



# Public Utilities Commission

Mike DeWine, Governor  
Sam Randazzo, Chairman

## Commissioners

M. Beth Trombold  
Lawrence K. Friedeman  
Dennis P. Deters  
Daniel R. Conway

August 13, 2020

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

RE: *In the Matter of the Application of the Ohio Edison, The Cleveland Electric Illuminating Company, and the Toledo Edison Company to Safely Resume Activities to Pre-COVID-19 Levels and Request for Waivers, Case Nos. 20-1344-EL-UNC and 20-1345-EL-WVR.*

Dear Docketing Division:

Enclosed please find a Staff letter In the Matter of the Application of the Ohio Edison, The Cleveland Electric Illuminating Company, and the Toledo Edison Company to Safely Resume Activities to Pre-COVID-19 Levels and Request for Waivers, Case Nos. 20-1344-EL-UNC and 20-1345-EL-WVR.

A handwritten signature in cursive script that reads "Barbara Bossart".

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

Enclosure

Cc: Parties of Record



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Dear Honorable Attorney Examiner:

Staff has reviewed Ohio Edison Company, Cleveland Electric Illuminating Company, and the Toledo Edison Company ("Companies") transition plan filed in this case. Staff finds most of the plan to transition back to normal operation acceptable. Staff provides the following comments on two specific issues: the requests to waive Ohio Administrative Code ("Ohio Adm.Code") 4901:1-10-09(C)(1) and Ohio Adm.Code sections 4901:1-18-06(A)(4)(a), (b), and (c).

Section (C)(1) of Ohio Adm.Code 4901:1-10-09 requires electric utilities to report unmet monthly minimum customer service levels for service installations, service upgrades, or telephonic customer service answer times for calls for any two months to the Director of the Service Monitoring and Enforcement Department. Generally, these reports include the cause of the missed customer service level as well as an action plan to bring the utility into compliance with the minimum customer service standard.

The Companies request a waiver of reporting the unmet telephonic customer service answer time for calls not to exceed 90 seconds and notifying the Director of the Service Monitoring and Enforcement Department by a written e-mail instead of providing a report. The Companies are not requesting a waiver of the entire rule.

Staff does not oppose a temporary waiver of the portion of the rule requiring notice to the Director of the Service Monitoring and Enforcement Department regarding the telephonic customer service answer times during the emergency.

Sections (A)(4)(a), (b), and (c) of Ohio Adm.Code 4901:1-18-06 require utility company employees and agents who disconnect service at the premise to complete one of the following: accept payment in lieu of disconnection, dispatch an employee to accept payment, or make



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available to the customer another means to avoid disconnection. Generally, the rule requires that the utility company make available a means to pay when the company is at the premise to disconnect.

The Companies are requesting a permanent waiver of the requirement that Company employees accept payments in the field during a disconnection.

Staff does not recommend a permanent waiver of this portion of the rule regarding the acceptance of payment in the field during a disconnection. The Companies have a limited AMI meter deployment through their territories which means the Company must still be at the premise to disconnect. Most customers expect a last opportunity to pay prior disconnections. In addition, the Company will need to make another trip to the premise to reconnect service once a customer pays by another means. Staff understands the necessity to limit face-to-face interactions, which the acceptance of payments in the field might require. However, Staff recommends that the Companies still provide the customers with an additional thirty minutes upon arrival at the premise to provide payment to avoid disconnection through one of the Companies alternative payment channels.

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

**Commission of Ohio Docketing Information System on**

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**in**

**Case No(s). 20-1344-EL-UNC, 20-1345-EL-WVR**

Summary: Staff Review and Recommendation Staff letter regarding requested waivers electronically filed by Mr. Craig E Smith on behalf of PUCO Staff