

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 20-650-EL-AAM
Approval of Certain Accounting)
Authority.)

In the Matter of the Application of The)
Dayton Power and Light Company for) Case No. 20-651-EL-UNC
Approval of its Temporary Plan for)
Addressing the COVID-19 State of)
Emergency.)

Dayton Power and Light Company for) Case No. 20-652-EL-WVR
Waiver of Tariffs and Rules Related to)
the COVID-19 State of Emergency.)

In the Matter of the Application of the)
Dayton Power and Light Company for)
Approval of Revised Contract with) Case No. 20-755-EL-AEC
Certain Customers and Reasonable)
Arrangement Related to the COVID-19)
State of Emergency.)

**MOTION TO PROTECT PIPP CUSTOMERS DURING THE TRANSITION TO
RESUME NORMAL OPERATIONS
BY
COALITION ON HOMELESSNESS AND HOUSING IN OHIO
GREATER EDGE MONT COMMUNITY COALITION
OFFICE OF THE OHIO CONSUMERS' COUNSEL
OHIO POVERTY LAW CENTER
SOUTHEASTERN OHIO LEGAL SERVICES**

The Consumer Parties¹ move the Public Utilities Commission of Ohio (“PUCO”) for an Order to protect electric Percentage of Income Payment Plan (“PIPP”) customers during DP&L’s

¹ Ohio Poverty Law Center, Southeastern Ohio Legal Services, Greater Edgemont Community Association, Coalition on Homelessness and Housing in Ohio, Office of the Ohio Consumers’ Counsel.

transition to normal operations.² Such customers are among DP&L's most vulnerable. The coronavirus pandemic has heightened the challenges they face. They need protection. As explained in the Consumer Parties' Memorandum in Support, the PUCO should enter an Order preventing DP&L from dropping customers from electric PIPP until no earlier than January 2021. That is when the state agency responsible for administering the electric PIPP program – the Ohio Development Services Agency -- may resume dropping customers from electric PIPP for other eligibility related reasons.

Respectfully Submitted,

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Ohio Consumers' Counsel

/s/ William J. Michael
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² O.A.C. 4901-1-12.

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MEMORANDUM IN SUPPORT

I. INTRODUCTION

The coronavirus pandemic is ongoing. Ohioans continue to struggle with health and financial challenges. Electric PIPP customers need continued consumer protections due to the pandemic. To protect consumers, the PUCO should prevent DP&L from dropping customers from electric PIPP until no earlier than January 2021. That is when the state agency responsible for administering the electric PIPP program -- the Ohio Development Services Agency -- may resume dropping customers from electric PIPP.

II. RECOMMENDATION

To protect consumers, the PUCO should prevent DP&L from removing customers from electric PIPP until no earlier than January 2021.

DP&L recently filed a Notification Regarding PIPP and PIPP Graduate Programs (“Notification”).³ DP&L’s plan is to confer with state government that administers the electric PIPP program, the Ohio Developmental Services Agency, and provide notice of how it will resume the regular PIPP program at least thirty days before doing so.⁴ To protect consumers, the PUCO should prevent DP&L from dropping customers from electric PIPP until no earlier than January 2021, when the Ohio Developmental Services Agency may resume removing customers from electric PIPP.

The electric PIPP program is a vitally important consumer protection. It helps the most vulnerable Ohioans maintain their essential utility service. Recognizing the importance of this program, the PUCO prevented DP&L from dropping customers from electric PIPP as part of approving its emergency plan.⁵

The PUCO should continue the consumer protections in its Finding and Order in place, which prevent DP&L (and other electric utilities) from dropping customers from electric PIPP through the end of the year. This protection is consistent with the consumer protection provided by the Ohio Developmental Services Agency who is administering the program. Additionally, the PUCO should direct its Staff to work with the Ohio Developmental Services Agency to assist

³ August 21, 2020.

⁴ Notification at 2.

⁵ See, e.g., *In The Matter of the Application of The Dayton Power and Light Company For Approval of its Temporary Plan For Addressing the COVID-19 State of Emergency*, Case 20-651-EL-UNC, Finding and Order (May 20, 2020) at 8.

in coordinating future plans for reinstating all electric PIPP eligibility and verification requirements.

Given the critical health and safety role that electric PIPP serves in protecting at-risk Ohioans,⁶ particularly during a once-in-a-lifetime pandemic, DP&L should be prevented from prematurely dropping customers from the program.

III. CONCLUSION

The most vulnerable Ohioans' struggles have been made that much worse by the coronavirus pandemic. The PUCO should require DP&L to maintain the electric PIPP program consumer protection at least through the end of the year and consistent with the Ohio Development Services Agency's plans.

⁶ R.C. 4928.02(L).

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion To Protect PIPP Customers During The Transition To Resume Normal Operations has been served via electronic transmission upon the following parties of record this 23rd day of September 2020.

/s/ William J. Michael
William J. Michael
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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Summary: Motion Motion to Protect PIPP Customers During the Transition to Resume Normal Operations by Coalition on Homelessness and Housing in Ohio, Greater Edgemont Community Coalition, Office of The Ohio Consumers' Counsel, Ohio Poverty Law Center, Southeastern Ohio Legal Services electronically filed by Mrs. Tracy J Greene on behalf of Michael, William J.