

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Duke)
Energy Ohio, Inc., for a Waiver of Specific) Case No. 22-0043-GE-WVR
Sections of the Ohio Administrative Code.)

**PUBLIC INFORMATIONAL FILING REGARDING
RESUMPTION OF DISCONNECTIONS FOR NON-PAYMENT OF
DUKE ENERGY OHIO, INC.**

I. INTRODUCTION

Comes now Duke Energy Ohio, Inc. (Duke Energy Ohio or Company), pursuant to the directives of the Public Utilities Commission of Ohio (Commission) in its March 23, 2022, Finding and Order (March 23 Order) in the above-styled proceeding (Waiver Case), and hereby files this Public Informational Filing to describe how the Company will resume disconnections for non-payment, notices of disconnection, and late payment charges, previously suspended in order to allow for system stability during the replacement of the Company's legacy customer information system (CIS) with its new CIS, Customer Connect.

II. BACKGROUND

On January 19, 2022, the Company filed its Application in this case, seeking temporary waivers of a number of regulations and tariff provisions in order to be able to complete its transition to the new CIS. A number of processes were suspended or altered for various periods, as detailed in the March 23 Order approving the Application, subject to certain conditions.¹ Among other things, the Company stated that it would need to (1) suspend disconnections for non-payment (DNPs) from March 1 until July 1, 2022; (2) suspend DNP notices, delinquency processes, and

¹ March 23 Order, pp. 5, 24-28.

collections campaigns from March 31 until June 1, 2022; and (3) suspend assessing late payment charges from March 31 to July 1, 2022 (collectively, Suspended Collections Processes). The Company requested a waiver for the third item.²

After interest was expressed in knowing more about how the Company would communicate with customers regarding the resumption of the Suspended Collections Processes, the Company stated in its reply comments that it would be willing to make an informational filing:

The Company is not opposed to making a public informational filing in this proceeding to describe its plan to transition to the resumption of DNPs, which would include the following items:

- Planned dates for the resumption of late payment charges, disconnection notices, and disconnections;
- A bullet-point outline of its communications plan with customers;
- Plans pertaining to enrollment of customers in payment plans and/or PIPP Plus prior to the resumption of DNPs; and
- Steps to be taken to collaborate with agencies to facilitate the flow of aid to qualified customers and thereby help minimize the number of customers facing DNP.

Additionally, the Company would be willing to update its informational filing if the planned dates changed.³

In the March 23 Order, the Commission approved the Company's plan regarding the above matters, as clarified by the Company's comments, and directed the Company to "make a public informational filing in this proceeding, in conformance with the filing described in Duke's reply comments, to describe its plan to resume DNPs."⁴ Accordingly, the Company submits the below plan for the resumption of the Suspended Collections Processes.

² See Application, pp. 5-6. As the Company noted in its Application, the suspension of DNPs and collections did not require a waiver.

³ Reply Comments of Duke Energy Ohio, Inc., pg. 5 (March 4, 2022) (Duke Reply Comments).

⁴ March 23 Order, pg. 24.

III. PLAN FOR THE RESUMPTION OF DNPS, DNP NOTICES, COLLECTIONS, AND LATE PAYMENT CHARGES.

A. Planned Dates For Resumption Of Suspended Collections Processes.

The Company plans to resume the Suspended Collections Processes according to the following schedule.

Disconnection Notices on Customer Bills: the Company plans to resume issuing initial disconnection notices on customer bills as of June 20, 2022. This is later than the June 1 date originally given in the Application,⁵ but the Company believes that waiting to resume disconnect notices until June 20, 2022 is necessary to ensure that the disconnection date contained on the residential disconnect notices will not be any earlier than July 1, 2022. The initial disconnection notices that appear on a residential customer bill state a disconnection date that is 14 days after the date of the notice and, if the Company began issuing such notices on June 1, the disconnection dates of June 15 would prematurely alarm and confuse residential customers. Thus, the Company will resume disconnection notices for both residential and non-residential customers on the bill as of June 20, 2022.

Disconnections For Non-Payment: formally, the Company plans to resume disconnections for non-payment, beginning on July 1. Practically speaking, due to the multiple stages of notification⁶ that the Company is required to complete before actually performing a disconnection, the Company anticipates that residential disconnections will begin to actually occur

⁵ Application, pg. 6 (January 19, 2022).

⁶ For example, for residential customers, the Company is required to provide a 14-day notice on the monthly bill, a 10-day final notice, a 2-business day notice, and a day of disconnection notice. See O.A.C. 4901:1-18-06(A) (14-day notice); *In the Matter of the Application of Duke Energy Ohio, Inc. for a Waiver of Ohio Adm.Code 4901:1-10-18-06(A)(2)*, Case No. 19-187-EL-WVR, Finding and Order, pp. 2-3 (September 26, 2019) (describing additional notification steps approved for Duke Energy Ohio).

on or after approximately July 11, 2022, for non-residential customers, and approximately July 17, 2022, for residential customers.

Late Payment Charges: late payment charges will begin to be assessed on July 1, 2022.

B. Outline Of Communications Plan With Customers.

The Company will communicate with customers regarding the resumption of disconnections via bill message and also via the multiple stages of disconnection notices.

On their June bills, customers will see the following message, which has been reviewed and approved by Staff:

Late payment charges and disconnections for non-payment are scheduled to resume in July. Please contact us at the number above or visit our website to learn more about our Budget Billing program and available payment plan options.

Additionally, customers will receive disconnection notices prior to any disconnect occurring. For residential customers, the notices will occur as follows:

1. A 14-day disconnect notice on the monthly bill. The bill will contain the Company's disconnect notice, which will provide helpful information to the customer, including but not limited to information regarding PIPP Plus, payment plan options, medical certification, energy assistance, as well as contact information for both the Company's credit department, the Commission, and the Ohio Consumers' Counsel.⁷
2. A 10-day disconnect notice. The Company first attempts to provide this notification via an automated phone call. If the call attempt is unsuccessful, the notice is mailed the next business day.

⁷ A complete sample copy of the Company's residential disconnect bill with the notice language can be viewed at *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of Bill Format Changes*, Case No. 21-1233-GE-UNC, Correspondence, Revised Bill Formats, pp. 36-41 (March 15, 2022).

3. Text messages and automated calls attempted to the customer two business days prior to disconnection.
4. A day-of-disconnect notice. The Company will attempt to call and text message the customer. If the disconnection can be performed remotely, it will be performed after the call and text attempts. If the disconnection must be performed on the premises, then personal contact will be attempted and an additional paper notice will be left if the personal contact attempt is unsuccessful.

Non-residential customers will receive notices in accordance with O.A.C. 4901:1-10-17.

C. Plans Pertaining To Enrollment Of Customers In Extended Payment Plans Or PIPP Plus Prior To Resumption Of Disconnections For Nonpayment.

The Company has, at this point, completed the processing of all OCEAN files which had been delayed or suspended by the conversion to the new CIS. Apart from the PIPP Plus program, customers who wish to enroll in extended payment plans have self-service options available via both the IVR and the Company's website.

Given that the Company has caught up on the processing of formerly outstanding OCEAN files and that non-PIPP Plus customers have access to enroll themselves in extended payment plans, the Company believes its normal business practices should be adequate going forward for informing customers who are at risk of being impacted by the resumption of the Suspended Collections Practices of the availability of PIPP Plus and also of extended payment plans. As discussed in the Company's sur-reply comments,⁸ this brief, not-actively-publicized, suspension of the Suspended Collections Processes is very different from the longer, very publicly prominent, suspension of disconnections for nonpayment which occurred during the COVID pandemic.

⁸ Proposed Surreply Comments of Duke Energy Ohio, Inc., pp. 2-3 (March 22, 2022).

Among other things, the total amount of arrearages accumulated is expected to be much lower. The disconnect notices that customers will receive in the ordinary course of business will provide information regarding both PIPP Plus and extended payment plans, as well as contact information for the Company that the customer can use to take steps to enroll.

D. Plan To Collaborate With Agencies To Facilitate The Flow Of Aid To Qualified Customers And Thereby Help Minimize The Number Of Customers Facing DNP.

The Company has already begun and will continue collaborating with agencies to facilitate the flow of available aid to qualified customers.

First, in its most recent Quarterly Collaborative Meeting with agencies on May 12, 2022, the Company provided an update to agencies regarding its plans and timing for the resumption of the Suspended Collections Processes and emailed the Community Action Agencies to provide this information. The Company will follow these efforts with an email reminder to its agency distribution list in June.

Second, the Company will personally call each Community Action Agency director to make them aware of the dates that customers will begin to receive disconnection notices and the associated DNP dates.

Third, summer crisis funds will become available on July 1, 2022, so that residential customers will have that additional funding available to them at the time disconnections for nonpayment resume.

As always, the Company will work collaboratively with agencies for the benefit of its customers.

IV. CONCLUSION

Pursuant to the March 23 Order, Duke Energy Ohio respectfully submits this public informational filing.

Respectfully submitted,

/s/ Larisa M. Vaysman

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CERTIFICATE OF SERVICE

I certify that the Informational Filing of Duke Energy Ohio, Inc., was served by First-Class U.S. Mail or electronic delivery upon counsel identified below for all parties of record this 1st day of June, 2022.

/s/ Larisa M. Vaysman
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Summary: Notification Public Informational Filing Regarding Resumption of
Disconnecting For Non-Payment of Duke Energy Ohio, Inc. electronically filed by
Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco
and Kingery, Jeanne W. and Vaysman, Larisa