

THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE COMMISSION'S
CONSIDERATION OF SOLUTIONS
CONCERNING THE DISCONNECTION OF
GAS AND ELECTRIC SERVICE IN WINTER
EMERGENCIES FOR THE 2020-2021
WINTER HEATING SEASON.

CASE NO. 20-1252-GE-UNC

FINDING AND ORDER

Entered in the Journal on August 12, 2020

I. SUMMARY

{¶ 1} The Commission sets forth special reconnection procedures that are effective no later than October 5, 2020, through April 15, 2021, for each gas, natural gas, and electric light company under the Commission's jurisdiction.

II. DISCUSSION

{¶ 2} The gas, natural gas, and electric light companies (utility companies) defined in R.C. 4905.03 are public utilities in accordance with R.C. 4905.02, and, as such, are subject to the jurisdiction of the Commission, pursuant to R.C. 4905.04, 4905.05, and 4905.06.

{¶ 3} R.C. 4909.16 provides, in part, that, in the event of an emergency, when the Commission finds it necessary to prevent injury to the business or interests of the public or of any public utility, it may temporarily alter, amend, or suspend any existing rates or schedules.

{¶ 4} Ohio Adm.Code Chapters 4901:1-10, 4901:1-17, and 4901:1-18 address, among other things, the establishment of credit for residential service, the termination and reconnection of residential service by utility companies, and the natural gas and gas Percentage of Income Payment Plan (PIPP) and Graduate PIPP programs. In addition, Ohio Adm.Code Chapter 122:5-3 addresses the electric PIPP and Graduate PIPP programs. PIPP is a program for low-income customers who meet certain qualifications, including having a household gross yearly income at or below 150 percent of the federal poverty guidelines, to pay a reduced gas and/or electric utility bill. Effective November 1, 2010, all of these

administrative code chapters were revised to allow for a PIPP Plus and Graduate PIPP Plus program, which provides that, when a customer pays the monthly payment on time and in full, two types of credits (a credit towards any old debt and towards the rest of that month's billed amount) are applied to the customer's account, thus, incenting the customer to make regular payments.

{¶ 5} For more than a decade, prior to each winter heating season, the Commission has voiced concerns about residential customers who have had their gas and/or electric utility service disconnected during the winter because they are unable to pay their bills due to limited financial resources and who have been unable to have these services restored because of unpaid balances. Pursuant to R.C. 4909.16, the Commission has determined each year that, in order to prevent injury to these residential customers, it was in the public interest to issue special reconnect procedures for the winter heating season. The Commission also notes that energy efficiency and conservation programs, such as the Home Weatherization Assistance Program, have assisted residential customers in controlling their utility bills. These programs, in concert with the financial assistance afforded residential customers through orders such as this one, provide much needed support for residential customers, including customers residing in multi-family housing and low-income customers.

{¶ 6} For the 2020-2021 winter heating season, October 5, 2020, through April 15, 2021,¹ the Commission expects that the utility companies under our jurisdiction will assist customers in every way possible to maintain their service for heating purposes. We expect these utilities to advertise, as much as practicable, the availability of the standard payment plans provided by Commission rule, as well as the availability of the PIPP Plus program. Moreover, the Commission expects the utilities to err on the side of maintaining service when there is a doubt as to the applicability or the interpretation of a rule.

¹ The 2020-2021 winter heating season is defined for limited purposes set forth in this Order.

{¶ 7} In addition, upon consideration of the upcoming 2020-2021 winter heating season, the Commission again finds it necessary and prudent to invoke the emergency provisions of R.C. 4909.16 in order to prevent injury to affected residential customers and support the public interest. We continue to be concerned about those residential customers who have had their gas and/or electric utility service disconnected because of limited financial resources or who have a disconnection notice because they are unable to pay their bills. While the Commission believes the residential service rules have substantially assisted customers to keep energy service, in spite of their financial situation, we are aware of the fact that a number of Ohio citizens will enter the winter season without utility service for heating purposes.

{¶ 8} Further, the Commission notes the importance of Executive Order 2020-01D (Executive Order), which the governor signed on March 9, 2020, declaring a state of emergency in Ohio to protect the well-being of Ohioans from the dangerous effects of COVID-19. As described in the Executive Order, state agencies are required to implement procedures consistent with recommendations from the Department of Health to prevent or alleviate the public health threat associated with COVID-19. Additionally, all citizens are urged to heed the advice of the Department of Health regarding this public health emergency in order to protect their health and safety. The Executive Order was effective immediately and will remain in effect until the COVID-19 emergency no longer exists.

{¶ 9} We find that the factors discussed in Paragraphs 7 and 8 constitute a continuing emergency. Accordingly, the Commission issues this Order to effectuate the special reconnection procedures for the 2020-2021 winter heating season.

A. *Special Provisions for the 2020-2021 Winter Heating Season*

{¶ 10} Pursuant to R.C. 4909.16, in order to prevent injury and support the public interest, we direct utility companies under our jurisdiction for the 2020-2021 winter heating season to reconnect the services of those who have had their services disconnected for nonpayment or to maintain services in accordance with the directives set forth in this Order.

{¶ 11} Effective dates of the procedures in this Order: A customer can only use the special procedures provided in this Order once from October 5, 2020, through April 15, 2021, to:

- (a) reconnect service under the special reconnection procedures, if the service has been disconnected for nonpayment;
- (b) avoid the disconnection of service under the special maintenance procedures; or
- (c) request the connection of new service under the other special procedures.

{¶ 12} Initial requirements to restore or maintain service: A customer seeking to have service restored or maintained must do one of the following, whichever is less:

- (a) pay his/her delinquent amount, as set forth in Ohio Adm.Code 4901:1-18-07(A)(1) and (A)(2);
- (b) cure any default that he/she may have incurred on a standard payment plan provided pursuant to Ohio Adm.Code 4901:1-18-05, if the customer is on such a plan; or
- (c) pay \$175 plus a reconnection charge of up to \$36 if applicable. Funds for this payment may come in whole or in part from the Winter Crisis Program or other energy assistance programs.

{¶ 13} Reconnection charge: A reconnection charge, as described in Ohio Adm.Code 4901:1-18-07(C), shall not be assessed by the utility company, unless the company has actually disconnected the service. The utility company may assess a collection charge if the collection charge is part of the utility company's approved tariff.

{¶ 14} What is included in the \$175: The \$175 payment includes any security deposit a utility company may require. The utility company may add the company's approved tariff reconnection charge to this amount, up to \$36. If the company's approved tariff reconnection charge is greater than \$36, the balance of the reconnection charge may be billed to the customer the following month.

{¶ 15} Payment plans and remaining balance with \$175 payment: At the time the special reconnection procedures are invoked, a customer who is not enrolled in PIPP Plus who pays the \$175 shall be enrolled in a standard extended payment plan provided for in Ohio Adm.Code 4901:1-18-05, or the customer shall be offered all extended payment plans consistent with Ohio Adm.Code 4901:1-18-05 and the procedures for enrollment by the next billing cycle. The utility company shall place the remaining unpaid balance into a standard extended payment plan so that the customer can begin making payment under the terms of the agreed plan beginning with the next billing cycle, as if it were a new plan, subject to the arrearages already incurred.

{¶ 16} Apportionment of the \$175 between regulated utility companies: If the customer's gas and electric service have both been disconnected for nonpayment or have disconnection notices and different utility companies provide these services, the utility companies involved may come to an agreement as to the apportionment of the \$175 between them. If an agreement cannot be reached, the utility companies shall apportion the \$175 based upon a ratio of the arrearages the customer owes each company. If the same company provides both of these services, then the \$175 should be apportioned based upon a ratio of the arrearages the customer owes for each service.

{¶ 17} New service address: A customer requesting service at a new address who has an outstanding balance with the utility company can establish new service upon payment of \$175. The customer must also enter into a payment arrangement on the balance before service is connected, in either one of the standard extended payment plans provided for in Ohio Adm.Code 4901:1-18-05(B), or, if eligible, in the PIPP Plus program, whichever

is the most appropriate for the customer. If this outstanding balance is a PIPP Plus default, the customer must follow the process set forth in Paragraph 22.

{¶ 18} New service with no balance and security deposit: A customer requesting new service with no previous outstanding balance may establish new service upon payment of \$175, in lieu of paying the required security deposit, if the required security deposit would be more than \$175. When the customer elects this option, the utility company may add the remaining balance of the required security deposit to the customer's next bill. If the required security deposit is less than \$175, the utility company shall not count the customer's payment of the lesser amount as the customer's one-time use of the special reconnection procedures described above.

{¶ 19} Multiple residential accounts: A customer with multiple residential accounts who wishes to utilize the Winter Reconnect Order to maintain or reconnect service may do so only at the property where the customer resides. In addition to payment of \$175 to maintain or reconnect service, the customer must enter into a payment arrangement on the balance of that residential account, in either a standard extended payment plan provided for in Ohio Adm.Code 4901:1-18-05(B), or, if eligible, in the PIPP Plus program, whichever is the most appropriate for the customer.

{¶ 20} Fraudulent practice or tampering: A customer who has had his/her gas and/or electric service disconnected due to a fraudulent practice or tampering shall have that service reconnected upon payment for the amount of service obtained fraudulently, plus any investigation fee or nonsufficient fund check charge under the company's approved tariff, plus any defaulted amount not to exceed \$175, plus the company's approved tariff reconnection charge, up to \$36. If the company's approved tariff reconnection charge is greater than \$36, the balance of the reconnection charge may be billed to the customer the following month.

{¶ 21} Insufficient funds prior to the effect of this Order: The act of a customer who makes payment by check to avoid the disconnection of his/her gas and/or electric service

immediately prior to the start of the special winter heating procedures, and whose check is then returned for insufficient funds after the special procedures are in effect, will be considered a fraudulent practice. A customer under these specific circumstances shall be able to avoid disconnection by paying the amount of the returned check, plus the company's approved tariff return check charge(s), plus any defaulted amount not to exceed \$175 prior to disconnection. If the customer's gas and/or electric service are disconnected, then the procedures set forth in Paragraph 20, for disconnection due to a fraudulent practice, will apply.

{¶ 22} Reenroll or maintain PIPP Plus or Graduate PIPP Plus: To reenroll or maintain active status in PIPP Plus or Graduate PIPP Plus, as soon as the \$175 payment is made, the utility company shall place the remaining unpaid balance into the PIPP Plus or Graduate PIPP Plus program arrearages. Thus, the customer can begin making the established PIPP Plus or Graduate PIPP Plus program payment beginning with the next billing cycle and be eligible to receive incentive credits for on-time and in-full payments. The time period is not extended to participate in Graduate PIPP Plus.

{¶ 23} Reconnection and arrearage treatment for PIPP Plus or Graduate PIPP Plus: For any existing PIPP Plus or Graduate PIPP Plus program customer who requests reconnection under the special reconnection procedures, as soon as the \$175 payment for reconnection is paid, the utility company shall place the remaining unpaid balance into the PIPP Plus or Graduate PIPP Plus program arrearages for that customer so that the customer can begin making the established PIPP Plus or Graduate PIPP Plus program payment beginning with the next billing cycle, as if it were a new plan, subject to the arrearages already incurred. For customers disconnected for fraudulent practice, the payments required in Paragraph 20 will apply.

{¶ 24} Application for Home Energy Assistance Program (HEAP) required: Households that meet the federal income guidelines must apply for regular HEAP.

{¶ 25} Procedures for applying for Winter Crisis: A customer who schedules an appointment, as confirmed by fax or electronic communication sent by a Local Energy Assistance Provider (i.e., community action agency, community based organization) to a utility company, in order to apply for Winter Crisis, and who has not utilized the provisions of this Order, shall be granted a reprieve from disconnection until five business days after the appointment. If the utility company has not received confirmation of a Winter Crisis benefit by the start of the sixth business day following the customer's appointment, the utility may proceed with disconnection procedures. The Local Energy Assistance Provider shall also notify the utility company daily by fax or electronic communication concerning any missed appointments. As confirmed by fax or electronic communication sent by a Local Energy Assistance Provider to a utility company, if the customer misses his/her appointment with the Local Energy Assistance Provider, the utility company may proceed with disconnection procedures.

{¶ 26} Customer notice: Each utility company shall, in writing, by bill insert, or any other form of customer communication, notify its customers whose service continues to be disconnected because of nonpayment that such customers may have their service restored consistent with the procedures set forth herein.

{¶ 27} Notice to customers inquiring about disconnection or payment arrangements: Utility companies must inform a residential customer of the payment plan options under Ohio Adm.Code 4901:1-18-05, or similar provisions, and other available payment plans and options for financial assistance, as well as all of the payment plan options provided by the Commission herein, when the customer contacts the utility company concerning the disconnection of service or payment arrangements.

{¶ 28} Customers not utilizing the Order: With regard to the maintenance or reconnection of service for existing customers who do not utilize the special reconnect procedures, the Commission notes that the intent of the special reconnection procedures is to permit customers, with an outstanding balance greater than \$175, who have been

disconnected or who are facing disconnection, to pay less than their balance to have their service restored or maintained. Therefore, when an existing residential customer makes a payment of less than \$175, which cures any default previously owed to the utility company in order to maintain service, or requests reconnection of service, the utility company shall not count this payment as the customer's one-time use of the special reconnection procedures.

{¶ 29} Reconnection process to be followed: With regard to reconnection of service, the utility company involved shall reconnect service as described in Ohio Adm.Code 4901:1-18-07(A) and (B), which provides that a customer whose service has been disconnected for nonpayment for ten business days or less can request service be reconnected the same business day by providing proof of payment by 12:30 p.m. If payment is made after 12:30 p.m., the service will be reconnected the following business day. However, where a customer's service has been disconnected for nonpayment for more than ten business days, the reconnection of the customer's service will be scheduled as if it is a request for new service in accordance with Ohio Adm.Code Chapters 4901:1-10 and 4901:1-13.

{¶ 30} Enforcement of these procedures: If the Commission determines that a utility company is not following these procedures, we will take those steps we deem appropriate to protect the customers served by that utility.

{¶ 31} Collaboration with nonregulated utilities: The Commission recognizes that its jurisdiction does not extend to those utilities owned or operated by municipalities, nor do we regulate cooperatives. However, we hope these entities will adopt the program laid out above so that together we can limit the number of Ohioans who will suffer from a lack of heat this winter.

B. Application for Energy Assistance and Weatherization Programs

{¶ 32} Ohio Adm.Code 4901:1-18-12(C) requires anyone applying for the PIPP Plus program to also apply for all energy assistance and weatherization programs for which

he/she is eligible. Included among these programs is the Home Weatherization Assistance Program, administered by the Ohio Development Services Agency (ODSA).

{¶ 33} The Commission finds that the utility companies subject to the jurisdiction of this Commission should continue to assist the ODSA by providing the data requested in ODSA's customer information report.

{¶ 34} As a final matter, the Commission notes that PIPP Plus program customers are required to apply for weatherization services. If a customer refuses weatherization, he/she will be removed from the PIPP Plus program.

C. Data Collection

{¶ 35} In order to monitor and gather data to aid the Commission in evaluation of winter heating season disconnections of service, the Commission needs to collect data on all disconnection, including non-heating season disconnection. We need to track the number of customers who have gas and/or electric service reconnected each month, the types of payment plans entered into, and the length of time that customers were without gas and/or electric utility services. To aid us in making winter heating season determinations regarding the public interest, each utility company under the Commission's jurisdiction is directed to complete the Winter Reconnect Order Report, attached to this Finding and Order as Appendix A, and electronically submit it to Staff each month. Each utility company, with the exception of small gas companies, should upload its Winter Reconnect Order Report data to the Commission's database by the 20th of the following month, except that data for October 2020 shall be reported with the data for November 2020. Small gas companies should file monthly data by either uploading their Winter Reconnect Order Report data to the Commission's database or through the Excel template provided by the Commission. Also attached to this Finding and Order is Appendix B, in which Staff summarizes and analyzes information submitted by the utility companies to the Commission for the 2019-2020 winter heating season.

III. ORDER

{¶ 36} It is, therefore,

{¶ 37} ORDERED, That, effective no later than October 5, 2020, each utility company under the Commission's jurisdiction shall restore the service of those customers whose gas or electric utility service has been disconnected for nonpayment, in accordance with the terms set out in this Order. It is, further,

{¶ 38} ORDERED, That, effective no later than October 5, 2020, each utility company under the Commission's jurisdiction shall maintain the service of those customers who have received a notice that their service is to be disconnected for nonpayment, in accordance with the terms set out in this Order. It is, further,

{¶ 39} ORDERED, That, effective no later than October 5, 2020, each utility company under the Commission's jurisdiction shall establish service for customers who request new service, in accordance with the terms set out above. It is, further,

{¶ 40} ORDERED, That the utility companies comply with the Commission's directives set forth in this Finding and Order. It is, further,

{¶ 41} ORDERED, That the special procedures in this Order to maintain, reconnect, or establish service are available to a customer only once from October 5, 2020, through April 15, 2021. It is, further,

{¶ 42} ORDERED, That each utility company under the Commission's jurisdiction provide the data requested in Paragraph 35 and Appendix A to this Finding and Order, for the preceding month by the 20th day of the following month, except that data for October 2020 shall be reported with the data for November 2020. It is, further,

{¶ 43} ORDERED, That a hard copy of this Finding and Order be served upon each gas company, natural gas company, and electric distribution utility, and all other interested persons of record. It is, further,

{¶ 44} ORDERED, That a copy of this Finding and Order be sent to the electric-energy and gas-pipeline industry service lists.

COMMISSIONERS:

Approving:

Sam Randazzo, Chairman

M. Beth Trombold

Lawrence K. Friedeman

Daniel R. Conway

Dennis P. Deters

JML/hac

Appendix A

Winter Reconnect Order (WRO) Report

Customer Profile of WRO Use

- A) Number of Total Residential Customer Accounts
- B) Number of Total PIPP Accounts
- C) Number of non-PIPP Accounts
- D) Number of customers on extended payment plans
- E) Total number of residential customer accounts that used WRO
 - a. Percent of residential customers using WRO
- F) Number of PIPP customer accounts that used WRO
 - a. Percent of PIPP customers using WRO
- G) Number of non-PIPP customer accounts that used the WRO
 - a. Percent of non-PIPP customers using WRO
- H) Number of non-PIPP customer accounts that used WRO and received Winter Crisis
- I) Number of customers on extended payment plans that used WRO
 - a. Percent of customers on extended payment plans that used WRO

Reasons for WRO Use

- J) PIPP Customer Accounts that used WRO
 - 1) Avoid Disconnection
 - 2) Re-establish service
 - 3) Percent used to avoid disconnection
 - 4) Percent used to re-establish service
- K) Non-PIPP Customer Accounts that used WRO
 - 1) Avoid Disconnection
 - 2) Re-establish service
 - 3) Establish service for a new customer
 - 4) Percent used to avoid disconnection
 - 5) Percent used to re-establish service

Enrollment on PIPP or Extended Payment Plan Upon WRO Use

- L) Number of customers placed on extended payment plan within 30 days of invoking use of WRO
- M) Number of customers newly enrolled in PIPP within 30 days of invoking use of WRO

Arrearage Balance Upon WRO Use

- N) Non-PIPP Only: The payment plan dollar amount entered into as a result of the WRO
- O) PIPP Only: The dollar amount added to PIPP Arrearage

Length of Time Without Service Upon WRO Use

- P) Number of customers disconnected for 10 days or fewer
- Q) Number of customers disconnected for 11-30 days
- R) Number of customers disconnected for 31-90 days
- S) Number of customers disconnected for 91 days or more

**WINTER RECONNECT ORDER REPORT
&
WINTER RECONNECTION ORDER RECOMMENDATIONS
FOR 2020-2021**

By
Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio

Introduction

The following report is an analysis of the Winter Reconnect Order (WRO) data submitted for the 2019-2020 winter heating season. Staff was asked to examine the data regarding customers who used the winter procedures ordered by the Commission to avoid disconnection or to reconnect gas and/or electric service during this time. Facing the prospect of losing utility service or continuing without service during the cold weather months constitutes an emergency for Ohio families. This situation has caused the Commission to issue a Winter Reconnect Order each year since 1984. The following report is an analysis of data submitted to the Public Utilities Commission of Ohio by the following utility companies:

Cleveland Electric Illuminating (CEI)	Duke Energy Ohio (Duke)
Dayton Power and Light (DPL)	Northeast Ohio Gas (NEOG)
Ohio Edison (OE)	Ohio Gas (OG)
Ohio Power (OP)	Piedmont Natural Gas (Pied.)
Toledo Edison (TE)	Pike Natural Gas (Pike)
Columbia Gas of Ohio (CGO)	Suburban Natural Gas (SNG)
Dominion Energy Ohio (DEO)	Vectren Energy Delivery of Ohio (VEDO)

Each of the above utility companies submitted a Winter Reconnect Order metrics report (**Appendix A 19-1472-GE-UNC**) containing information pertaining to the customers who used the winter reconnect procedures. The following numbers represent the sum totals for the above companies for the term of the winter reconnect procedures effective October 14, 2019 through May 1, 2020 (due to the pandemic emergency order the winter reconnect order was extended to May 1, 2020):

- Total number of residential customers who avoided disconnection or re-established service using the WRO: **196,715**
- Total number of residential customer accounts that used the WRO to avoid disconnection: **141,526**
- Number of non-PIPP customer accounts that used the WRO: **136,470**
- Number of PIPP accounts that used the WRO: **60,245**
- Number of non-PIPP customer accounts that used the WRO and received E-HEAP: **6,787**
- Number of customers on extended payment plans that used the WRO: **57,905**
- Number of customers newly enrolled in PIPP Plus within 30-days of invoking the WRO: **11,927**

- Number of customers placed on an extended payment plan within 30-days of invoking the WRO: **88,160**
- Dollar amount owed for non-PIPP customers after the \$175 has been paid:
\$ \$72,671,721.97
- Dollar amount added to PIPP Plus Arrearage: **\$6,677,904.00**
- Number of customers disconnected for 10 days or fewer: **20,363**
- Number of customers disconnected for 11-30 days: **2,473**
- Number of customers disconnected for 31-90 days: **4,473**
- Number of customers disconnected for 91 days or more: **41,552**

WINTER RECONNECT ORDER

This report examines the number of accounts that used the WRO during the 2019-2020 winter heating season. The 2019-2020 data indicates that of the approximately seven million residential customers in Ohio served by regulated utilities 196,715 (3 percent) customer accounts benefited from the WRO. Staff notes that although the WRO was extended an additional 14-days, fewer customers utilized it than last year (217,494). Staff notes that due to the emergency order that went in effect on March 13, 2020, there was a 72 percent decrease in the number of customers who utilized the WRO in March 2020 in comparison to March 2019. In March 2019, the number of customers who utilized the WRO was 33,304 compared to 18,150 who utilized the order in March 2020.

The data further indicates that of the 196,715 customers who utilized the WRO, 72 percent did so in order to avoid disconnection; therefore, they never went without service. Of the customers (55,189) who were disconnected, 37 percent (20,363) were able to reconnect service within ten days under the terms of the WRO.

DATA ANALYSIS

This section of the report includes charts depicting staff's analysis of the data the utility companies provided concerning the 2019-2020 winter heating season (October 14, 2019 – May 1, 2020).

Chart 1 below reflects participation levels over the last five winter heating seasons. During the most recent winter season, 196,715 households utilized the WRO. Overall, the number of customers who have utilized the WRO over the last five winter heating seasons has decreased by 20 percent and PIPP Plus utilization has decreased by 34 percent. The decrease in PIPP Plus utilization of the WRO may be a direct result of the overall decline in PIPP Plus enrollment in recent years.

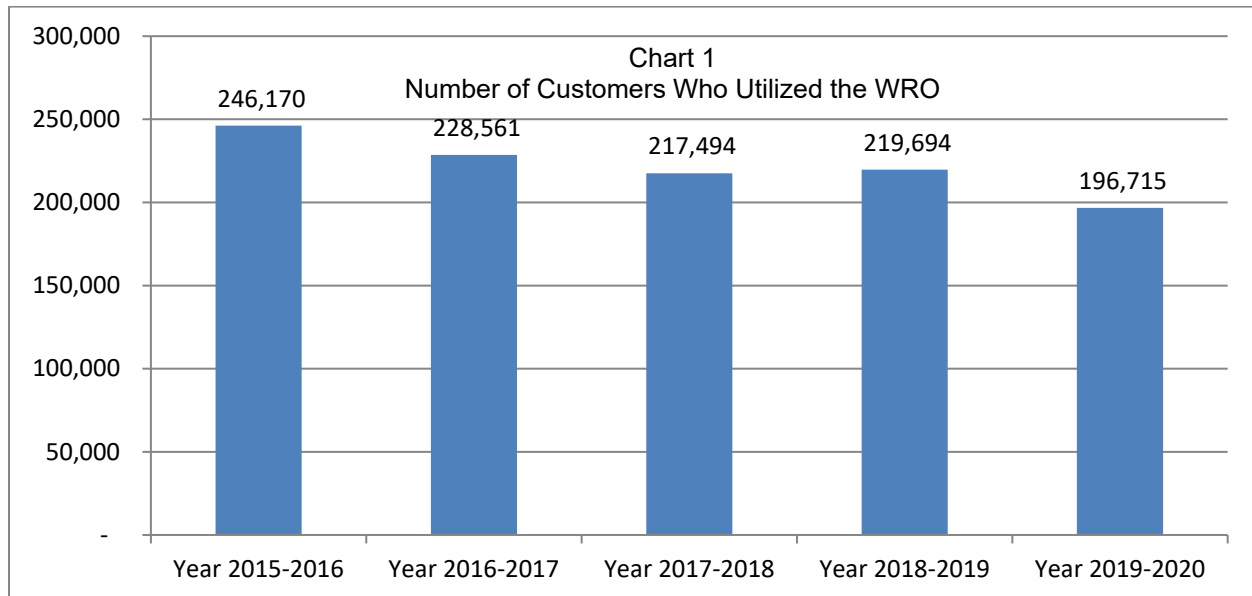


Chart 2 below compares the average number of residential accounts to the number of accounts (per utility) who utilized the WRO. In comparison to the actual number of accounts per utility the number of customers who utilize the WRO is relatively small. However, without the benefit of the WRO, these customers would have either lost their utility service or been unable to have service reconnected without full payment of the past due amount.

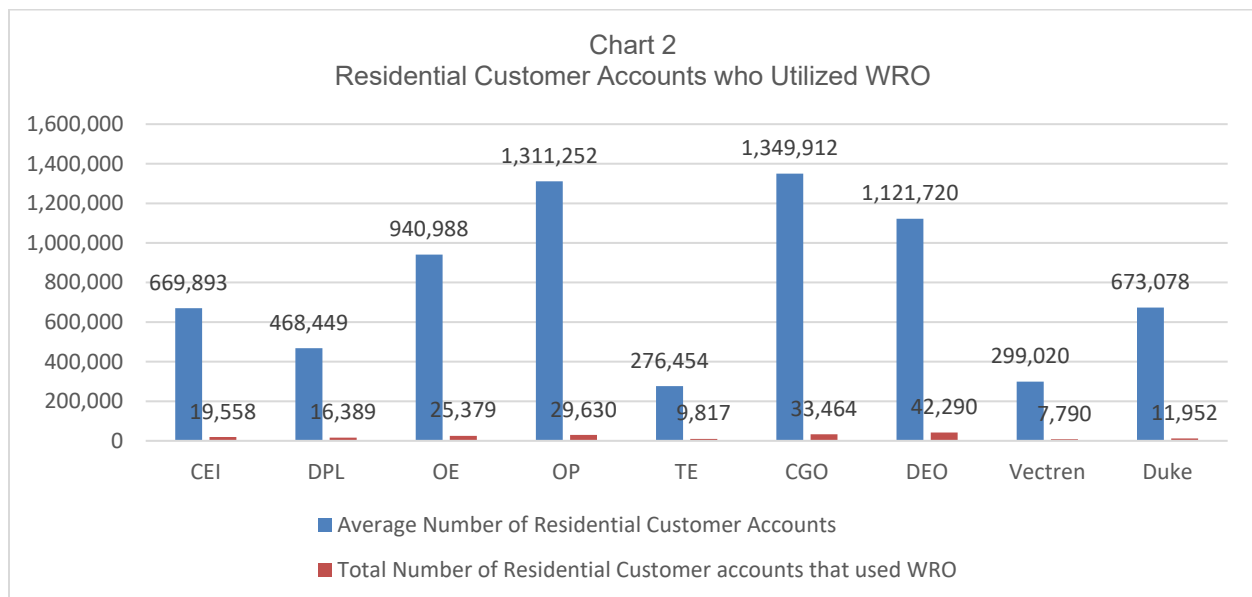


Chart 3 illustrates the number of persons (by utility type) who avoided disconnection versus the number of persons who utilized the Winter Reconnect Order to reconnect their services. Of the total number of customers (196,715) who utilized the WRO; only 22 percent (43,657) used the order to reconnect their utility service. The majority of customers who used the WRO did so to maintain utility service, thereby eliminating the need for the utility to dispatch a technician to disconnect service and then return to reconnect service once the \$175 is paid. This feature of the Winter Reconnect Order reduces overall costs to the rate payer.

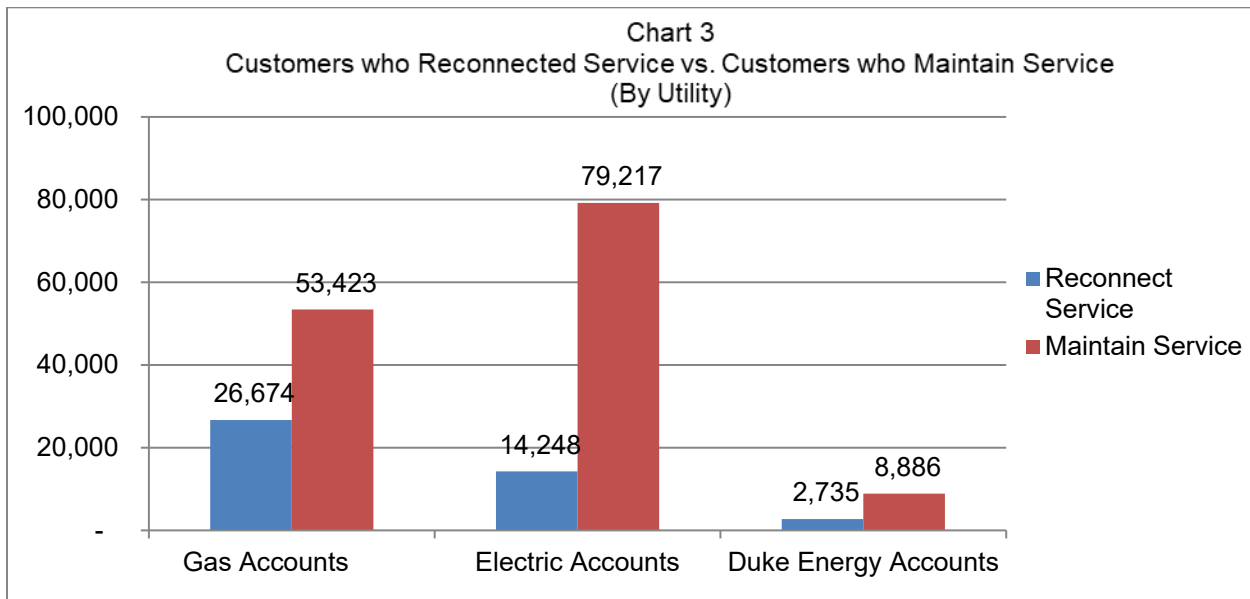


Chart 4 below identifies the type of customers who utilized the WRO (non-PIPP Plus, PIPP Plus and non-PIPP Plus who received assistance through the Winter Crisis Program). Of the 196,715 customers who utilized the WRO, 69 percent (136,470) were non-PIPP Plus customers, 30 percent (60,245) were enrolled on PIPP Plus at the time they used the WRO and 3 percent (6,787) received assistance through the Winter Crisis program. Customers who receive winter crisis assistance but were not eligible for PIPP Plus had income that was above the 150-percent income requirement for PIPP Plus but was below the 175-percent federal income guidelines. This group is often referred to as the “working poor”.

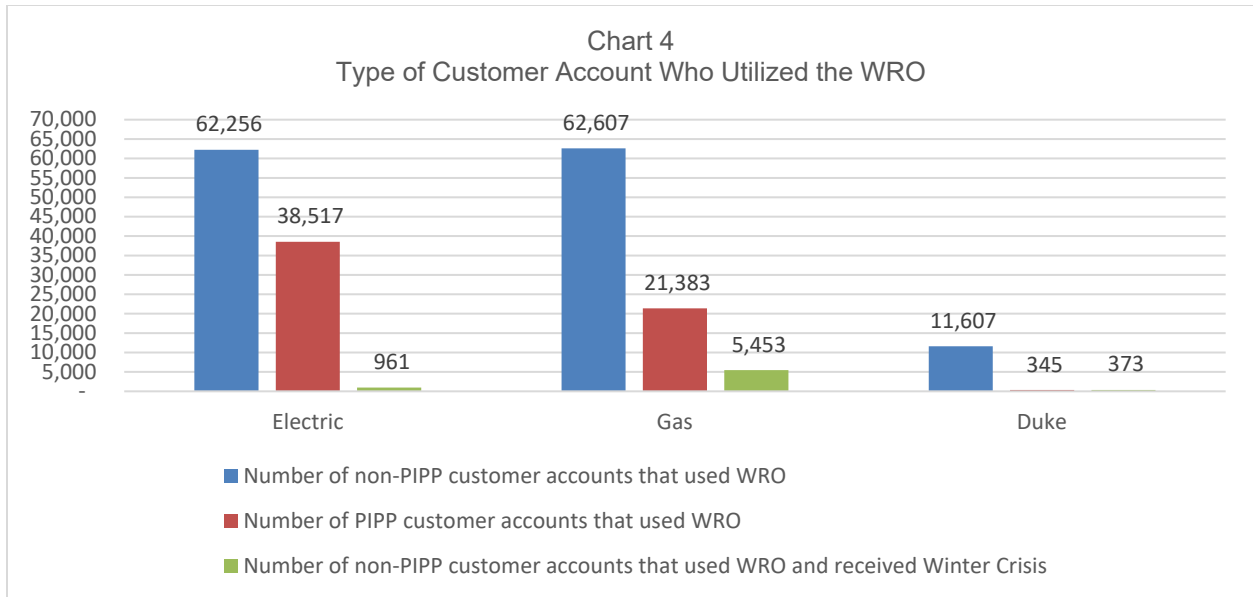
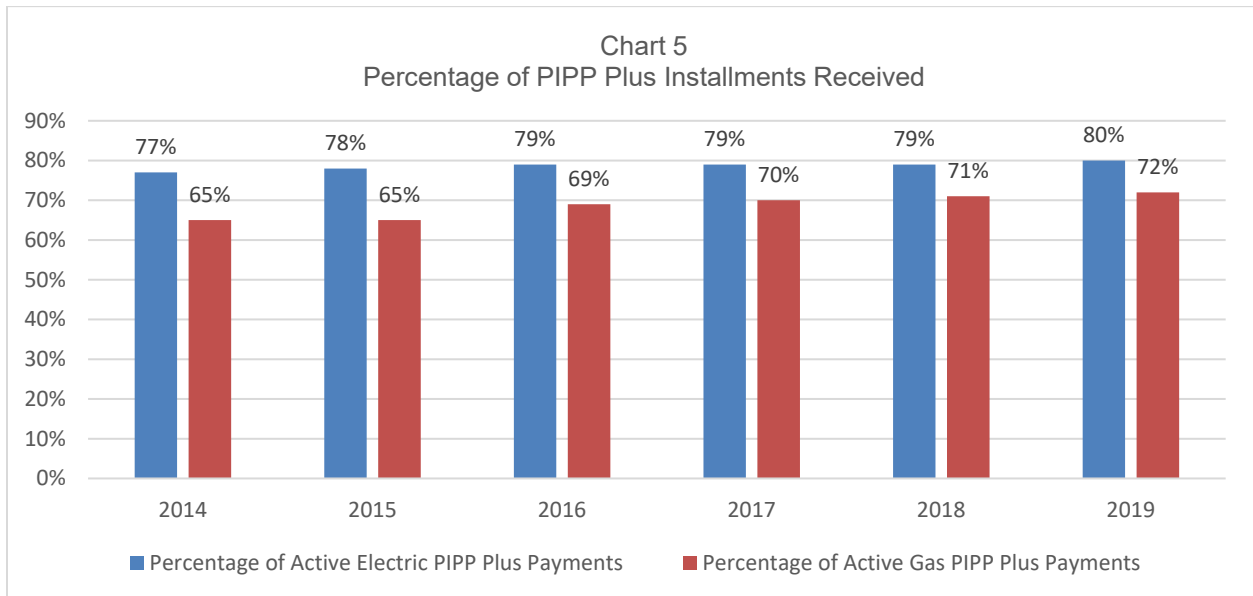


Chart 5 below represents the percentage of payments received from active (electric and gas) PIPP Plus customers since 2014. PIPP Plus customers are now making more consistent payments and benefitting from the arrearage crediting incentives which has directly reduced the number of PIPP Plus customers who utilize the WRO.

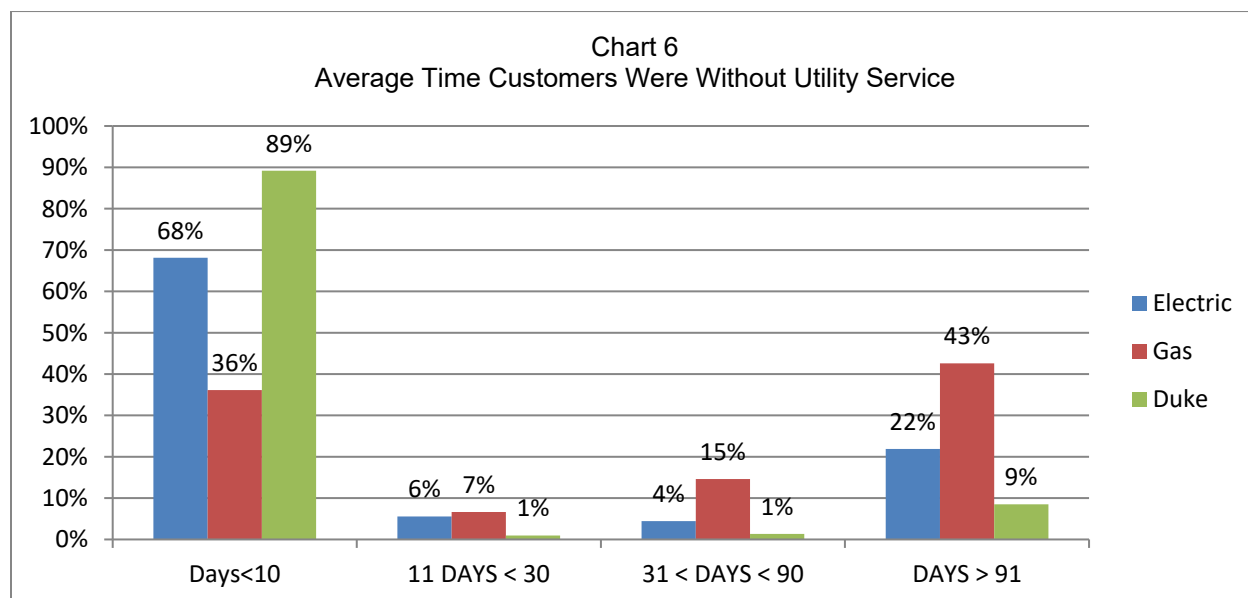


LENGTH OF DISCONNECTION

The data below indicate that natural gas customers tend to remain without service longer than electric customers, specifically during the summer months. While 43 percent of natural gas customers were without service for more than 91 days, only 22 percent of electric customers fall

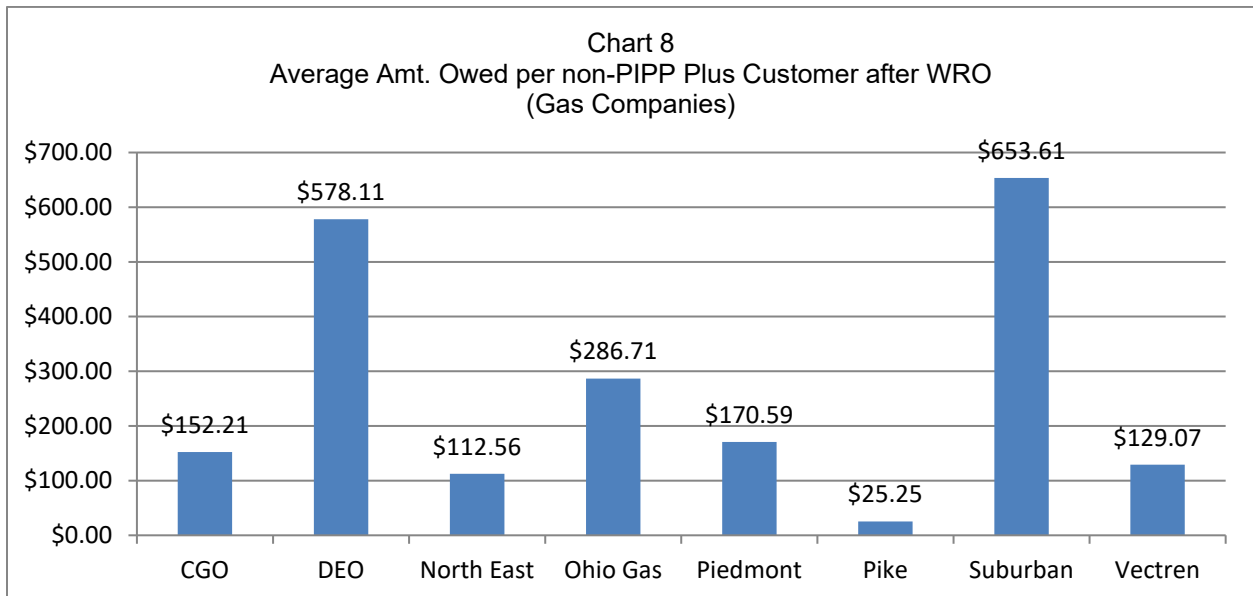
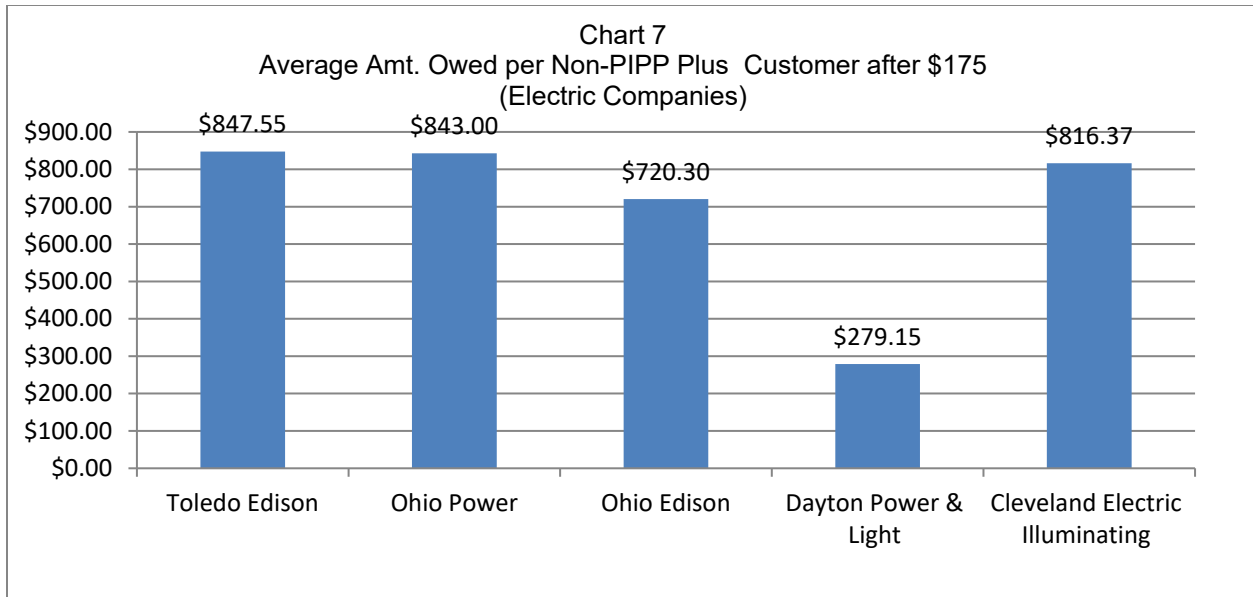
in this same category. Of the Duke Energy customers who utilized the WRO to reconnect service, 89 percent (electric and gas) reconnected in ten days or less. This further suggests that people find gas service to be more expendable than electric service during the summer months.

Chart 6 below reflects the amount of time that gas, electric, and Duke Energy (combination utility) customers were out of service before using the WRO to have their service reconnected. As the chart indicates, 68 percent of the reconnected electric customers had been without service for 10 days or less, compared to 36 percent of the reconnected gas customers who had been out of service for that short a period. If customers had been without service for more than ten days, they tended to stay off longer and not reconnect service until after 91 days had passed suggesting that these customers rely on the use of the WRO. In the Duke Service territory, only 9 percent of its combination utility customers were without service for more than 91 days. As shown in the bar chart, 89 percent of Duke's customers re-establish their service within ten days or less.



AMOUNT OWED AFTER USE OF WINTER RECONNECT ORDER

Charts 7 and 8 below depict the average amount owed per non-PIPP Plus customer after making the \$175 payment. The average amount owed by non-PIPP Plus electric customers after using the WRO was \$701 while the average amount owed by non PIPP Plus gas customers after using the WRO was \$260. Non-PIPP Plus customers who utilize the WRO are required to enroll on an extended payment plan to cure any remaining debt owed to the utility company. Non-PIPP Plus customers have the option of enrolling on the 1/6th payment plan, the 1/9th payment plan or the winter heating season plan. PIPP Plus customers are required to pay the balance of their defaulted PIPP Plus installments by the due date of the next bill in order to re-join PIPP after utilizing the WRO.



**Columbia Gas data reflects the amount that the customer owed in order to enroll in the payment plan not the actual total account balance.*

Duke, which does not appear in either of the Gas or Electric charts above, logged an \$805 average amount owed after the \$175 payment.

CONCLUSIONS AND RECOMMENDATIONS

As in the past, Staff is concerned about those customers/households who will find it difficult to afford their energy bills as we move into the winter months. These households may be faced with disconnection due to arrearages they are unable to pay because of limited financial resources and the increase in energy demands as people continue to work from home due to the COVID-19 pandemic.

Energy utility service is vital to Ohioans, especially during the winter months. Approximately 6 percent (5,450) of the gas customers who utilized the WRO are considered the “working poor” (income fell between 151 percent and 175 percent of the Federal Income Guidelines).

According to the Ohio Poverty Report issued by the Ohio Development Services Agency (February 2019), an estimated 14.6 percent of Ohio families are poor based on the federal income guidelines. Therefore, many Ohioans have come to rely on the availability of the WRO as the only option when facing a financial crisis to maintain utility service during the winter months. By reissuing the WRO, gas and electric utility customers will have the opportunity to maintain or reestablish their energy service during the winter months.

It is for these reasons that Staff recommends that the Commission issue the WRO for the 2020-2021 winter heating season, which will allow customers to use the winter procedures to avoid disconnection or to reconnect gas and/or electric service once during that period.

The winter reconnection order should begin Monday, October 5, 2020, allowing non-HEAP eligible customer’s adequate time to reestablish service with their utility company prior to the release of federal funds. This additional time will also ease the reconnection scheduling burden for the utility companies. The Home Energy Assistance Program (HEAP) winter crisis program will begin on Monday, November 2, 2020.

Accordingly, Staff recommends, based upon the information provided, that the Commission again issue the Winter Reconnect Order with the following specifications:

1. Reissue the Winter Reconnect Order for the 2020-2021 winter heating season (Monday, October 5, 2020 through Thursday, April 15, 2021) and set the ceiling amount to retain or reestablish utility service at \$175 (which aligns with the available ceiling amount of the Winter Crisis program), plus any applicable reconnection charge (not exceeding \$36 per utility). If the tariffed reconnection charge is more than \$36, the balance may be billed to the customer the following month. PIPP Plus or PIPP Plus eligible gas and electric customers should be allowed to retain or reconnect service for a payment of \$175.

Require the utilities to place the remaining unpaid balance (PIPP Plus default) into the PIPP Plus program arrears when a \$175 payment is made. The customer should begin paying either his/her established PIPP Plus amount or the terms of the agreed-upon, extended payment plan by the due date of the customer’s next bill. Extended payment plans should be

as prescribed in Ohio Admin. Code 4901:1-18-05 or any plans approved in the company's transition plan associated with Case No. 20-591-AU-UNC.

2. If the customer's gas and electric service are threatened with disconnection or are disconnected for nonpayment and different utility companies provide these services, the utility companies involved should split the \$175 (either by apportionment based on the arrearages or split equally between the two utilities). For Duke customers who receive both gas and electric service from the company, the \$175 should be apportioned based upon a ratio of the arrearages the customer owes for each service. Any remaining unpaid balance (PIPP Plus default) shall be placed into the PIPP Plus program arrears when a \$175 payment is made. Thus, the customer could begin making the established PIPP Plus program payment beginning with the next billing cycle and be eligible to receive incentive credits for on-time and in-full payments. The customer should begin paying either his/her established PIPP Plus amount or the terms of the agreed-upon, extended payment plan during the next billing cycle. Extended payment plans are prescribed in Ohio Admin. Code 4901:1-18-05.
3. The \$175 should cover any deposit amount required by the utility company. Customers who are requesting new service with no previous balance may utilize the Winter Reconnect Order to pay the required security deposit if it is more than \$175. If the deposit is larger than \$175, the balance may be billed to the customer the following month. The customer will be connected per Ohio Admin. Code 4901:1-13-05 (A) for gas and 4901:1-10-09 (A) for electric.
4. Any former PIPP customer with PIPP arrears, who is income eligible for PIPP Plus but was not put on the program as of November 1, 2010, should have service reconnected for \$175 (The \$175 could be split between gas and electric.) This customer can join PIPP Plus, and the utility should place the remaining unpaid balance into the PIPP Plus program arrears, which may be eligible for recovery through a rider.
5. Graduate PIPP Plus customers should be allowed to retain or restore utility service with a payment of \$175. If the Graduate PIPP Plus customer has a default amount that is more than \$175, the remaining unpaid balance shall be placed into the PIPP Plus program arrears and the customer should begin paying his/her established Graduate PIPP Plus amount by the due date of the customer's next bill. The time period should not be extended to participate in the Graduate PIPP Plus.
6. A customer who either owes a deposit or has an outstanding balance of less than \$175 should not be considered to have utilized the Winter Reconnect Order, which is intended to allow customers who owe more than \$175, and who are disconnected or are facing disconnection, the opportunity to pay a lesser amount than what is owed.
7. A customer with multiple residential accounts who wishes to utilize the Winter Reconnect Order to maintain or reconnect service should be allowed to do so only at the property where the customer resides.

8. A customer, who has an outstanding balance and is requesting new service at a new location, should be allowed to establish new service upon payment of \$175, but should be required to enter into the best available extended payment plan consistent with Ohio Admin. Code 4901:1-18-05 for the balance. Service should be connected per Ohio Admin. Code 4901:1-13-05 (A) for gas and 4901:1-10-09 (A) for electric.
9. Utility companies should be required to inform customers of the availability of the Winter Reconnect Order by bill insert or bill message. The utilities should be allowed to supplement that bill insert/bill message with additional forms of customer communication.
10. Utility company customer service representatives should be required to inform any customer who contacts the company regarding disconnection of service or payment arrangements of all the options provided in the Winter Reconnect Order, as well as other available payment plans and sources of financial assistance the company may wish to offer to better serve its customers.
11. At the time the special reconnection procedures are invoked, a customer who is not enrolled in PIPP Plus who pays the \$175 shall be offered the best available extended payment plan consistent with Ohio Admin. Code 4901:1-18-05 or any plans approved in the company's transition plan associated with Case No. 20-591-AU-UNC and the procedures for enrollment by the next billing cycle.
12. The Winter Reconnect Order should apply to all residential customers (with the exception of customers disconnected for fraudulent practice or tampering) who owe a previous debt to the company.
13. Utility companies should be required to re-establish the service of customers disconnected for fraudulent practice or tampering provided that the customers pay for any fraudulently obtained service; any tariffed investigation fee; any defaulted amount not to exceed \$175; and a tariffed reconnect fee of no more than \$36 per utility. If the tariffed reconnect fee is more than \$36, the balance may be billed to the customer the following month.
14. The Winter Reconnect Order should be used not more than one time per customer during the effective dates of Monday, October 5, 2020 through Thursday, April 15, 2021.
15. Utility companies should be required to delay disconnection (**if the customer has not utilized the Winter Reconnect Order**) until five business days after the date of the customer's confirmed appointment with any Energy Assistance Provider (as designated by the Ohio development services agency) to administer the winter crisis program. If the utility does not receive confirmation of a winter crisis benefit at that point, the utility should be allowed to proceed with disconnection.
16. The utility companies should reconnect service as currently prescribed in Ohio Admin. Code 4901:1-18-07(A)&(B)(1) or as directed by other Commission directives related to the Emergency Order in Case No. 20-591-AU-UNC.

17. On a monthly basis, large utility companies should be required to submit the Winter Reconnect Order Metrics report to Commission Staff (with applicable data collected from Monday, October 5, 2020 through Thursday, April 15, 2021).
18. On a monthly basis, the small gas companies should be required to submit the Winter Reconnect Order report to Commission Staff (with applicable data collected from Monday, October 5, 2020 through Thursday, April 15, 2021 via an Excel template provided by the Commission).

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Case No(s). 20-1252-GE-UNC

Summary: Finding & Order setting forth special reconnection procedures that are effective no later than October 5, 2020, through April 15, 2021, for each gas, natural gas, and electric light company under the Commission's jurisdiction. electronically filed by Kelli C. King on behalf of The Public Utilities Commission of Ohio