (May 6, 2014).
15. *In the Matter of the Application of Duke Energy Ohio/or Authority to Establish a Standard Service Offer Pursuant to Section 4928.143, Revised Code, in the Form of an Electric Security Plan, Accounting Modifications and Tariffs for Generation Service*, Case 14-841-EL-SSO (May 29, 2014).
16. *In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company for Authority to Provide for a Standard Service Offer Pursuant to R.C. 4928.143 in the Form of an Electric Security Plan*, Case No. 14-1297-EL-SSO (December 22, 2014).
17. *In the Matter of the Application of Duke Energy Ohio, Inc., to Adjust Rider DR- IM and Rider AU for 2013 Grid Modernization Costs*, Case No. 14-1051-EL- RDR (December 31, 2014) and (February 6, 2015).
18. *In the Matter of the Application Not for an Increase in Rates Pursuant to Section 4901:18, Revised Code, of Ohio Power Company to Establish Meter Opt-Out Tariff*, Case No. 14-1158-EL-ATA (April 24, 2015).
19. *In the Matter of the Application of Duke Energy of Ohio, Inc., for Approval of a Grid Modernization Opt-out Tariff and for a Change in Accounting Procedures Including a Cost Recovery Mechanism.*, Case 14-1160-EL-UNC and 14-1161-EL- AAM (September 18, 2015).



20. *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of an Alternative Rate Plan Pursuant to Section 4929.05, Revised Code, for an Accelerated Service Line Replacement Programs*, Case No. 14-1622-GA-ALT (November 6, 2015).
21. *In the Matter of the Complaint of Jeffrey Pitzer, Complainant, v. Duke Energy Ohio, Inc. Respondent.*, Case No. 15-298-GE-CSS (December 30, 2015).
22. *In the Matter of the Application of Ohio Power Company to Initiate Phase 2 of Its gridSMART Project and to Establish the gridSMART Phase 2 Rider*, Case No. 13-1939-EL-RDR (July 22, 2016).
23. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand Side Management Program for its Residential and Commercial Customers*, Case No. 16-1309-GA-UNC (September 13, 2016).
24. *In the Matter of the Application of the Dayton Power and Light Company for Approval of Its Electric Security Plan*, Case No. 16-0395-EL-SSO (November 21, 2016). Supplemental Testimony, (March 29, 2017).
25. *In the Matter of the Application of Aqua Ohio, Inc. to Increase Its Rates and Charges for Its Waterworks Service.*, Case No. 16-0907-WW-AIR (December 19, 2016).
26. *In the Matter of the Application of Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant to R.C. 4928.143, in the Form of an Electric Security Plan*, Case No. 16-1852-EL-SSO, (May 2, 2017).
27. *In the Matter of the Application of the Ohio Development Services Agency for an Order Approving Adjustments to the Universal Service Fund Riders of Jurisdictional Ohio Electric Distribution Utilities*, Case No. 17-1377-EL-USF, (August 11, 2017).
28. *In the Matter of the Application of Duke Energy Ohio, Inc. to Adjust Rider AU for 2016 Grid Modernization Costs*, Case No. 17-690-GA-RDR, (August 18, 2017).
29. *In the Matter of the Application of Duke Energy Ohio, Inc., for an Adjustment to Rider AMRP Rates*, Case No. 17-2318-GA-RDR, (April 5, 2018).
30. *In the Matter of the Application of Dayton Power and Light Company for an Increase in Electric Distribution Rates*, Case No. 15-1830-EL-AIR, (April 11, 2018).
31. *In the Matter of the Application of Duke Energy Ohio, Inc. for an Increase in Electric Distribution Rates*, Case No. 17-032-EL-AIR, et al, (June 25, 2018).

32. *In the Matter of the Complaint of Citizens Against Clear Cutting, et al., Complainants, v. Duke Energy Ohio, Inc. Respondent*, Case No. 17-2344-EL-CSS (August 27, 2018). Supplemented Direct Testimony (November 9, 2018).
33. *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Increase in Gas Rates*, Case No. 18-0298-GA-AIR (November 7, 2018). Supplemental Testimony (January 22, 2019).
34. *In the Matter of the Application of Ohio Power Company to Update Its Enhanced Service Reliability Rider*, Case No. 17-1914-EL-RDR (May 3, 2019).
35. *In the Matter of the Application of the Review of Duke Energy Ohio, Inc.'s Distribution Capital Investment Rider*, Case No. 18-1036-EL-RDR, (July 8, 2019).
36. *In the Matter of the Review of the Distribution Investment Rider Contained in the Tariff of Ohio Power Company*, Case No. 17-38-EL-RDR (August 20, 2019).
37. *In the Matter of the Commission's Investigation into Verde Energy USA Ohio, LLC's Compliance with the Ohio Administrative Code and Potential Remedial Actions for Non-Compliance*, Case No. 19-958-GE-COI, (October 2, 2019).
38. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for an Adjustment to Rider IRP and Rider DSM Rates*, Case No. 19-1940-GA-RDR, (April 20, 2020).
39. *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval to Continue Demand Side Management Program for its Residential, Commercial, and Industrial Customers*, Case No. 19-2084-GA-UNC (August 11, 2020).

INT-02-004. What was the total number of disconnection notices that were provided to residential customers on a monthly basis between March 2020 and June 2020?

**RESPONSE:** VEDO raises three objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

Due to billing system limitations, VEDO was unable to remove the language from customer bills related to disconnect notices. To inform customers of the grace period, VEDO added a bill message to each customer's bill with an outstanding balance to notify customers they would not be subject to disconnection during moratorium. In addition to bill messaging, VEDO took additional steps, using other mediums such as press releases, media interviews, updated websites, and out-bound dialer calls and emails, to communicate the various protections available to customers during the moratorium. In addition to notifying customers of the grace period during the moratorium, the communications encouraged customers to contact the Company about options for payment plan arrangements and payment assistance for which customers may be eligible. Notwithstanding, the aforementioned communications, the below chart provides the number of disconnect notices issued, given it was not technically feasible for the Company to eliminate the notices on the bills due to billing system limitations:

|        | # Disconnect<br>Notices |
|--------|-------------------------|
| Mar-20 | 28,165                  |
| Apr-20 | 25,652                  |
| May-20 | 21,298                  |
| Jun-20 | 19,146                  |

*Answerer: Christine Campbell, Credit Risk Analyst*

INT-02-005. What was the total amount owed for each month between March 2020 and June 2020 that was reflected on the residential disconnection notices?

**RESPONSE:** VEDO raises three objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

Please see the chart below.

|        | Total \$ Owed |
|--------|---------------|
| Mar-20 | \$ 19,828,160 |
| Apr-20 | \$ 14,595,988 |
| May-20 | \$ 10,925,874 |
| Jun-20 | \$ 8,634,846  |

*Answerer: Christine Campbell, Credit Risk Analyst*

## II. INTERROGATORIES

INT-02-001. As of June 30, 2020, what was the total number of residential customers that were eligible to be disconnected for non-payment if the PUCO suspension on disconnections were lifted?

**RESPONSE:** VEDO raises four objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects to this request to the extent that it requires VEDO to speculate regarding future hypothetical actions to be taken by the Company. Fourth, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

There were 25,775 unique residential customers eligible for disconnection as of June 30, 2020.

*Answerer: Christine Campbell, Credit Risk Analyst*



INT-02-002. What was the average disconnection amount for residential customers who were eligible for disconnection for non-payment on June 30, 2020 had the PUCO suspension on disconnections been lifted?

**RESPONSE:** VEDO raises three objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

The average outstanding balance for residential customers who were eligible for disconnection for non-payment on June 30, 2020 was \$451.

*Answerer: Christine Campbell, Credit Risk Analyst*

|  |             |             |             |             |             |             |             |            |             |            |            |            |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------------|-------------|------------|------------|------------|
| <b>Company: Vectren Energy Delivery of Ohio</b><br><b>Year: 2020</b><br><b>GAS PIPP REPORT</b> |             |             |             |             |             |             |             |            |             |            |            |            |
| <b>Enrollment Numbers for Active and Graduate PIPP Programs</b>                                | <b>JAN</b>  | <b>FEB</b>  | <b>MAR</b>  | <b>APR</b>  | <b>MAY</b>  | <b>JUNE</b> | <b>JULY</b> | <b>AUG</b> | <b>SEPT</b> | <b>OCT</b> | <b>NOV</b> | <b>DEC</b> |
| (A) Number of Total Residential Customer Accounts  | 286,889     | 304,538     | 305,500     | 285,680     | 303,912     | 303,539     |             |            |             |            |            |            |
| (B) Number of Total PIPP Accounts  | 9,267       | 9,600       | 9,848       | 9,180       | 9,165       | 9,612       | 0           | 0          | 0           | 0          | 0          | 0          |
| 1) Active, non-Grad PIPP   | 8,972       | 9,390       | 9,540       | 8,890       | 8,897       | 9,360       |             |            |             |            |            |            |
| a) New Enrollees   | 106         | 126         | 49          | 17          | 26          | 25          |             |            |             |            |            |            |
| b) Repeat Enrollees  | 1,555       | 1,295       | 1,063       | 537         | 523         | 749         |             |            |             |            |            |            |
| 2) Graduate PIPP   | 295         | 300         | 308         | 290         | 268         | 252         |             |            |             |            |            |            |
| 3) Percentage of Residential Customers on PIPP   | 3%          | 3%          | 3%          | 3%          | 3%          | 3%          |             |            |             |            |            |            |
| (C) Number of Customers Dropped from Active, Non-Grad PIPP Enrollment                          | 1,661       | 1,380       | 1,273       | 689         | 745         | 1,230       |             |            |             |            |            |            |
| 1) Non-payment   | 0           | 1           | 0           | 0           | 0           | 0           |             |            |             |            |            |            |
| 2) Failure to reverify   | 109         | 76          | 129         | 113         | 173         | 614         |             |            |             |            |            |            |
| 3) Failure to bring account current at anniversary date  | 17          | 19          | 15          | 20          | 29          | 9           |             |            |             |            |            |            |
| 4) Income Ineligible   | 0           | 0           | 0           | 0           | 0           | 0           |             |            |             |            |            |            |
| 5) Other   | 1,535       | 1,284       | 1,129       | 556         | 543         | 607         |             |            |             |            |            |            |
| (D) Number of Customers Dropped from Graduate PIPP Enrollment                                  | 41          | 34          | 27          | 20          | 17          | 11          |             |            |             |            |            |            |
| 1) Non-payment   | 0           | 0           | 0           | 0           | 0           | 0           |             |            |             |            |            |            |
| 2) Completed 12 month Graduate PIPP program  | 9           | 4           | 7           | 6           | 6           | 2           |             |            |             |            |            |            |
| a) Successfully Completed Graduate PIPP  | 5           | 2           | 2           | 1           | 3           | 0           |             |            |             |            |            |            |
| 3) Failure to bring account current upon enrollment  | 3           | 5           | 0           | 3           | 3           | 1           |             |            |             |            |            |            |
| 4) Other   | 24          | 23          | 18          | 10          | 5           | 8           |             |            |             |            |            |            |
| <b>Billing &amp; Payment Amounts for Active PIPP Customers</b>                                 | <b>JAN</b>  | <b>FEB</b>  | <b>MAR</b>  | <b>APR</b>  | <b>MAY</b>  | <b>JUNE</b> | <b>JULY</b> | <b>AUG</b> | <b>SEPT</b> | <b>OCT</b> | <b>NOV</b> | <b>DEC</b> |
| (E) Total Billings for Active PIPP Accounts ( based on usage)                                  | \$883,571   | \$861,388   | \$830,374   | \$579,915   | \$509,659   | \$448,193   |             |            |             |            |            |            |
| 1) Average Total PIPP Bill   | \$98        | \$92        | \$87        | \$65        | \$57        | \$48        |             |            |             |            |            |            |
| (F) Total PIPP Payments Received   | \$428,528   | \$1,314,003 | \$732,275   | \$434,256   | \$393,291   | \$395,907   | \$0         | \$0        | \$0         | \$0        | \$0        | \$0        |
| 1) Customer Payments   | \$408,968   | \$424,711   | \$389,487   | \$363,923   | \$368,029   | \$365,830   |             |            |             |            |            |            |
| 2) E-HEAP payments   | \$17,900    | \$14,049    | \$8,739     | \$1,347     | \$1,243     | (\$323)     |             |            |             |            |            |            |
| 3) HEAP payments   | \$1,660     | \$875,244   | \$334,049   | \$68,986    | \$24,018    | \$30,399    |             |            |             |            |            |            |
| (G) Unrecovered portion of Active PIPP Bills   | \$455,043   | (\$452,615) | \$98,099    | \$145,659   | \$116,368   | \$52,286    | \$0         | \$0        | \$0         | \$0        | \$0        | \$0        |
| 1) Percentage of total billings paid by Active PIPP Customers                                  | 48%         | 153%        | 88%         | 75%         | 77%         | 88%         |             |            |             |            |            |            |
| (H) PIPP Installment Billings  | \$432,951   | \$452,757   | \$476,833   | \$433,724   | \$430,704   | \$464,194   |             |            |             |            |            |            |
| 1) Average PIPP Installment  | \$48.26     | \$48.22     | \$49.98     | \$48.79     | \$48.41     | \$49.59     |             |            |             |            |            |            |
| 2) Percentage of Installment Billings Paid by Active Pipp Customers                            | 94%         | 94%         | 82%         | 84%         | 85%         | 79%         |             |            |             |            |            |            |
| <b>Payments Received and Incentive Credits Awarded</b>   | <b>JAN</b>  | <b>FEB</b>  | <b>MAR</b>  | <b>APR</b>  | <b>MAY</b>  | <b>JUNE</b> | <b>JULY</b> | <b>AUG</b> | <b>SEPT</b> | <b>OCT</b> | <b>NOV</b> | <b>DEC</b> |
| (I) Number of PIPP installment payments received   | 8,864       | 9,152       | 8,659       | 8,070       | 7,945       | 8,363       | 0           | 0          | 0           | 0          | 0          | 0          |
| 1) Active  | 8,641       | 8,908       | 8,403       | 7,818       | 7,744       | 8,204       |             |            |             |            |            |            |
| 2) Graduate  | 223         | 244         | 256         | 252         | 201         | 159         |             |            |             |            |            |            |
| 3) percentage of active PIPP installment payments received                                     | 96%         | 95%         | 88%         | 88%         | 87%         | 88%         |             |            |             |            |            |            |
| 4) percentage of graduate PIPP installment payments received                                   | 76%         | 81%         | 83%         | 87%         | 75%         | 63%         |             |            |             |            |            |            |
| (J) Number of timely and full PIPP installment payments received                               | 5973        | 6280        | 6042        | 5659        | 5758        | 5696        | 0           | 0          | 0           | 0          | 0          | 0          |
| 1) Active  | 5,791       | 6,090       | 5,853       | 5,478       | 5,608       | 5,564       |             |            |             |            |            |            |
| 2) Graduate  | 182         | 190         | 189         | 181         | 150         | 132         |             |            |             |            |            |            |
| 3) percentage of active PIPP installments that are timely and in full                          | 67%         | 68%         | 70%         | 70%         | 72%         | 68%         |             |            |             |            |            |            |
| 4) percentage of graduate PIPP installments that are timely and in full                        | 82%         | 78%         | 74%         | 72%         | 75%         | 83%         |             |            |             |            |            |            |
| (K) Total Dollars of on-time payment incentive credits awarded                                 | \$194,909   | \$232,404   | \$177,202   | \$126,919   | \$105,753   | \$111,325   | \$0         | \$0        | \$0         | \$0        | \$0        | \$0        |
| 1) Active  | \$188,043   | \$223,752   | \$167,675   | \$121,646   | \$101,165   | \$108,108   |             |            |             |            |            |            |
| 2) Graduate  | \$6,867     | \$8,652     | \$9,527     | \$5,273     | \$4,588     | \$3,218     |             |            |             |            |            |            |
| 3) Average Active Credit   | \$32.47     | \$36.74     | \$28.65     | \$22.21     | \$18.04     | \$19.43     |             |            |             |            |            |            |
| 4) Average Graduate Credit   | \$37.73     | \$45.54     | \$50.41     | \$29.13     | \$30.59     | \$24.38     |             |            |             |            |            |            |
| <b>Usage</b>   | <b>JAN</b>  | <b>FEB</b>  | <b>MAR</b>  | <b>APR</b>  | <b>MAY</b>  | <b>JUNE</b> | <b>JULY</b> | <b>AUG</b> | <b>SEPT</b> | <b>OCT</b> | <b>NOV</b> | <b>DEC</b> |
| (L) Average Monthly Mcf Usage of PIPP Customer   | 13.69       | 13.85       | 12.22       | 8.21        | 5.95        | 2.33        |             |            |             |            |            |            |
| (M) Average Monthly Mcf Usage of Non-PIPP Residential Customer                                 | 12.21       | 12.37       | 11.30       | 7.08        | 5.08        | 2.31        |             |            |             |            |            |            |
| <b>Aged/Deferred Recoverable through PIPP Rider</b>  | <b>JAN</b>  | <b>FEB</b>  | <b>MAR</b>  | <b>APR</b>  | <b>MAY</b>  | <b>JUNE</b> | <b>JULY</b> | <b>AUG</b> | <b>SEPT</b> | <b>OCT</b> | <b>NOV</b> | <b>DEC</b> |
| (N) Beginning Balance of Aged PIPP Arrearages  | (\$678,651) | (\$704,789) | (\$889,536) | (\$931,301) | (\$842,677) | (\$764,417) |             |            |             |            |            |            |
| (O) Aged/Deferred Current Month's PIPP Arrearages  | \$252,498   | \$99,531    | \$134,711   | \$216,346   | \$157,739   | \$142,048   |             |            |             |            |            |            |
| 1) Number of months debt is held prior to aging  | 2           | 2           | 2           | 2           | 2           | 2           |             |            |             |            |            |            |
| 2) Administrative costs (if applicable)  | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |             |            |             |            |            |            |
| 3) Revenue sharing (if applicable)   | \$0         | \$0         | \$0         | \$0         | \$0         | \$0         |             |            |             |            |            |            |
| 4) Carrying charges (if applicable)  | (\$844)     | (\$928)     | (\$1,449)   | (\$782)     | (\$245)     | (\$140)     |             |            |             |            |            |            |
| (P) Arrearage Recovery/PIPP Rider  | \$278,637   | \$284,278   | \$176,476   | \$127,722   | \$79,479    | \$31,621    |             |            |             |            |            |            |
| (Q) Ending Balance of PIPP Arrearages  | (\$704,789) | (\$889,536) | (\$931,301) | (\$842,677) | (\$764,417) | (\$653,990) |             |            |             |            |            |            |
| (R) Monthly volumes applicable to PIPP Rider /Mcf  | 5,431.513   | 5,541.480   | 3,440.088   | 2,489.708   | 1,549.289   | 616.401     |             |            |             |            |            |            |
| (S) Approved PIPP Rider Rate in Effect (Mcf)   | \$0.051     | \$0.051     | \$0.051     | \$0.051     | \$0.051     | \$0.051     |             |            |             |            |            |            |

INT-02-003. Between June 1, 2020 and July 30, 2020, what is the total number of residential customers who entered a payment plan with VEDO to avoid delinquency?

**RESPONSE:** VEDO raises three objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

Please see the chart and explanation of terms contained therein below:

|           | Jun-20 | Jul-20 |
|-----------|--------|--------|
| Active    | 1,626  | 1,387  |
| Completed | 62     | 81     |
| Cancelled | 238    | 162    |
| Total     | 1,926  | 1,630  |

- Active Arrangements represent arrangements that are currently in process.
- Completed Arrangements represent arrangements that have been completely satisfied.
- Canceled Arrangements represent arrangements that were either not completely satisfied or canceled by the customer.

*Answerer: Christine Campbell, Credit Risk Analyst*

INT-02-010. For each month from March 2020 to July 2020, what was the total number of active PIPP customers served by Vectren?

**RESPONSE:** VEDO raises two objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

Please see the chart below. The July 2020 data is not yet final and available, as of the date of this Supplemental Response. Please see also VEDO's Objections and Response to INT-02-012.

|        | # Active & Non-Grad PIPP Customers | Graduate PIPP Customers | Total PIPP Customers |
|--------|------------------------------------|-------------------------|----------------------|
| Mar-20 | 9,540                              | 308                     | 9,848                |
| Apr-20 | 8,890                              | 290                     | 9,180                |
| May-20 | 8,897                              | 268                     | 9,165                |
| Jun-20 | 9,360                              | 252                     | 9,612                |

*Answerer: Teresa Cullum, Supervisor Credit & Collections*

INT-02-011. For each month from March 2020 to July 2020, what was the total number of active PIPP customers that made their PIPP payments in-full and on-time?

**RESPONSE:** VEDO raises three objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*



**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

Please see the chart below for March 2020 through June 2020. The July 2020 data is not yet final and available, as of the date of this Supplemental Response.

|        | # Active & Non -<br>Grad PIPP<br>Customers made<br>Payments | Graduate PIPP<br>Customers<br>made<br>Payments | Total PIPP<br>Customers<br>made Payments |
|--------|---|--|--|
| Mar-20 | 5,853   | 189  | 6,042                                    |
| Apr-20 | 5,478   | 181  | 5,659                                    |
| May-20 | 5,608   | 150  | 5,758                                    |
| Jun-20 | 5,564   | 132  | 5,696                                    |

*Answerer: Teresa Cullum, Supervisor Credit & Collections*

INT-02-015. As of June 30, 2020, what was the total amount of residential uncollectible debt that Vectren will not be recovering either directly from customers, through the Uncollectible Expense Rider, or the PIPP Rider?

**RESPONSE:** VEDO raises four objections to this request. First, the request seeks information that is not relevant to the subject matter of the Stipulation and Recommendation, which was filed on June 26, 2020 in this proceeding, or the Testimony of Rina Harris in Support of the Stipulation, which was filed on July 21, 2020 in this proceeding. The Stipulation and Ms. Harris' testimony concern the 2021-2023 Demand Side Management (DSM) program portfolio and funding and the changes to the procedures to review and adjust the Energy Efficiency Funding Rider (EEFR) that the Signatory Parties recommend that the Commission should approve. VEDO similarly objects that this request seeks information that is not reasonably calculated to lead to the discovery of evidence that would be admissible in this proceeding in any testimony by OCC in opposition to said Stipulation. Second, VEDO objects to this request to the extent it seeks information that is not readily available at this time or that VEDO is not required to or does not maintain in the regular course of business in the form requested. Third, VEDO objects that this request is vague and undefined. Fourth, VEDO objects that this request is overbroad and unduly burdensome to answer.

*Answerer: Counsel for VEDO*

**SUPPLEMENTAL**

**RESPONSE:** Subject to and without waiving the aforementioned Objections, VEDO responds as follows:

There are no uncollectible expenses that VEDO does not recover through either the Uncollectible Expense Rider or the Percentage of Income Payment Plan (PIPP) Rider.

*Answerer: Christine Campbell, Credit Risk Analyst*

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**8/11/2020 3:50:35 PM**

**in**

**Case No(s). 19-2084-GA-UNC**

Summary: Testimony Direct Testimony of James D. Williams on Behalf of The Office of The Ohio Consumers' Counsel electronically filed by Mrs. Tracy J Greene on behalf of Healey, Christopher