



Public Utilities Commission

Mike DeWine, Governor
Sam Randazzo, Chairman

Commissioners

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

September 15, 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 Power Company for a Waiver of Rule 4901:1-10-33(C)(13), Ohio Administrative Code, Case No. 19-1389-EL-WVR.*

Dear Docketing Division:

Enclosed please find a Staff letter in the Matter of the Application of the Ohio Power Company for a Waiver of Rule 4901:1-10-33(C)(13), Ohio Administrative Code, Case No. 19-1389-EL-WVR.

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

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:

In the September 26, 2019 Finding and Order, Staff was directed to monitor customer complaints and to file comments in the case if any emerging issues were noted. After review of customer complaints as well as Ohio Power Company's (Company) current request for waiver of Ohio Administrative Code (Ohio Adm.Code) 4901:1-10-33(C)(13), Staff is filing comments in this case to express its concerns.

Staff reviewed the Commission's call center contacts received since the approval of the temporary waiver for any issues arising from the Company's transitioning its bill printing and mailing functions to an out-of-state facility. The Commission's call center received five contacts from customers who expressed concerns regarding the timely receipt of their bills through the mail. Three customers assert receiving their bills six days from the mail date and two customers assert that they never received a bill. The Company's response to these customers was that the error was on the part of the United States Postal Service and that the customers should sign up for electronic billing. Admittedly, five contacts over an eleven-month time period does not represent a major concern to Staff. The transition from Canton, Ohio to Indianapolis, Indiana has not created serious concern as the postal delivery times are similar. In addition, the Company reported to Staff that it had received no direct customer complaints regarding mail delays over the last eleven months.

The Company's updated request for waiver of Ohio Adm.Code 4901:1-10-33(C)(13) has also been reviewed by Staff. As described in the Company's Motion, the Company will be moving its billing from Indianapolis, Indiana to Omaha, Nebraska. Staff believes the change in circumstances since the initial request for waiver of the out of state due date requirement is substantial. Thus, Staff's review of contacts for when the bills were being mailed from Indiana provides little value to determine customer concerns based on the Company's change to mailing from Nebraska. Furthermore, Staff disputes the Company's assertion that there would not be an increased delay to customers with the bills mailed from Nebraska. The United States Postal



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Service web page, <https://postalpro.usps.com/ppro-tools/service-standards-maps> demonstrates that first class mail originating from Omaha, Nebraska would take three days for delivery compared to two days from Ohio or Indiana. Staff believed that moving the billing operations to Indiana was likely not going to cause delays because expected mail times from Indiana were the same as from Ohio, therefore Staff did not oppose the waiver. However, Staff has concerns about supporting the waiver request if the company will be moving the billing operations to Nebraska where additional mail delays are expected.

In addition, the Company recently proposed a residential late charge in Case No. 20-585-EL-AIR. The lack of a residential late charge contributed to Staff's initial comfort with the temporary waiver because if customers received their bill late, they were not penalized for it. Customers are provided with additional time when the bill is mailed from out of state to ensure that the customers receiving them will have ample time to pay and avoid any late fees. Staff believes that with the possible initiation of a residential late charge, those additional days that the Rule provides for are essential because of the financial consequences to the customers. Staff believes that 21 days is a reasonable amount of time for residential customer to be allowed to pay considering the additional mailing time and the increased possibility of longer delays due to weather or staffing concerns that impact the postal service.

For the above reasons, Staff does not believe that the Company has shown good cause for a waiver of Ohio Adm.Code 4901:1-10-33(C)(13), either on a temporary or permanent basis. Furthermore, Staff recommends discontinuing the current temporary waiver of Ohio Adm.Code 4901:1-10-33(C)(13).

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Case No(s). 19-1389-EL-WVR

Summary: Comments Staff letter on waiver application electronically filed by Mr. Craig E Smith on behalf of PUCO Staff