

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company to Safely Resume Activities to Pre-COVID-19 Levels and Requests for Waivers)	Case No. 20-1344-EL-UNC
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)	Case No. 20-1345-EL-WVR
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APPLICATION OF OHIO EDISON COMPANY, THE CLEVELAND ELECTRIC ILLUMINATING COMPANY, AND THE TOLEDO EDISON COMPANY TO RESUME RESIDENTIAL INDOOR METER READING

I. INTRODUCTION

In response to the COVID-19 pandemic and in compliance with orders of this Commission, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the “Companies”) suspended indoor meter reading for residential customers where the meter is located inside the customer’s residence. Now, for the reasons set forth herein, the Companies respectfully request Commission approval to resume reading meters for residential customers whose meters are located inside their residences.

II. DISCUSSION

On March 20, 2020, the Commission issued an Entry directing all public utilities to suspend in-person, actual meter readings in circumstances where a meter is located inside a customer’s home or similar location.¹ That Entry also directed all public utilities to suspend all other non-essential functions that may create unnecessary COVID-19 risks associated with social contact, for the duration of the emergency.² In compliance with the Entry, the Companies suspended in-

¹ Entry, Case No. 20-591-AU-UNC (“Emergency Case”) (Mar. 20, 2020) at ¶¶ 9-11.

² *Id.*

home meter readings, as well as all other non-essential functions that could create unnecessary COVID-19 risks associated with social contact.³ In addition, and in compliance with directives from Governor DeWine, the Ohio Department of Health, and the Commission, the Companies implemented a number of additional measures to help customers and employees weather the state of emergency that resulted from the COVID-19 pandemic.⁴

Subsequently, the Commission instructed utilities to submit plans describing their expectations for safely resuming activities to a pre-COVID-19 basis, “including operations that will necessarily involve at least the potential for an expanded level of social contact.”⁵ The plans were to address “the resumption of activities and operations previously prohibited by the *Emergency Case* in furtherance of a safe return to pre-COVID-19 operations.”⁶ In their plans, utilities were to discuss activities considered for resumption (*e.g.*, meter reading and service disconnections) and include timelines and provisions for safety adaptations for residential and non-residential customers, among other things.⁷

On July 31, 2020, the Companies filed their Transition Plan in these dockets, explaining how they proposed to resume normal business operations while continuing to implement protections for the health and safety of employees, customers, and the public. Among other things, the Companies requested permission to resume actual reading of indoor meters. On September 23, 2020, the Commission issued its Finding and Order approving the Companies’ Transition Plan, except that the Commission did not approve the Companies’ request to read indoor meters where

³ Transition Plan and Request for Waivers of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (“Transition Plan”) (Jul. 31, 2020) at p. 2.

⁴ *See generally*, Transition Plan.

⁵ *See, e.g.*, Finding and Order, *In the Matter of the Application of Duke Energy Ohio*, Case Nos. 20-599-GE-UNC, *et al.* (June 17, 2020) (“Duke Order”) at ¶ 24.

⁶ *Id.*

⁷ Duke Order at ¶ 25. *See also*, Finding and Order, *In the Matter of the Application of The Dayton Power and Light Company*, Case Nos. 20-650-EL-AAM, *et al.* (May 20, 2020) at ¶¶ 25, 50.

those meters are located inside a customer's residence.⁸ Further, the Commission "stress[ed] the need for the Companies' consistent commitment . . . to observe social distancing guidelines, as well as other precautionary measures."⁹ Pursuant to the Commission's Finding and Order, the Companies did not resume – and have not resumed – indoor meter reading for residential customers where the meter is located inside the customer's residence.

The Companies intend to resume all indoor meter reading and request Commission approval to read indoor meters for residential customers whose meters are inside their residences. In all situations where in-person contact is possible, the Companies will follow the guidance of health authorities and this Commission and implement COVID-19 precautions, including social distancing and the use of Personal Protective Equipment (PPE). Before entering a customer's residence, meter readers will inquire of customers to determine if the customer knows or suspects that he or she, or any member the household, has or may have COVID-19. If the customer answers "yes" to the questions or if the customer denies access due to COVID-19-related concerns, the Companies will not complete the indoor meter read for that customer at that time.

Allowing the Companies to resume all indoor meter reading will benefit customers by providing them with actual meter reads, thus reflecting their actual usage for billing purposes. Resuming indoor reads will also allow the Companies to true-up prior estimated meter reads and verify meter reads that have been provided by customers during the COVID-19 pandemic. The Companies' request to resume all indoor meter reading is also consistent with the announcement from Governor DeWine that he has lifted all of Ohio's COVID-19-related health orders effective June 2, 2021. The Companies will monitor developments and governmental directives and will

⁸ Finding and Order (9/23/2020) at ¶ 25 ("For these reasons, we approve FirstEnergy's transition plan, **except in regard to the Companies' request to resume meter readings where the meter is located inside a customer's residence.**") (emphasis added).

⁹ *Id.*

consult with Staff as needed to adjust or modify their resumption of indoor meter reading to ensure the safety of employees, customers and the public.

III. CONCLUSION

For the foregoing reasons, the Companies respectfully request that Commission allow them to resume reading meters for residential customers whose meters are located inside their residences.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Application of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company to Resume Residential Indoor Meter Reading was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 9th day of June 2021. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/Christine E. Watchorn
*An Attorney for Ohio Edison Company, The
Cleveland Electric Illuminating Company, and The
Toledo Edison Company*

This foregoing document was electronically filed with the Public Utilities

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

Summary: Application to Resume Residential Indoor Meter Reading electronically filed by Ms. Christine E. Watchorn on behalf of Ohio Edison Company and The Cleveland Electric Illuminating Company and The Toledo Edison Company