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October 2, 2020

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SUBJECT: CASE Numbers 20-1345-EL-WVR.

Comments by the Citizens Coalition on the recent PUCO "Finding and Order" approving the Transition Plan filed by First Energy which could result in the shutoff of necessary electric service to many vulnerable customers--especially low-income families

TO PUCO and all parties and interested persons

1. We are filing the attached document containing our comments to the latest PUCO "Finding and Order" dated September 23, 2020, which generally approved the Transition Plan filed by First Energy and its companies of CEI, OE, and TE in the above referenced case. This "Finding and Order" could harm many FE customers and even result in possible deaths from unnecessary utility disconnections

2. This document is being sent to the PUCO in Columbus by email, fax, and overnight express mail.

3. We request that this be filed in the current Cases for the Transition Plan of these companies. (See Case Number 20-1345-EL-WVR.)

4. This document with comments is also being sent by email to various parties, agencies, and individuals who are interested in this Transition plan for First Energy and its companies of CEI, OE, and TE.

5. All of these steps are being taken by us to ensure adequate service for all involved in these issues.

Sincerely,


Joseph Patrick Meissner

Attorney Joseph Patrick Meissner

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Legal Counsel for Citizens Coalition

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CITIZENS COALITION

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Public Utilities Commission of Ohio (PUCO)
180 East Broad Street
Columbus, Ohio 43215

SUBJECT: CASE Numbers 20-1345-EL-WVR.

Comments by the Citizens Coalition on the recent PUCO "Finding and Order" of September 23, 2020, generally approving the Transition Plan filed by First Energy which could result in the shutoff of necessary electric service to many vulnerable customers--especially low-income families

SEE: Transition Plan and Request for Waivers of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company

CASE: In the Matter of the Application of Ohio Edison, the Cleveland Electric Illuminating Company, and the Toledo Edison Company To Safely Resume Activities to Pre-COVID 19 Levels and Requests for Waivers

Case Numbers 20-1344-EL-UNC and 20-1345-EL-WVR

Dear people,

We are filing this letter of comments in response to the recent PUCO "Finding and Order," of September 23, 2020, generally approving the Transition Plan filed by First Energy which could result in the shutoff of necessary electric service to many vulnerable customers--especially low-income families

1. PROCEDURE: We are filing this as a letter because of various problems for our staff and operations caused by the COVID-19 PANDEMIC Virus crisis. We understand it would be best to file a Motion to Intervene and follow all the applicable rules. Because of the various problems, as well as the ongoing virus dangers and the need for haste, we request that the Commission expeditiously consider this letter of Comments. We are ready to answer any questions and recommendations from the PUCO Staff and all others involved in these proceedings.

2. THANK-YOU. We know how much time, effort, and work from all including the PUCO, PUCO Staff, and all personnel from all companies as well as customers and customer advocacy groups have been devoted to the current utility situation including the problems from the Corona Virus pandemic as well as all the economic problems. We do thank all. We especially commend the personnel from First Energy and its companies for their efforts including reaching out to us, the community groups, and customers.

3. GOALS. During this crisis including resumption of FE's disconnection activities, we do stress the following goals:

a. Nobody, including the electric companies and the customer advocates, wants to disconnect any vulnerable customer. The goal should be no disconnections. Everyone should take all reasonable efforts to keep all customers connected to necessary electric utility service.

b. No economic harm should be suffered by the First Energy companies. All customers need electric service but there is an obligation to pay for such service including under the provisions of The Percentage of Income Payment Plan (PIPP), and under any monthly payment plan.

4. THE COVID-19 VIRUS PANDEMIC AND SHUTOFF MORATORIUM. There is no need to review this crisis nor the fact that it seems like this Corona pandemic will continue for some time, perhaps for several years. While the PUCO "Finding and Order" refers to the COVID-19 situation, the Citizens Coalition is concerned that the PUCO may not be considering and taking the full situation into account in its decision. This shutoff moratorium originally ordered by the PUCO was the result of the pandemic. Has this crisis ended? If it has not, how can the Commission dissolve the moratorium? Every consumer advocacy groups including the Ohio Consumer Counsel has urged that the moratorium should be continued as long as the emergency still remains. (See Paragraph 7, PUCO "Finding and Order," with its language justifying all utility company activities "for the duration of the emergency.") This only makes sense. But by the terms of this "Finding and Order," it is as though the PUCO is saying "We hope the crisis is abated, so we will stop prescribing the medicine."

THEREFORE, THE CITIZENS COALITION URGES THE PUCO TO RECONSIDER DISSOLVING THE MORATORIUM AND REIMPOSE THE MORATORIUM AT THIS TIME UNTIL THE CORONA VIRUS EMERGENCY ENDS.

5. SHUTTING OFF ELECTRIC SERVICE AND ENDANGERING ALL OF US. If a family's electric service is disconnected by a utility company, this endangers the health and life of all of us. When a household has no electricity, especially as the weather gets colder in the Fall, what could happen? Families could lose their food supply in their darkened refrigerators and freezers. They could lose needed electricity for various medical machines. They would not have lighting for stairs, hallways, and even porches, garages, and backyards. Would the families have to leave their homes in order to find food? Would elderly people suffer from falls and accidents? Would children be left without heat because the furnaces do not operate properly without electricity? Would we find family members wandering outside the social safety of their homes, looking for shelter, and trying to find food and liquids? Would we encounter such people

on the street or in stores, possibly spreading the virus? The Citizens Coalition is positive that all of us would rather have such utility customers stay in their homes, maintaining social distancing, and making reasonable payment arrangements on their electricity bills.

THE PUCO MUST AMEND ITS ORDER AND FINDING TO ENSURE THAT EVERY AID PROGRAM AND SERVICE AGENCY, INCLUDING PAYMENT OPTIONS AND PLANS, ARE AVAILABLE TO HELP ALL ELECTRIC UTILITY CUSTOMERS.

6. THE PUCO SHOULD ENACT A TWO-DAY HOME VISIT REQUIREMENT BEFORE ANY DISCONNECTION OF ANY ELECTRIC CUSTOMER

We recommended this idea in our initial Citizens Coalition comments to FE's transition plan. Here are possible scenarios.

a. Company personnel come to the customer's home. Customer comes out and makes payment. (Cash, credit card, and check.) Service remains on and no disconnection.

b. Company personnel come to home. Customer is home but does not have payment. Company personnel leave "Emergency Notice of shutoff in two days" which warns that company personnel will return in two days if no payment arrangement is accomplished. Customer has two days to make payment arrangement, such as going to an agency or finding the money somewhere. If this is done, company personnel do not have to return to home and no shutoff is needed. Let's assume no arrangement is made. Company personnel return to home in two days. If customer is there, family can pay the bill. If no payment, disconnection is done.

c. Company personnel come to home. Nobody is home. Company personnel leave "Emergency Notice of shutoff in two days" which warns that company personnel will return in two days if no payment arrangement is accomplished. Customer has two days to make payment arrangement. If this is done, company personnel do not have to return to home and no shutoff is needed.

d. Company personnel come to home. Nobody is home. Company personnel leave "Emergency Notice of shutoff in two days." Customer has two days to make payment arrangement. Let's assume no arrangement is made. Company personnel return to home in two days. If customer is there, family can pay the bill. If no payment, disconnection is done.

We assume that the company personnel will have the information, including written, on the various alternatives, agencies, programs, and payment arrangements when they come to the home on what is available for the customer to avoid disconnection and satisfy their bill. We understand that this could increase the work for First Energy companies, but it can also decrease their work to the extent that a customer pays the bill or makes arrangements to pay the bill. Company personnel will not have to return to reinstate service, having disconnected it.

This two-day procedure should decrease disconnections, thus reducing hardship on the customer and the company.

We recognize that this may increase company costs and we would not oppose their efforts at recovering these.

Why do all of this? Because of the extraordinary and unprecedented virus crisis as well as the fact that disconnections can harm the customer, company personnel, and others in the public.

There are some other reasons for adopting this policy. We do not wish to appear paranoid. But people seem "crazy" these days. Look at their car driving with extreme speeds and noise and much commotion. Look at what some people have done in terms of road rage. Consider fights and other bizarre behavior. Frankly, imagine if someone is under heavy stress and experiencing unemployment and money problems. For someone not to pay their electric bill for such a necessity as electric service, there must be something seriously wrong in the household. We should not aggravate that and promote some kind of perilous reaction.

THEREFORE, THE PUCO MUST AMEND ITS "FINDING AND ORDER" TO REQUIRE THIS TWO-DAY DISCONNECTION PROCEDURE IN ORDER TO ENSURE THAT CUSTOMERS ARE NOT NEEDLESSLY DISCONNECTED, THAT FAMILIES ESPECIALLY LOW-INCOME HAVE ACCESS TO VITAL ELECTRIC SERVICE, THAT COMPANY PERSONNEL ARE SAFEGUARDED, THAT THE COMPANIES ARE BETTER ABLE TO COLLECT MONEYS OWED TO THEM, AND THAT THE PUBLIC IS PROTECTED.

7. ENSURING THE CUSTOMERS AND PUBLIC ARE ADEQUATELY INFORMED ABOUT THE RESUMPTION OF UPCOMING UTILITY COMPANY DISCONNECTION ACTIVITIES

On page 4, Paragraph 16, in PUCO "Finding and Order," the Commission refers to FE's efforts "via its website, bill messages, and interactive voice response system" to inform the public and its customers about disconnections and new reconnection requirements. (See also Paragraph 17.)

While these FE efforts are commendable, the Citizens Coalition requests of the PUCO and its Commissioners what has the PUCO done State-wide to inform everyone? What contacts has the PUCO made with various news media, including print, radio, and television? Such communication from the agency in charge of all Ohio public utilities not only seems advisable, but even required from the PUCO. The Commission has the authority and indeed a responsibility to provide standardized Ohio-wide information and instructions, especially concerning shutoff procedures.

THEREFORE, IN THIS "FINDING AND ORDER" THE COMMISSION MUST AMEND THIS AND DECLARE ALL THE STEPS THE COMMISSION WILL TAKE TO INFORM THE PUBLIC IN COORDINATION WITH PUBLIC INFORMATION ACTIVITIES OF FE AND THE UTILITY COMPANIES ABOUT UPCOMING CHANGES IN DISCONNECTION PROCEDURES.

8. CITIZENS COALITION URGES PUCO TO CLARIFY ITS "FINDING AND ORDER" CONCERNING RECONNECTION CHARGES, LATE PAYMENT FEES, AND SECURITY DEPOSITS.

In Paragraph 26 on page 8 of its "Finding and Order," the PUCO seems to allow the FE companies to reinstate their reconnection fees and security deposits as well as late payment fees and other charges. We oppose any imposition of these items, especially on low-income families. It is highly unlikely that customers, including low-income families have willingly and voluntarily made a decision not to pay these. Such extra payments may simply add financial

millstones to already over-stressed customers and could even place insurmountable obstacles in the way of customers receiving and maintaining electric service.

The Commission itself in Paragraph 25, on page 7, of its "Finding and Order" seems to acknowledge this: "the Commission recognizes that many customers may continue to experience financial stress as a result of COVID-19, despite the gradual reopening of businesses throughout Ohio." The Citizens Coalition has strongly recommended that all of these extra charges be waived at the present time by the companies.

The PUCO has ordered that the companies be able to impose these as part of its Transition Plan. It is not clear, however, whether customers--especially low-income families--will actually have to pay these extra charges now to continue or gain necessary service or if these will be added onto any balances they may owe and thus payable in the future. We most compellingly recommend that if the companies do demand such extra charges, that the companies forego immediate collection of such extra charges, but simply add these into balances owed by the customers.

THEREFORE, IN THIS "FINDING AND ORDER" THE COMMISSION MUST AMEND THIS AND DECLARE THAT WHILE THE COMPANIES CAN IMPOSE SUCH EXTRA CHARGES, THEY SHALL FOREGO ACTUAL COLLECTION OF THESE AT PRESENT, BUT SIMPLY ADD THESE TO THE CUSTOMER BALANCES TO BE PAID IN THE FUTURE.

9. CITIZENS COALITION URGES PUCO TO CLARIFY ITS "FINDING AND ORDER" CONCERNING READING OF INDOOR METERS.

The Citizens Coalition is not quite clear about the PUCO's order regarding indoor metering. See Paragraph 21 on page 6; Paragraph 24 on page 7; and Paragraph 25 on Page 8; of the "Finding and Order."

In its initial comments the Citizens Coalition in Paragraph 8 discussed any necessity for reading of indoor meters and suggestions on how this could be done safely. These took into account the requirement for social distancing and safe practices. Here is a slightly revised version of that discussion:

On pages 9 and 10 of the Transition Plan, the company spells out the steps it will take to safeguard customers if in-person readings may be needed on indoor meters. We would make two suggestions on how this can be done while keeping social contacts to a minimum.

First, the company personnel could provide customers with a paper form on which a customer could draw the readings of the circles on the meter face. These can be compared to past meter readings for that location which should spot any efforts at providing phony or incorrect results.

Secondly, many customers including many low-income families have access to cell phones which can take photographs. A customer could simply take a photograph of the meter with its readings and then show or send this to a customer representative who never has to enter the premises. Again, there would be past meter readings which could provide for reconciliation and provide a check upon any supplying of fake or incorrect numbers.

The Commission has not explicitly recommended that the Companies adopt these two suggestions recommended by the Citizens Coalition.

THEREFORE, IN THIS "FINDING AND ORDER" THE COMMISSION MUST ADD ITS ENDORSEMENT THAT THE COMPANIES SHOULD ADOPT THE CITIZENS COALITION TWO SUGGESTIONS WHICH SHOULD PROVIDE MORE SAFETY FOR IN-DOOR METER READINGS.

10. Conclusion.

We thank the PUCO for this opportunity to offer these Comments related to its "Finding and Order" dated September 23, 2020. We do hope these are helpful to the Commission, its staff, to the Companies, and to all the customers.

Let us say again as we did in our initial comments on the FirstEnergy Transition Plan: We repeat over and over at public meetings and on zoom presentations, that the companies really do not want to disconnect any customer. We also emphasize that any Company must be paid for all the electricity it supplies, including for customers enrolled in PIPP or on various monthly payment plans. We furthermore urge everyone to spread these two messages.

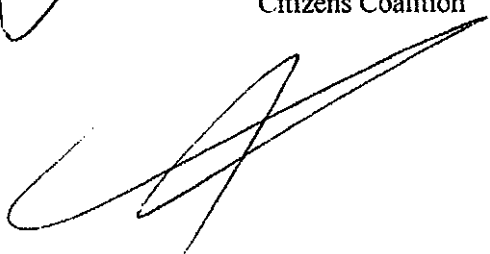
During this time of a pandemic when health and lives can be at stake, we urge every electric company to take the approach that "no customer shall be left behind."

The members involved in the Citizens Coalition have and will work diligently so that as far as possible no customer will be disconnected. We are positive that the Company will also adopt this humane, life protecting, and moral guideline.

Respectfully submitted,


Joseph Patrick Meissner

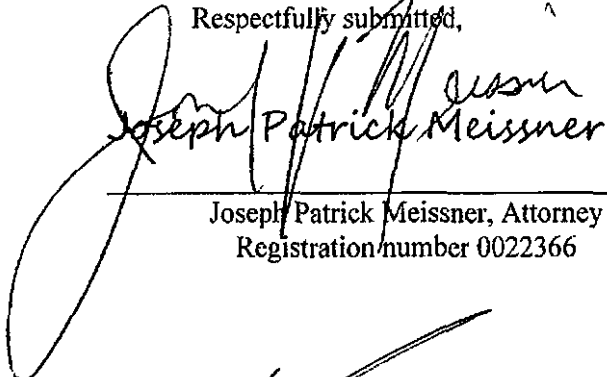
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Legal Counsel for the
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SERVICE

We are providing copies of this Letter of Comments to all parties and other expressing their interest in these proceedings, to the PUCO and its Commissioners, to FirstEnergy and its personnel, and to the public. We request that this be accepted in the docket of this Proceeding. We are available to discuss this at any time with anyone.

Respectfully submitted,



Joseph Patrick Meissner

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