

OCC EXHIBIT NO. _____

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)
Power Company for Authority to) Case No. 23-23-EL-SSO
Establish a Standard Service Offer)
Pursuant to R.C. 4928.143 in the Form of)
an Electric Security Plan.)

In the Matter of the Application of Ohio) Case No. 23-24-EL-AAM
Power Company for Approval of Certain)
Accounting Authority.)

**TESTIMONY RECOMMENDING MODIFICATION OF THE STIPULATION
OF
ANDREW R. TINKHAM**

**On Behalf of
Office of the Ohio Consumers' Counsel**
*65 East State Street, Suite 700
Columbus, Ohio 43215*

September 20, 2023

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1 **I. INTRODUCTION**

2

3 ***Q1. PLEASE STATE YOUR NAME, ADDRESS AND POSITION.***

4 ***A1.*** My name is Andrew R. Tinkham. My business address is 65 East State Street,
5 Suite 700, Columbus, Ohio 43215. I am a Utility Consumer Program Specialist
6 with the Office of the Ohio Consumers' Counsel ("OCC").

7

8 ***Q2. PLEASE BRIEFLY SUMMARIZE YOUR EDUCATION AND***
9 ***PROFESSIONAL EXPERIENCE.***

10

11 ***A2.*** I am a 1996 graduate of Otterbein College, in Westerville, Ohio, with a Bachelor
12 of Arts degree in History. My professional experience includes 6 years in the
13 telecom industry and 18 years of utility regulatory experience with the OCC.

14

15 Initially, I served as a compliance investigator with the OCC and my duties
16 included researching and resolving consumers' inquiries and complaints that
17 involved Ohio regulated utilities through the consumer hotline. Later, I served as a
18 senior outreach and education specialist. My role included providing public
19 presentations on utility assistance programs, energy choice, and consumers' rights
20 along with educating local agencies and organizations on utility rules. Most
21 recently, I was promoted to a Utility Consumer Program Specialist.

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1 **Q3. WHAT ARE YOUR RESPONSIBILITIES AS A UTILITY CONSUMER**
2 **PROGRAM SPECIALIST?**

3
4 **A3.** As a Utility Consumer Program Specialist, I provide policy recommendations in
5 cases and various rulemaking proceedings at the Public Utilities Commission of
6 Ohio ("PUCO") and the Ohio Department of Development. Those policy issues
7 involve advocacy for better consumer protections, affordability of utility rates,
8 and reasonable access to essential utility service for residential consumers.
9

10 **Q4. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY BEFORE THE**
11 **PUCO?**

12
13 **A4.** Yes. I filed testimony in Case Nos. 22-179-GA-ATA, 22-1094-WW-AIR, and 23-
14 23-EL-SSO.
15

16 **II. PURPOSE OF TESTIMONY**
17

18 **Q5. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**
19 **PROCEEDING?**

20
21 **A5.** The purpose of my testimony is to explain and support OCC's position and
22 recommendations that AEP Ohio's Electric Security Plan Joint Stipulation and
23 Recommendation ("Settlement") not be adopted. The Settlement does not
24 consider affordability, especially to at-risk consumers and thus is not in the public
25 interest, failing to meet the PUCO's three prong test. The settlement also violates
26 regulatory principles and practices.

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1 In the Settlement, AEP Ohio, PUCO Staff, and other parties agreed to the terms of
2 AEP Ohio's Electric Security Plan V ("ESP") as filed on September 6, 2023. As
3 part of my analysis, I reviewed the Settlement under the PUCO's three prong test
4 for evaluating settlements.

5

6 **Q6. PLEASE SUMMARIZE YOUR RECOMMENDATIONS REGARDING THE**
7 **SETTLEMENT.**

8

9 **A6.** I recommend the PUCO reject the Settlement signed between AEP Ohio, PUCO
10 Staff, and other parties due to violating prongs two and three of the test that the
11 PUCO uses to evaluate settlements.

12

13 The Settlement, if approved, goes against the public interest and regulatory
14 principles by not addressing a reduction in service disconnections for non-
15 payment. According to AEP Ohio's Report of Service Disconnections for
16 Nonpayment, the company disconnected 155,398 residential consumers from June
17 1, 2022, through May 31, 2023.¹ In AEP Ohio's 2022 Report of Service
18 Disconnections for Non-payment, the company disconnected 163,749.² The
19 PUCO should require AEP Ohio to reduce residential disconnections annually by
20 15% throughout the service territory. In addition, within the 15% reduction
21 throughout the service territory, AEP Ohio should reduce service disconnections

¹ 23-532-GE-UNC, Annual Report of Service Disconnections for Non-Payment of Ohio Power Company (June 30, 2023).

² 22-513-GE-UNC, Annual Report of Service Disconnections for Non-Payment of Ohio Power Company (June 30, 2022).

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1 by 15% in the in the top twenty zip codes with the highest number of
2 disconnections on an annual basis.

3
4 The Settlement, if approved, goes against the public interest and regulatory
5 principles by not providing consumer protections, especially to at-risk consumers.
6 In the Settlement, AEP Ohio would provide \$400,000 annually to the Neighbor-
7 to-Neighbor bill payment assistance program funded through the Energy
8 Efficiency Rider. It is beneficial to consumers that the Settlement provides bill
9 payment assistance to at-risk consumers, but the \$400,000 should be funded by
10 shareholders, **not** by utility consumers.

11
12 The Settlement, if approved, goes against the public interest and regulatory
13 principles by not providing consumer protections, especially to at-risk consumers.
14 The Settlement continues the collection of the Automaker Credit Rider (Not
15 exceed \$500,000 per year for all customers combined) from residential
16 consumers. Residential consumers should not subsidize the auto industry through
17 utility rates.

18
19 Further, the Settlement, if approved, goes against the public interest by only
20 providing annual zip code disconnection data to the PUCO, but not to the OCC or
21 the public. The PUCO should require AEP Ohio to publicly report service
22 disconnections by zip code on a quarterly basis.

Finally, the Settlement, if approved, goes against the public interest and regulatory principles by not requiring the Percentage of Income Payment Plan (PIPP) generation rate be at or below the Standard Service Offer (SSO) rate. A PIPP generation rate that is higher than the SSO causes PIPP consumers to accrue higher arrearages. Also, a PIPP generation rate that exceeds the SSO causes AEP Ohio utility consumers (including PIPP consumers) to pay a higher Universal Service Fund (USF) to cover the higher PIPP generation rate.

III. DISCUSSION OF CRITERIA

Q7. WHAT ARE THE CRITERIA THE PUCO RELIES UPON WHEN CONSIDERING WHETHER TO ADOPT A SETTLEMENT?

A7. The PUCO will adopt a settlement only if it meets all of the three criteria delineated below. The PUCO considers the following: 1. Is the settlement a product of serious bargaining among capable, knowledgeable parties? 2. Does the settlement, as a package, benefit customers and the public interest? 3. Does the settlement violate any important regulatory principles or practices?³ In addition, to these three criteria, the PUCO at times considers whether the parties to the settlement represent diverse interests.

³ *Consumers' Counsel v. Pub. Util. Comm'n.* (1992), 64 Ohio St.3d 123, 126.

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1 **Q8. DOES THE SETTLEMENT FILED IN THIS PROCEEDING MEET THE**
2 **CRITERIA THE PUCO RELIES UPON WHEN CONSIDERING WHETHER**
3 **TO ADOPT A SETTLEMENT?**
4

5 **A8.** No. As I further explain below, the Settlement does not satisfy the second or third
6 prongs of the three-part settlement test. The Settlement does not benefit customers
7 and the public interest. The Settlement also is contrary to regulatory principles
8 and practices violating prong three of the settlement test.
9

10 **Q9. PLEASE EXPLAIN HOW THE PROPOSED SETTLEMENT DOES NOT**
11 **BENEFIT CUSTOMERS AND THE PUBLIC INTEREST IN TERMS OF**
12 **AFFORDABILITY AND SERVICE DISCONNECTIONS.**
13

14 **A9.** The settlement parties do not address affordability or the large number of AEP
15 service disconnections that occurred in previous years. Also, the Settlement only
16 provides annual disconnection data by zip code to the PUCO. And the Settlement
17 does not adopt measures that could lower service disconnections. If the PUCO
18 approves the Settlement, there is a greater chance the service will become less
19 affordable resulting in an increase in service disconnections.
20

21 First, when you compare AEP Ohio's 2022 to 2023 annual disconnection reports,
22 you can see that electric service is becoming less affordable for consumers. The
23 total dollar amount of unpaid bills represented by such disconnections tripled
24 from \$21,162,801⁴ to \$63,554,235.65⁵, which results in an increase of
25 \$42,391,434.65. Also, the number of final notices increased from the 2022 to the

⁴ *Id.*

⁵ *Id.*

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1 2023 filing from 1,673,835⁶ to 1,789,128⁷, an increase of 115,293 final notices
2 sent to residential consumers. Finally, the total amount of unpaid balances on the
3 final disconnection notices increased from the 2022 to the 2023 filing from
4 \$459,550,106⁸ to \$542,345,458.50⁹, an increase of \$82,795,352.50. This data
5 shows that service disconnections are increasing for AEP Ohio consumers.

6
7 Second, AEP Ohio consumers would not benefit from a bill increase as proposed
8 in the Settlement. The ESP bill increase would occur when consumers are
9 experiencing higher electricity rates, along with inflation. This means some
10 consumers may have to choose between paying their electric bills and paying for
11 basic needs such as groceries, gasoline, and rent. Since June 1, 2023, AEP Ohio's
12 SSO increased by 4.355 cents from 6.622¹⁰ to 10.977 cents per kWh.¹¹ That is
13 approximately a 65% increase in generation costs.

14
15 Third, AEP Ohio conducted more service disconnections for non-payment than
16 AES Ohio, Cleveland Electric Illuminating, Duke Energy Ohio, Ohio Edison, and
17 Toledo Edison combined. From June 1, 2022, through May 31, 2023, AEP Ohio

⁶ *Id.*

⁷ *Id.*

⁸ *Id.*

⁹ *Id.*

¹⁰ 22-486-EL-RDR.

¹¹ 23-482-EL-RDR.

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1 disconnected 155,398¹² residential consumers. During that same time frame, all

2 other electric distribution utilities (“EDU”) combined disconnected 125,481.¹³

3 Also, AEP Ohio disconnected a higher percentage of their residential consumers

4 than any other EDU at 11.7%. AES Ohio and Toledo Edison had the second

5 highest percentage of residential consumers disconnected at 5.4%.

6
7 It is not in the public interest to increase rates when AEP Ohio’s disconnection

8 rates are significantly higher compared to other EDU’s.

9
10 Fourth, AEP Ohio disconnected more consumers than were reconnected from

11 June 1, 2022, through May 31, 2023. During that time frame, AEP Ohio

12 disconnected 155,398,¹⁴ but only reconnected 136,578.¹⁵ 18,820 of AEP Ohio

13 residential consumers were never reconnected.

14
15 Fifth, 47.5% of AEP Ohio service disconnections in 2022 occurred in twenty zip

16 codes. Table I provides a list of the number of service disconnections in the top 20

17 zip codes in the AEP Ohio service territory obtained through discovery in OCC-

18 INT-02-001.

¹² 23-532-GE-UNC, Annual Report of Service Disconnections for Non-Payment of Ohio Power Company.

¹³ 23-532-GE-UNC, Annual Report of Service Disconnections for Nonpayment of AES Ohio, Cleveland Electric Illuminating, Duke Energy, Ohio Edison, and Toledo Edison.

¹⁴ *Id.*

¹⁵ *Id.*

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Table I

Zip Code ¹⁶	Service Disconnections ¹⁷
43232	5989
43229	5585
43228	5014
43224	4766
43204	4440
43207	4253
43213	4130
43068	4109
43211	3766
43227	3375
43223	3225
43055	3000
43219	2886
43206	2520
43701	2377
43230	2305
43123	2062
44705	2060
45601	1876
43205	1791

1

2 The Settlement does not address reducing service disconnection by zip code.

3

4 ***Q10. ARE THERE HEALTH AND SAFETY CONCERNS DUE TO THE***
5 ***DISCONNECTION OF SERVICE OR FORGOING OTHER EXPENSES TO***
6 ***PAY THE ELECTRIC BILL?***

7

8 ***A10.*** Yes.

¹⁶ OCC-INT-02-001.

¹⁷ *Id.*

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1 **Q11. PLEASE EXPLAIN.**

2 **A11.** The disconnection of essential electric service jeopardizes the health and safety of
3 consumers, especially during the Summer and Winter months. Electric service is
4 critical for households to maintain lighting, heating that requires electricity,
5 electricity hot water heating, cooling (air conditioners and fans), medical devices,
6 refrigeration of perishable food and medicine, and electric cooking appliances.

7

8 Even if a consumer is able to pay the electric bill, they could experience other
9 health and safety needs due to a lack of funds. An article from The Conversation
10 states:

11 We have found that over half of all low-income
12 households engage in some coping strategies, and most of
13 them find they need multiple strategies at once.

14

15 They might leave the air conditioner off in summer,
16 allowing the heat to reach uncomfortable and potentially
17 unsafe temperatures to reduce costs. Or they might forgo
18 food or medicine to pay their energy bills, or strategically
19 pay down one bill rather than another, known as “bill
20 balancing.” Others turn to payday loans that might help
21 temporarily but ultimately put them in deeper debt. In our
22 research, we have found that the most common coping
23 strategies are also the most risky.¹⁸

¹⁸ Carley, Sanya and David Konisky, “America faces a power disconnection crisis amid rising heat: In 31 states, utilities can shut off electricity for nonpayment in a heat wave,” The Conversation.

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Also, a National Energy Assistance Directors' Association report stated:

Many of the LIHEAP recipients faced significant medical and health problems in the past five years, partly as a result of high energy costs.

- 24 percent went without food for at least one day.
- 37 percent went without medical or dental care.
- 34 percent did not fill a prescription or took less than the full dose of a prescribed medication.
- 19 percent had someone in the home become sick because the home was too cold.¹⁹

Q12. IS THERE A STATE POLICY THAT ADDRESSES AFFORDABILITY IN REGARD TO THE PRICE OF ELECTRICITY?

A12. Yes. R.C. 4928.02(A) and (L), sets forth the state's policy concerning reasonably priced retail electric service and the protection of at-risk populations. R.C. 4928.02(A) and (L) state:

(A) Ensure the availability to consumers of adequate, reliable, safe, efficient, nondiscriminatory, and reasonably priced retail electric service; and

(L) Protect at-risk populations, including, but not limited to, when considering the implementation of any new advanced energy or renewable energy resource.

The Settlement does not protect at-risk consumers, which goes against regulatory policy and principles.

¹⁹ National Energy Assistance Directors' Association, *2011 National Energy Assistance Survey* (November 2011), at 7, available at: https://neada.org/wp-content/uploads/2013/05/FINAL_NEADA_2011_Summary_Report1.pdf.

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1 **Q13. WHAT ARE YOUR RECOMMENDATIONS TO LOWER AEP OHIO**
2 **SERVICE DISCONNECTIONS?**

3
4 **A13.** To the benefit of AEP Ohio consumers and the public interest, along with
5 protecting at-risk²⁰ consumers, the PUCO should require a reduction in service
6 disconnections by 15%. Within that 15%, the PUCO should require a 15%
7 reduction in service disconnection within the top 20 zip codes with the highest
8 number of disconnections. When using 2022 data, that would reduce service
9 disconnections by 21,910 in AEP Ohio's service territory, of which, a 10,429
10 reduction would need to occur in the top 20 zip codes. If AEP Ohio does not meet
11 these service disconnection requirements mentioned above on an annual basis,
12 AEP Ohio would be mandated to contribute \$100,000 from shareholders towards
13 bill assistance payment programs.

14
15 Also, for transparency, the disconnection data should be made public, not just
16 provided to the PUCO. Also, the disconnection data should be provided on a
17 quarterly basis, not annually.

18
19 For the OCC, disconnection data by zip code would allow our Outreach and
20 Education Specialists to focus education efforts on zip codes to promote utility
21 assistance programs and ways to reduce electric consumption. The information
22 would also be helpful to social service organizations and energy assistance

²⁰ R.C. 4928.02(L).

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1 providers/community action agencies to identify zip codes with the greatest need
2 for electric bill assistance.

3
4 Finally, the PUCO should require a quarterly collaborative meeting between AEP
5 Ohio, PUCO, OCC, and other interested parties to explore and implement ways
6 AEP Ohio can reduce service disconnections.

7

8 ***Q14. PLEASE EXPLAIN AEP OHIO'S NEIGHBOR-TO-NEIGHBOR PROGRAM***
9 ***AGREED TO IN THE SETTLEMENT.***

10

11 ***A14.*** As part of the Settlement, AEP Ohio would take \$400,000 annually collected
12 through the Energy Efficiency Rider to fund the Neighbor-to-Neighbor bill
13 payment assistance program, which leverages customer donations. Currently, the
14 Neighbor-to-Neighbor program assists consumers who meet the specific criteria.

15

16 ***Q15. PLEASE EXPLAIN WHY THE PROPOSED SETTLEMENT RELATED TO***
17 ***THE NEIGHBOR-TO-NEIGHBOR PROGRAM DOES NOT BENEFIT***
18 ***CUSTOMERS AND THE PUBLIC INTEREST.***

19

20 ***A15.*** AEP Ohio consumers should not be tasked to fund the Neighbor-to-Neighbor
21 program through a monthly charge through the Energy Efficiency Rider, which
22 increases the electric bill for all ratepayers, including PIPP consumers.

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1 ***Q16. WHAT ARE YOUR RECOMMENDATIONS ON THE NEIGHBOR-TO-***
2 ***NEIGHBOR PROGRAM?***

3
4 ***A16.*** The current Neighbor-to-Neighbor program funding should be increased to \$1.5
5 million annually, and funded by shareholders and optional customer donations,
6 not consumers. Also, a new \$1 million-dollar annual bill payment assistance
7 program should be established that is funded by shareholders to assist consumers
8 in the top 20 zip codes with the highest disconnection rates.

9
10 Both bill payment assistance programs would help reduce service disconnections
11 through the AEP Ohio service territory and the top 20 zip codes with the highest
12 number of disconnections.

13

14 ***Q17. DOES THE SETTLEMENT PROTECT AT-RISK CONSUMERS BY***
15 ***ADDRESSING THE PIPP GENERATION AUCTION?***

16
17 ***A17.*** No.

18

19 ***Q18. WHAT IS THE PIPP GENERATION AUCTION?***

20 ***A18.*** On an annual basis, a competitive auction is conducted to procure a generation
21 rate that PIPP consumers pay for electric generation on a per kWh basis. This is
22 the only way PIPP consumers can procure electricity. Also, an annual competitive
23 auction is conducted to secure the non-PIPP SSO rate, which is the rate a
24 consumer pays for electric generation if they do not select a third-party energy
25 marketer.

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1 **Q19. PLEASE EXPLAIN HOW THE PIPP AUCTION DOES NOT BENEFIT AT-**
2 **RISK PIPP CONSUMERS IN ACCORDANCE WITH R.C. 4928.02(L).**

3
4 **A19.** AEP Ohio PIPP consumers have paid a higher generation rate compared to the
5 SSO two out the last three years. In particular, PIPP consumers paid more than
6 double the SSO rate from June 1, 2022, through May 31, 2023. During that time
7 frame, PIPP generation consumers paid 15.367²¹ cents per kWh, while SSO
8 consumers paid 6.6220 cents per kWh.²² At-risk PIPP consumers were burdened
9 to pay more than double the amount an SSO consumer paid for electric generation
10 from June 1, 2022, through May 31, 2023.

11
12 **Q20. PLEASE EXPLAIN HOW THE PIPP AUCTION DOES NOT BENEFIT AEP**
13 **OHIO CONSUMERS AND THE PUBLIC INTEREST.**

14
15 **A20.** The USF rider is a funding mechanism for providing electric bill payment
16 assistance through PIPP, the Electric Partnership Program (EPP), along with
17 certain administrative fees. A higher PIPP generation rate is harmful to consumers
18 (PIPP and Non-PIPP) as they will be responsible for paying a higher USF rate.

²¹ 89-6007-EL-TRF, Revised Tariffs Sheets, PUCO No. 21 (May 27, 2022).

²² *Id.*

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1 **Q21. WHAT ARE YOUR RECOMMENDATIONS TO PROTECT AT-RISK**
2 **CONSUMERS AND THE PUBLIC INTEREST?**

3
4 **A21.** To protect at-risk PIPP consumers and the public interest, the PUCO should
5 require the PIPP generation rate to be at or below the SSO rate. If the PIPP
6 generation auction results are a higher rate than the SSO, the PIPP generation rate
7 should default to the SSO rate.

8
9 Consumers would benefit by reducing the amount paid through the USF. Also,
10 PIPP consumers would be guaranteed to not pay a generation rate higher than the
11 SSO. That would benefit PIPP consumers by lowering the arrearages, which is the
12 difference between the monthly PIPP amount and the actual bill.

13
14 **Q22. PLEASE EXPLAIN THE AUTOMAKER CREDIT RIDER THAT AEP OHIO**
15 **PROPOSED TO CONTINUE IN ESP V?**

16
17 **A22.** Currently, the Automaker Credit Rider collects up to \$500,000 annually from all
18 customers, including residential consumers. The Automaker Credit Rider is
19 available to automakers utilizing and expanding automaker facilities.²³

20
21 **Q23. SHOULD RESIDENTIAL CONSUMERS BE RESPONSIBLE TO PAY**
22 **TOWARDS THE AUTOMAKER CREDIT RIDER?**

23
24 **A23.** No.

²³ Ohio Power Tariff, Original Sheet No. 472-1,
<https://www.aepohio.com/lib/docs/ratesandtariffs/Ohio/September2023AEPOhioTariffBook.pdf>.

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1 **Q24. PLEASE EXPLAIN.**

2 **A24.** The Automaker Credit Rider goes against the public interest by having residential
3 consumers subsidize the automaker industry. As I mentioned earlier in my
4 testimony, consumers are already facing higher electric bills due to the increase in
5 the SSO, along with inflation, especially on basic necessities (groceries, gasoline,
6 rent). Extra money collected from residential consumers through the Automaker
7 Credit Rider takes more money out of the pockets of hardworking Ohioans who
8 are trying to make ends meet.

9

10 **Q25. DOES THE AUTOMAKER CREDIT RIDER GO AGAINST REGULATORY**
11 **PRINCIPLES?**

12

13 **A25.** Yes.

14

15 **Q26. PLEASE EXPLAIN.**

16 **A26.** The Automaker Credit Rider should only be considered if it qualifies as an
17 economic development project. If automakers need a reduction in their electric
18 bills, they have the opportunity to apply for a special arrangement under R.C.
19 4905.31.

20

21 **Q27. WHAT IS R.C. 4905.31?**

22 **A27.** The statute states that:

23 Chapters 4901., 4903., 4905., 4907., 4909., 4921., 4923.,
24 4927., 4928., and 4929. of the Revised Code do not
25 prohibit a public utility from filing a schedule or
26 establishing or entering into any reasonable arrangement

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1 with another public utility or with one or more of its
2 customers, consumers, or employees, and do not prohibit a
3 mercantile customer of an electric distribution utility as
4 those terms are defined in section 4928.01 of the Revised
5 Code or a group of those customers from establishing a
6 reasonable arrangement with that utility or another public
7 utility electric light company, providing for any of the
8 following:
9

- 10 (A) The division or distribution of its surplus profits;
11
12 (B) A sliding scale of charges, including variations in
13 rates based upon stipulated variations in cost as
14 provided in the schedule or arrangement;
15
16 (C) A minimum charge for service to be rendered unless
17 such minimum charge is made or prohibited by the
18 terms of the franchise, grant, or ordinance under
19 which such public utility is operated;
20
21 (D) A classification of service based upon the quantity
22 used, the time when used, the purpose for which
23 used, the duration of use, and any other reasonable
24 consideration;
25
26 (E) Any other financial device that may be practicable
27 or advantageous to the parties interested.
28

29 In the case of a schedule or arrangement concerning a
30 public utility electric light company, such other financial
31 device may include a device to recover costs incurred in
32 conjunction with any economic development and job
33 retention program of the utility within its certified territory,
34 including recovery of revenue foregone as a result of any
35 such program; any development and implementation of
36 peak demand reduction and energy efficiency programs
37 under section 4928.66 of the Revised Code; any acquisition
38 and deployment of advanced metering, including the costs
39 of any meters prematurely retired as a result of the
40 advanced metering implementation; and compliance with
41 any government mandate.
42

43 No such schedule or arrangement is lawful unless it is filed
44 with and approved by the commission pursuant to an
45 application that is submitted by the public utility or the

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mercantile customer or group of mercantile customers of an electric distribution utility and is posted on the commission's docketing information system and is accessible through the internet.

Every such public utility is required to conform its schedules of rates, tolls, and charges to such arrangement, sliding scale, classification, or other device, and where variable rates are provided for in any such schedule or arrangement, the cost data or factors upon which such rates are based and fixed shall be filed with the commission in such form and at such times as the commission directs.

Every such schedule or reasonable arrangement shall be under the supervision and regulation of the commission, and is subject to change, alteration, or modification by the commission.

While I am not an attorney, my understanding is that this law provides a way for large industrial and commercial customers (like automakers) to seek favorable electric service rates, terms and conditions from a utility by filing an application with the PUCO.

Q28. WHAT IS YOUR RECOMMENDATION TO CONTINUE THE AUTOMAKER CREDIT RIDER IN ESP V?

A28. The PUCO should reject the settlement because the Automaker Credit Rider goes against the public interest and regulatory principles. If automakers need a reasonable arrangement, they should go through the process outlined in R.C. 4905.31. The process would place the burden of proof on the customer that seeks to have other consumers subsidize their discount.

1 **IV. CONCLUSION**

2

3 ***Q29. WHAT IS YOUR OVERALL CONCLUSION REGARDING THE***
4 ***SETTLEMENT?***

5

6 ***A29.*** The Settlement does not meet the criteria for approval by the PUCO and should
7 be rejected.

8

9 ***Q30. DOES THIS CONCLUDE YOUR TESTIMONY?***

10 ***A30.*** Yes. However, I reserve the right to incorporate new information that may
11 subsequently become available. I also reserve the right to supplement my
12 testimony in the event that AEP Ohio, the PUCO Staff or other parties submit
13 new or corrected information in connection with this proceeding.

CERTIFICATE OF SERVICE

I hereby certify that a copy of this Testimony Recommending Modification of the Stipulation of Andrew R. Tinkham on Behalf of the Office of the Ohio Consumers' Counsel was served on the persons stated below via electronic transmission, this 20th day of September 2023.

/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:

SERVICE LIST

werner.margard@ohioago.gov	stnourse@aep.com
ambrosia.wilson@ohioago.gov	mjschuler@aep.com
ashley.wnek@ohioago.gov	egallon@porterwright.com
mkurtz@BKLawfirm.com	christopher.miller@icemiller.com
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jkylercohn@BKLawfirm.com	dromig@armadapower.com
knordstrom@theOEC.org	bojko@carpenterlipps.com
ctavenor@theOEC.org	easley@carpenterlipps.com
little@litohio.com	tdougherty@theoec.org
hogan@litohio.com	paul@carpenterlipps.com
ktreadway@oneenergyltc.com	wilcox@carpenterlipps.com
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Attorney Examiners:

greta.see@puco.ohio.gov

david.hicks@puco.ohio.gov

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Report)	
Required by R.C. 4933.123 Regarding)	Case No. 22-513-GE-UNC
Service Disconnections for Nonpayment)	

**REPORT OF SERVICE DISCONNECTIONS FOR NONPAYMENT
OF OHIO POWER COMPANY**

Pursuant to R.C. 4933.123, Ohio Power Company hereby files the attached Report of Service Disconnections for Nonpayment. As required by R.C. 4933.123(B), the attached report contains the following information by month for the 12-month period ending May 31, 2022:

- a) Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections;
- b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices;
- c) Total number of residential customer accounts in arrears by more than sixty days and the total dollar amount of such arrearages;
- d) Total number of security deposits received from residential customers and the total dollar amounts of such deposits;
- e) Total number of service reconnections; and
- f) Total number of residential Customers.

Disconnection of service is always a last resort. Our main priority is to help all customers maintain their electric service. We have assistance programs available, and all notices encourage customers to call us and work with a customer service representative to help them keep their service connected. A typical AEP Ohio customer is notified 3 or more times of a pending

disconnection. Customers receive messages on their bill after missing a payment, 10 days before disconnection, and a phone call 48-hours before the disconnection date. Customer have about 60 days to take action to prevent disconnection of their service. Only about 10% of customers who receive a final disconnection notice are actually disconnected.

Our use of advanced meters allows us to reconnect customers quickly. During the reporting period, greater than 75% of all remotely disconnected residential customers were reconnected the same day, while greater than 70% of all disconnected customers were reconnected the same day. When a payment is made on a disconnected account, remotely disconnected AMI customers are reconnected within 1 minute, while non-AMI customers are manually reconnected, on average, in 176.4 minutes (approximately 3 hours). As of May 31, 2022, AEP Ohio had 947,189 residential customers with AMI meters. As part of the Company's approved gridSMART Phase 3 plan, all remaining AEP Ohio customers will receive AMI meters. Starting December 1, 2021, the Company eliminated reconnection fees to all residential customers due to the cost savings associated with AMI meters.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215-2373

Telephone: (614) 716-1608

Facsimile: (614) 716-2950 stnourse@aep.com

Counsel for Ohio Power Company

Ohio Power Company
R.C. 4933-123 Service Disconnections for Nonpayment Report

For the 12-month period ending May 31, 2022:

(a) Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections

Ohio Power		
	Service Disconnection	Dollar Amount Unpaid Bills
June, 2021	14,787	\$1,902,947
July, 2021	13,619	\$1,705,320
August, 2021	15,922	\$1,872,025
September, 2021	15,947	\$1,833,326
October, 2021	16,978	\$1,580,677
November, 2021	14,864	\$1,162,558
December, 2021	11,938	\$1,007,037
January, 2022	5,308	\$504,273
February, 2022	10,925	\$2,100,198
March, 2022	15,684	\$2,807,720
April, 2022	13,934	\$2,408,479
May, 2022	13,843	\$2,278,241
Total	163,749	\$21,162,801

(b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices

Ohio Power		
	Final Notice of Disconnection	Dollar Amount for Notices
June, 2021	128,568	\$31,966,467
July, 2021	128,866	\$32,361,785
August, 2021	143,748	\$38,694,612
September, 2021	143,240	\$38,824,192
October, 2021	144,006	\$38,262,031
November, 2021	133,188	\$32,077,979
December, 2021	132,507	\$29,596,442
January, 2022	147,720	\$42,785,595
February, 2022	150,121	\$48,452,465
March, 2022	158,802	\$51,182,973
April, 2022	134,857	\$38,903,539
May, 2022	128,212	\$36,442,026
Total	1,673,835	\$459,550,106

(c) Total number of residential customer accounts in arrears by more than 60 days and the total dollar amount of such arrearages

Ohio Power		
	Arrears > 60 Days	Dollar Amount Presented
June, 2021	72,889	\$16,732,783
July, 2021	74,688	\$16,962,283
August, 2021	77,226	\$20,545,488
September, 2021	82,861	\$21,982,676
October, 2021	85,105	\$22,366,365
November, 2021	88,503	\$20,828,060
December, 2021	81,912	\$17,045,214
January, 2022	80,116	\$18,696,684
February, 2022	85,877	\$27,356,842
March, 2022	80,642	\$25,489,214
April, 2022	83,545	\$23,873,199
May, 2022	86,692	\$21,305,505
Total	980,056	\$253,184,313

(d) Total number of security deposits received from residential customers and the total dollar amount of such deposits

Ohio Power		
	# Security Deposits	Dollar Amount Represented
June, 2021	35,330	\$2,328,072
July, 2021	55,846	\$3,978,811
August, 2021	27,202	\$1,799,347
September, 2021	24,371	\$1,523,357
October, 2021	41,254	\$2,546,368
November, 2021	46,483	\$2,881,835
December, 2021	36,807	\$2,276,194
January, 2022	24,425	\$1,542,131
February, 2022	24,168	\$1,466,341
March, 2022	34,404	\$2,220,134
April, 2022	25,792	\$1,628,319
May, 2022	29,802	\$1,933,155
Total	405,884	\$26,124,064

(e) Total number of service reconnections

Ohio Power	
	# Service Reconnections
June, 2021	12,916
July, 2021	12,084
August, 2021	14,078
September, 2021	14,102
October, 2021	15,480
November, 2021	13,490
December, 2021	11,001
January, 2022	4,754
February, 2022	9,319
March, 2022	13,721
April, 2022	12,410
May, 2022	12,135
Total	145,490

(f) Total number of residential customers

Ohio Power	
	# Residential Customers
June, 2021	1,313,185
July, 2021	1,313,147
August, 2021	1,313,403
September, 2021	1,314,525
October, 2021	1,315,206
November, 2021	1,316,809
December, 2021	1,316,805
January, 2022	1,318,641
February, 2022	1,319,239
March, 2022	1,319,646
April, 2022	1,324,986
May, 2022	1,318,500

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Report of Service Disconnections for Nonpayment* was served on the Office of the Ohio Consumers' Counsel, 65 E. State Street, 7th Floor, Columbus, Ohio 43215-4213, this 30th day of June, 2022.

/s/ Steven T. Nourse

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
6/30/2022 2:25:27 PM**

in

Case No(s). 22-0513-GE-UNC

Summary: Report Report of Service Disconnections for Non-payment. electronically
filed by Mr. Steven T. Nourse on behalf of Ohio Power Company

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Report)	
Required by R.C. 4933.123 Regarding)	Case No. 23-0532-GE-UNC
Service Disconnections for Nonpayment)	

**REPORT OF SERVICE DISCONNECTIONS FOR NONPAYMENT
OF OHIO POWER COMPANY**

Pursuant to R.C. 4933.123, Ohio Power Company hereby files the attached Report of Service Disconnections for Nonpayment. As required by R.C. 4933.123(B), the attached report contains the following information by month for the 12-month period ending May 31, 2023:

- a) Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections;
- b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices;
- c) Total number of residential customer accounts in arrears by more than sixty days and the total dollar amount of such arrearages;
- d) Total number of security deposits received from residential customers and the total dollar amounts of such deposits;
- e) Total number of service reconnections; and
- f) Total number of residential Customers.

Disconnection of service is always a last resort. Our main priority is to help all customers maintain their electric service. We have assistance programs available, and all notices encourage customers to call us and work with a customer service representative to help them keep their service connected. A typical AEP Ohio customer is notified 3 or more times of a pending

disconnection. Customers receive messages on their bill after missing a payment, 10 days before disconnection, and a phone call 48-hours before the disconnection date. Customer have about 60 days to take action to prevent disconnection of their service. Only about 9% of customers who receive a final disconnection notice are actually disconnected.

Our use of advanced meters allows us to reconnect customers quickly. During the reporting period, approximately 78% of all disconnected customers were reconnected the same day. When a payment is made on a disconnected account, remotely disconnected AMI customers are reconnected within 1 minute. As of May 31, 2023, AEP Ohio had 953,173 residential customers with AMI meters. As part of the Company's approved gridSMART Phase 3 plan, all remaining AEP Ohio customers will receive AMI meters. Starting December 1, 2021, the Company eliminated reconnection fees to all residential customers due to the cost savings associated with AMI meters.

Respectfully submitted,

/s/ Michael J. Schuler

Michael J. Schuler (0082390)

*Counsel of Record

Steven T. Nourse (0046705)

American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215-2373

Telephone: (614)716-2928 (Schuler)

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mjschuler@aep.com

stnourse@aep.com

Counsel for Ohio Power Company

Ohio Power Company
R.C. 4933-123 Service Disconnections for Nonpayment Report

For the 12-month period ending May 31:

(a) Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections

Ohio Power		
	Service Disconnection	Dollar Amount Unpaid Bills
June, 2022	5,317	\$2,092,215.03
July, 2022	9,531	\$4,243,573.29
August, 2022	16,674	\$7,215,676.13
September, 2022	16,101	\$6,771,820.49
October, 2022	15,581	\$5,979,837.59
November, 2022	13,318	\$4,481,782.60
December, 2022	9,859	\$3,227,486.67
January, 2023	11,715	\$4,296,651.54
February, 2023	13,174	\$5,803,228.36
March, 2023	15,729	\$6,912,938.58
April, 2023	13,200	\$5,939,023.88
May, 2023	15,199	\$6,590,001.49
Total	155,398	\$63,554,235.65

(b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices

Ohio Power		
	Final Notice of Disconnection	Dollar Amount for Notices
June, 2022	136,984	\$36,766,342.40
July, 2022	142,939	\$40,982,772.74
August, 2022	175,523	\$54,656,789.56
September, 2022	162,423	\$51,191,589.50
October, 2022	150,593	\$45,384,327.89
November, 2022	134,534	\$36,510,533.41
December, 2022	139,179	\$35,538,054.35
January, 2023	153,847	\$46,104,800.38
February, 2023	151,674	\$51,450,476.46
March, 2023	160,916	\$54,515,463.85
April, 2023	130,789	\$42,336,699.85
May, 2023	149,727	\$46,907,698.11
Total	1,789,128	\$542,345,548.50

(c) Total number of residential customer accounts in arrears by more than 60 days and the total dollar amount of such arrearages

Ohio Power		
	Arrears > 60 Days	Dollar Amount Presented
June, 2022	92,194	\$20,688,610
July, 2022	96,385	\$22,435,745
August, 2022	119,153	\$28,136,620
September, 2022	101,238	\$28,731,756
October, 2022	98,422	\$26,868,865
November, 2022	96,043	\$23,158,938
December, 2022	90,887	\$19,412,377
January, 2023	88,711	\$20,117,240
February, 2023	94,058	\$25,753,032
March, 2023	91,010	\$25,446,056
April, 2023	93,173	\$24,401,063
May, 2023	95,391	\$23,611,706
Total	1,156,665	288,762,008

(d) Total number of security deposits received from residential customers and the total dollar amount of such deposits

Ohio Power		
	# Security Deposits	Dollar Amount Represented
June, 2022	27,563	\$1,786,046
July, 2022	27,378	\$1,714,061
August, 2022	31,945	\$2,092,148
September, 2022	29,392	\$1,839,716
October, 2022	33,603	\$2,174,370
November, 2022	33,382	\$2,097,342
December, 2022	31,780	\$1,963,807
January, 2023	33,062	\$2,023,289
February, 2023	32,688	\$2,001,394
March, 2023	34,898	\$2,233,800
April, 2023	40,741	\$2,663,559
May, 2023	38,847	\$2,619,118
Total	395,279	\$25,208,650

(e) Total number of service reconnections

Ohio Power	
	# Service Reconnections
June, 2022	4,833
July, 2022	7,574
August, 2022	14,299
September, 2022	14,238
October, 2022	14,298
November, 2022	12,168
December, 2022	8,933
January, 2023	9,842
February, 2023	11,769
March, 2023	13,912
April, 2023	11,532
May, 2023	13,180
Total	136,578

(f) Total number of residential customers

Ohio Power	
	# Residential Customers
June, 2022	1,318,000
July, 2022	1,319,168
August, 2022	1,319,246
September, 2022	1,319,598
October, 2022	1,319,718
November, 2022	1,321,135
December, 2022	1,322,680
January, 2023	1,327,213
February, 2023	1,328,214
March, 2023	1,328,768
April, 2023	1,328,001
May, 2023	1,328,753

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Report of Service Disconnections for
Nonpayment was served on the Office of the Ohio Consumers' Counsel, 65 E. State Street, 7th
Floor, Columbus, Ohio 43215-4213, this 30th day of June, 2023.

/s/ Michael J. Schuler
Michael J. Schuler (0082390)

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

6/30/2023 5:01:19 PM

in

Case No(s). 23-0532-GE-UNC

Summary: Report REPORT OF SERVICE DISCONNECTIONS FOR
NONPAYMENT OF OHIO POWER COMPANY electronically filed by Michael J.
Schuler on behalf of Ohio Power Company.

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Annual Report Required)	Case No. 23-0532-GE-UNC
by R.C.4933.123 Regarding Service)	
Disconnections)	
)	

**AES OHIO ANNUAL REPORT OF
SERVICE DISCONNECTIONS FOR NONPAYMENT**

Pursuant R.C. 4933.123 and the May 31, 2023 Entry in this proceeding, The Dayton Power and Light Company d/b/a AES Ohio files the attached Annual Report of Service Disconnections for Nonpayment.

Respectfully submitted,

/s/ Christopher C. Hollon
Christopher C. Hollon (0086480)
AES Ohio
1065 Woodman Drive
Dayton, OH 45432
Telephone: (937) 259-7358
Email: christopher.hollon@aes.com

Counsel for AES Ohio

(willing to accept service by e-mail)

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document was e-filed with the Public Utilities Commission of Ohio on June 15, 2023. The PUCO's e-filing system will electronically serve notice of the filing of this document.

In addition, pursuant to the May 31, 2023 Entry in this proceeding, the foregoing document was submitted by email to the following:

Robert Fadley
Director of Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio
robert.fadley@puco.ohio.gov

Andrew Tinkham
Utility Consumer Program Specialist
Office of the Ohio Consumers' Counsel
andrew.tinkham@occ.ohio.gov

/s/ Christopher C. Hollon
Christopher C. Hollon

AES Ohio
Annual Report of Service Disconnections for Nonpayment - ORC 4933.123
June 2022 - May 2023

Month / Year	ORC 4933.123(B)(1)		ORC 4933.123(B)(2)		ORC 4933.123(B)(3)		ORC 4933.123(B)(4)		ORC 4933.123(B)(5)	ORC 4933.123(B)(6)
	Total # of Service Disconnections for Nonpayment	Total Dollar Amount of Unpaid Bills Represented by Such Notices	Total # of Final Notices of Disconnection Issued	Total Dollar Amount of Unpaid Bills Represented by Disconnection Notices Issued	Total # of Residential Customers in Arrears by More than 60 Days	Total Dollar Amount of Residential Customers in Arrears by more than 60 days	Total # of Security Deposits Received from Residential Customers	Total Dollar Amount of Deposits Received from Residential Customers	Total # of Service Reconnections	Total # of Residential Customers
Jun-22	2,985	\$1,367,205	24,971	\$7,543,336	46,037	\$12,947,261	3,621	\$393,895	2,199	476,087
Jul-22	2,268	\$976,695	22,950	\$5,842,661	41,263	\$11,466,744	3,664	\$389,316	1,914	476,031
Aug-22	2,838	\$1,274,760	32,291	\$8,504,044	37,929	\$10,751,873	3,956	\$433,885	2,091	475,986
Sep-22	2,894	\$1,254,144	32,114	\$8,210,067	37,902	\$11,312,909	3,736	\$431,973	2,304	476,246
Oct-22	2,803	\$1,126,140	17,249	\$4,576,845	40,401	\$12,616,296	3,588	\$466,038	2,235	476,260
Nov-22	862	\$369,788	16,470	\$5,493,500	46,023	\$14,440,618	3,226	\$436,369	786	476,693
Dec-22	1,515	\$657,556	9,896	\$2,765,236	45,620	\$12,734,919	2,983	\$428,827	1,143	477,238
Jan-23	1,619	\$791,329	11,948	\$4,093,982	42,665	\$12,364,966	3,560	\$534,758	1,174	477,511
Feb-23	1,653	\$953,433	12,581	\$4,053,884	46,239	\$13,407,762	3,082	\$491,235	1,088	477,529
Mar-23	1,691	\$859,830	13,395	\$4,735,755	57,278	\$15,694,587	3,338	\$539,226	1,257	477,620
Apr-23	1,593	\$918,111	20,517	\$6,967,086	64,084	\$17,919,078	2,950	\$480,913	1,102	477,684
May-23	2,890	\$1,474,268	32,471	\$11,086,871	63,205	\$18,013,261	3,677	\$586,901	2,091	477,745

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

6/15/2023 4:22:29 PM

in

Case No(s). 23-0532-GE-UNC

Summary: Report Annual Report of Service Disconnections for Nonpayment
electronically filed by Mrs. Tres Dobbs on behalf of The Dayton Power and Light
Company d/b/a AES Ohio.

BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Annual Report)
Required by Section 4933.123 Regarding) Case No. 23-532-GE-UNC
Service Disconnections for Nonpayment.)

**DUKE ENERGY OHIO, INC.'S
REPORT OF SERVICE DISCONNECTIONS FOR
NONPAYMENT**

Pursuant to the Public Utilities Commission of Ohio's Entry in this docket, dated May 31, 2023, Duke Energy Ohio, Inc., (Duke Energy Ohio or Company) hereby submits the attached Report of Service Disconnections for Nonpayment. As required by R.C. 4933.123(B), the attached report contains the following information by month, for the 12-month period ending on May 31, 2023:

- a. Total number of service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such disconnections;
- b. Total number of final notices of actual disconnection issued for service disconnections for nonpayment and the total dollar amount of unpaid bills represented by such notices;
- c. Total number of residential customer accounts in arrears by more than sixty days and the total dollar amount of such arrearages;
- d. Total number of security deposits received from residential customers and the total dollar amount of such deposits;
- e. Total number of service reconnections; and
- f. Total number of residential customers.

Respectfully submitted,

/s/ Larisa M. Vaysman

Rocco D'Ascenzo (0077651)

Deputy General Counsel

Jeanne W. Kingery (0012172)

Associate General Counsel

Larisa M. Vaysman (0090290)

Senior Counsel

Elyse H. Akhbari (0090701)

Senior Counsel

Duke Energy Business Services, LLC

139 East Fourth Street, 1303-Main

Cincinnati, Ohio 45202

(513) 287-4320 (telephone)

(513) 370-5720 (fax)

Rocco.D'Ascenzo@duke-energy.com

Jeanne.Kingery@duke-energy.com

Larisa.Vaysman@duke-energy.com

Elyse.Akhbari@duke-energy.com

Counsel for Duke Energy Ohio, Inc.

Willing to accept service via email

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Duke Energy Ohio's Report of Service Disconnections for Nonpayment* was served via electronic mail to Robert Fadley, Director of the Commission's Service Monitoring and Enforcement Department (robert.fadley@puco.ohio.gov), and to Andrew Tinkham, OCC's Utility Consumer Program Specialist, at the Office of the Ohio Consumers' Counsel (andrew.tinkham@occ.ohio.gov), this 22nd day of June, 2023.

/s/ Larisa M. Vaysman

Larisa M. Vaysman

Annual Service Disconnection Information For the
Ohio Commission and Office of Ohio Consumers' Counsel

Disconnects For Non Payment	Month	Year	Number of	ELECTRIC Dollars	Number of GAS	GAS Dollars
			ELECTRIC Customers		Customers	
	Jun	2022	0	\$0	0	\$0
	Jul	2022	171	\$38,422	0	\$0
	Aug	2022	1,258	\$710,955	0	\$0
	Sep	2022	759	\$405,960	0	\$0
	Oct	2022	1,851	\$1,092,098	48	\$18,744
	Nov	2022	446	\$35,244	25	\$5,746
	Dec	2022	2,618	\$2,014,209	10	\$2,268
	Jan	2023	1,855	\$1,240,469	0	\$0
	Feb	2023	2,623	\$1,625,475	145	\$86,265
	Mar	2023	3,381	\$2,088,606	119	\$81,100
	Apr	2023	3,506	\$2,339,244	106	\$84,242
	May	2023	4,591	\$3,229,836	171	\$198,453

Disconnect Notice	Month	Year	Number of	ELECTRIC Dollars	Number of GAS	GAS Dollars
			ELECTRIC Customers		Customers	
	Jun	2022	3,054	\$2,364,906	20	\$18,043
	Jul	2022	15,832	\$11,238,931	204	\$132,790
	Aug	2022	30,739	\$18,877,920	701	\$382,546
	Sep	2022	26,751	\$15,831,376	344	\$172,562
	Oct	2022	28,277	\$17,364,107	538	\$283,473
	Nov	2022	31,962	\$19,964,779	669	\$356,378
	Dec	2022	28,341	\$15,840,006	630	\$218,085
	Jan	2023	31,482	\$18,932,905	936	\$450,089
	Feb	2023	29,429	\$18,655,921	884	\$436,453
	Mar	2023	31,844	\$21,969,219	1,071	\$530,259
	Apr	2023	32,114	\$21,166,363	784	\$415,837
	May	2023	31,718	\$17,825,699	1,135	\$526,377

Residential Accounts > 60 days in arrears	Month	Year	Number of	ELECTRIC Dollars	Number of GAS	GAS Dollars
			ELECTRIC Customers		Customers	
	Jun	2022	115,820	\$26,656,188	46,851	\$10,442,731
	Jul	2022	152,285	\$30,625,167	55,314	\$7,803,920

Aug	2022	131,334	\$25,045,604	48,651	\$11,797,901
Sep	2022	148,210	\$31,293,579	59,945	\$13,027,656
Oct	2022	145,998	\$34,732,830	60,132	\$12,794,526
Nov	2022	149,798	\$36,854,891	65,026	\$13,020,671
Dec	2022	154,264	\$45,949,042	72,784	\$18,900,240
Jan	2023	135,859	\$34,683,798	66,999	\$14,321,987
Feb	2023	130,516	\$34,546,339	64,552	\$15,649,220
Mar	2023	126,130	\$34,382,512	62,545	\$17,070,464
Apr	2023	133,975	\$35,666,508	68,568	\$19,339,865
May	2023	126,166	\$33,492,685	63,868	\$18,735,418

Service Reconnects	Month	Year	Number of Elec	Number of Gas
			Customers	Customers
	Jun	2022	0	0
	Jul	2022	121	0
	Aug	2022	704	6
	Sep	2022	562	16
	Oct	2022	1,127	31
	Nov	2022	420	23
	Dec	2022	1,551	54
	Jan	2023	1,230	20
	Feb	2023	1,697	70
	Mar	2023	2,342	53
	Apr	2023	2,419	25
	May	2023	2,995	28

Residential Customers	Month	Year	Number of
			Customers
	Jun	2022	705,755
	Jul	2022	705,754
	Aug	2022	705,735
	Sep	2022	705,718
	Oct	2022	705,708
	Nov	2022	705,672
	Dec	2022	705,776
	Jan	2023	705,930
	Feb	2023	706,076
	Mar	2023	705,821
	Apr	2023	705,677
	May	2023	705,251

Residential Security Deposits	Month	Year	Number of Customers	Dollars (Gas & Elec)
	Jun	2022	2,788	\$282,838
	Jul	2022	3,208	\$352,897
	Aug	2022	3,997	\$461,220
	Sep	2022	2,483	\$321,061
	Oct	2022	1,999	\$274,796
	Nov	2022	986	\$132,280
	Dec	2022	723	\$90,484
	Jan	2023	388	\$55,265
	Feb	2023	460	\$59,487
	Mar	2023	305	\$42,874
	Apr	2023	184	\$29,534
	May	2023	308	\$42,968

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6/22/2023 3:27:18 PM

in

Case No(s). 23-0532-GE-UNC

Summary: Report Duke Energy Ohio, Inc.'s Report of Service Disconnections For Nonpayment electronically filed by Mrs. Tammy M. Meyer on behalf of Duke Energy Ohio Inc. and D'Ascenzo, Rocco and Vaysman, Larisa and Kingery, Jeanne and Akhbari, Elyse Hanson.

In the Matter of the Annual Report)
Required by R.C. 4933.123 Regarding) Case No. 23-0532-GE-UNC
Service Disconnections for Nonpayment)

Pursuant to O.R.C. § 4933.123, Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company hereby give notice of filing the attached Service Disconnection for Nonpayment Reports.

Respectfully submitted,

Zachary E. Woltz (0096669)

(Counsel of Record)

FIRSTENERGY SERVICE COMPANY

100 East Broad Street, Suite 2225

Columbus, Ohio 43215

(614) 406-2407

zwoltz@firstenergycorp.com

Attorney for Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company

Case No. 23-0532-GE-UNC**The Illuminating Company****Annual Report of Service Disconnections for Nonpayment**

	(a) Total number of service disconnections for nonpayment & the total dollar amount of unpaid bills represented by such disconnections		(b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment & the total dollar amount of unpaid bills represented by such notices		(c) Total number of residential customer accounts in arrears by more than 60 days & the total dollar amount of such arrearages		(d) Total number of security deposits received from residential customers & the total dollar amount of such deposits		(e) Total number of service reconnections	(f) Total number of residential customers
	#	\$	#	\$	#	\$	#	\$	#	#
Jun-22	2,695	\$ 1,186,103.46	77,723	\$ 27,847,984.00	41,464	\$ 12,856,848.85	5,387	\$ 563,872.00	1,435	673,141
Jul-22	3,122	\$ 1,365,785.26	73,890	\$ 26,185,428.00	42,295	\$ 12,024,358.71	5,217	\$ 546,291.00	1,993	671,938
Aug-22	3,963	\$ 1,690,166.91	96,886	\$ 33,422,001.00	40,816	\$ 11,688,829.07	5,063	\$ 536,284.00	2,564	672,409
Sep-22	3,846	\$ 1,535,684.84	89,512	\$ 31,334,683.00	40,411	\$ 11,549,134.33	5,274	\$ 557,372.00	2,988	672,483
Oct-22	3,156	\$ 1,287,702.14	93,902	\$ 33,054,813.00	41,518	\$ 12,321,816.92	4,571	\$ 510,076.00	2,644	672,724
Nov-22	428	\$ 175,877.75	73,239	\$ 23,621,786.00	40,212	\$ 13,178,300.96	3,618	\$ 420,322.00	487	673,697
Dec-22	1,444	\$ 575,019.15	66,663	\$ 20,079,589.00	41,955	\$ 13,246,517.70	3,455	\$ 393,737.00	1,109	673,934
Jan-23	1,048	\$ 626,831.91	73,994	\$ 21,384,201.00	41,336	\$ 12,612,835.03	2,885	\$ 332,052.00	779	674,758
Feb-23	1,300	\$ 528,392.07	68,504	\$ 20,416,824.00	42,533	\$ 12,795,550.54	3,227	\$ 374,011.00	798	674,894
Mar-23	1,248	\$ 789,120.96	75,485	\$ 22,398,865.00	38,999	\$ 11,671,281.60	3,895	\$ 450,707.00	941	675,262
Apr-23	1,755	\$ 934,909.57	61,966	\$ 19,395,842.00	40,567	\$ 12,273,330.93	3,040	\$ 350,554.00	1,156	675,012
May-23	4,147	\$ 2,034,632.81	85,449	\$ 28,239,393.00	39,085	\$ 11,337,916.17	5,145	\$ 594,017.00	2,841	674,541

Case No. 23-0532-GE-UNC**Ohio Edison Company****Annual Report of Service Disconnections for Nonpayment**

	(a) Total number of service disconnections for nonpayment & the total dollar amount of unpaid bills represented by such disconnections		(b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment & the total dollar amount of unpaid bills represented by such notices		(c) Total number of residential customer accounts in arrears by more than 60 days & the total dollar amount of such arrearages		(d) Total number of security deposits received from residential customers & the total dollar amount of such deposits		(e) Total number of service reconnections	(f) Total number of residential customers
	#	\$	#	\$	#	\$	#	\$	#	#
Jun-22	4,034	\$ 1,243,261.32	83,904	\$ 19,101,616.00	30,329	\$ 4,965,392.86	6,058	\$ 751,306.00	2,862	950,243
Jul-22	3,127	\$ 1,044,005.32	81,067	\$ 19,520,746.00	31,318	\$ 5,016,040.60	5,553	\$ 685,471.00	2,286	949,891
Aug-22	4,566	\$ 1,493,487.26	107,328	\$ 26,932,403.00	28,484	\$ 4,587,881.60	6,536	\$ 803,530.00	3044	950,348
Sep-22	3,615	\$ 1,097,653.59	97,198	\$ 24,393,399.00	27,603	\$ 4,652,294.02	6,292	\$ 782,579.00	2,829	951,367
Oct-22	3,384	\$ 1,033,962.14	101,821	\$ 24,991,064.00	28,549	\$ 4,975,548.45	5,531	\$ 703,279.00	2,675	951,845
Nov-22	664	\$ 182,360.07	80,420	\$ 16,998,051.00	27,906	\$ 5,243,923.96	4,486	\$ 575,317.00	622	952,889
Dec-22	1,572	\$ 449,740.87	78,154	\$ 16,482,989.00	30,692	\$ 5,424,784.48	4,088	\$ 525,765.00	1,207	953,241
Jan-23	1,524	\$ 462,012.18	83,646	\$ 18,413,963.00	30,664	\$ 5,517,626.09	3,698	\$ 477,059.00	1,050	953,975
Feb-23	1,673	\$ 499,090.47	81,394	\$ 18,736,767.00	32,066	\$ 5,902,833.22	3,798	\$ 489,269.00	1,019	954,359
Mar-23	1,891	\$ 567,710.20	80,634	\$ 18,873,366.00	26,260	\$ 5,183,893.71	4,618	\$ 595,781.00	1,450	954,530
Apr-23	2,589	\$ 795,776.17	71,362	\$ 17,075,254.00	27,884	\$ 5,671,264.54	3,686	\$ 484,139.00	1,650	954,437
May-23	4,974	\$ 1,599,667.94	88,513	\$ 22,585,504.00	28,294	\$ 5,705,413.66	5,591	\$ 735,920.00	3,486	954,254

Case No. 23-0532-GE-UNC**Toledo Edison Company****Annual Report of Service Disconnections for Nonpayment**

	(a) Total number of service disconnections for nonpayment & the total dollar amount of unpaid bills represented by such disconnections		(b) Total number of final notices of actual disconnection issued for service disconnections for nonpayment & the total dollar amount of unpaid bills represented by such notices		(c) Total number of residential customer accounts in arrears by more than 60 days & the total dollar amount of such arrearages		(d) Total number of security deposits received from residential customers & the total dollar amount of such deposits		(e) Total number of service reconnections	(f) Total number of residential customers
	#	\$	#	\$	#	\$	#	\$	#	#
Jun-22	2,102	\$ 805,380.93	28,772	\$ 7,122,395.00	10,118	\$ 1,949,758.68	2,354	\$ 292,533.00	1,596	277,936
Jul-22	1,481	\$ 588,386.61	28,506	\$ 7,189,069.00	10,359	\$ 1,919,426.18	2,140	\$ 258,232.00	1,159	277,828
Aug-22	1751	\$ 554,275.41	35,593	\$ 9,156,640.00	9,592	\$ 1,888,714.84	2,279	\$ 284,827.00	1,237	277,840
Sep-22	1,858	\$ 628,528.08	33,929	\$ 8,607,395.00	9,225	\$ 1,886,861.35	2,363	\$ 285,675.00	1,521	278,212
Oct-22	1,707	\$ 506,239.10	33,698	\$ 8,303,667.00	9,869	\$ 1,991,808.29	2,014	\$ 251,860.00	1,371	278,201
Nov-22	273	\$ 103,188.51	27,260	\$ 5,765,866.00	10,190	\$ 2,092,545.72	1,761	\$ 222,892.00	248	278,293
Dec-22	587	\$ 214,676.99	28,337	\$ 6,302,823.00	11,394	\$ 2,195,507.06	1,569	\$ 194,039.00	518	278,525
Jan-23	613	\$ 245,409.01	28,706	\$ 6,486,707.00	11,389	\$ 2,237,383.99	1,346	\$ 171,586.00	445	278,718
Feb-23	703	\$ 262,619.62	27,364	\$ 6,667,600.00	11,765	\$ 2,450,450.80	1,414	\$ 176,720.00	470	278,756
Mar-23	731	\$ 293,422.97	29,160	\$ 7,041,921.00	10,121	\$ 2,301,861.25	1,675	\$ 217,809.00	552	278,858
Apr-23	1,000	\$ 339,916.28	26,019	\$ 6,600,016.00	10,473	\$ 2,452,744.67	1,422	\$ 178,237.00	703	278,862
May-23	2,240	\$ 775,151.49	32,032	\$ 8,389,646.00	10,099	\$ 2,304,920.76	2,064	\$ 259,902.00	1,570	278,732

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served via electronic mail on the individuals listed below on June 30, 2023. Further service will be completed as provided by O.A.C. 4901-1-05.

/s/ Zachary E. Woltz

Zachary E. Woltz

*Attorney for Ohio Edison Company, The Cleveland
Electric Illuminating Company, and The Toledo
Edison Company*

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Commission of Ohio Docketing Information System on
6/30/2023 3:32:28 PM**

in

Case No(s). 23-0532-GE-UNC

Summary: Annual Report of Service Disconnections for Nonpayment electronically
filed by Ms. Jill R. Olbrysh Sustar on behalf of Ohio Edison Company and The
Cleveland Electric Illuminating Company and The Toledo Edison Company.

**OHIO POWER COMPANY'S RESPONSE TO
THE OFFICE OF THE OHIO CONSUMERS'
COUNSEL'S
DISCOVERY REQUEST
PUCO CASE 23-0023-EL-SSO
SECOND SET**

INTERROGATORY

OCC-INT-02-001 Please identify the number of residential service disconnections for non-payment on an annual basis for 2019, 2020, 2021, 2022, and 2023 by zip code.

RESPONSE

AEP Ohio objects that the request seeks information that is not relevant or likely to lead to the discovery of admissible information. The Company further objects to the form of the question as this request is vague and overbroad and seeks information that is not kept in the ordinary course of business and would unduly burdensome to compile in the format requested. Without waiving these objections or any general objections the Company may have, the Company states as follows: Please see OCC-INT-02-001 Attachment 1 for disconnections for non-payment on an annual basis for the previous 36 months, broken down between AMI and non-AMI metered accounts, pulled utilizing the order completion date.

Prepared by:

Counsel
Curtis M. Heitkamp

AEP Ohio ESP V
Case 23-23-EL-SSO
OCC-INT-02-001 Attachment 1

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43001		13	13		15	15		17	17			
43003					2	2						
43004	391	3	394	903	14	917	1004	14	1018	150	2	152
43005								1	1			
43006		2	2		5	5		4	4		1	1
43008	102		102	206		206	167		167	22		22
43011		39	39		76	76		58	58		4	4
43013		3	3		9	9		4	4		1	1
43014		35	35		45	45		35	35		5	5
43015	636	26	662	1597	54	1651	1298	52	1350	233	7	240
43016	366	1	367	833	11	844	880	3	883	142	1	143
43017	358		358	868	10	878	904	6	910	140	1	141
43018	3		3	9		9	9		9	3		3
43019		60	60		66	66		46	46		6	6
43021	68	2	70	126	6	132	101	6	107	18	1	19
43022	14		14	26	1	27	18		18	2		2
43023	30	3	33	79	15	94	77	6	83	14	4	18
43025	81	4	85	172	8	180	130	5	135	18		18
43026	661	2	663	1585	33	1618	1467	17	1484	260	3	263
43027					1	1						
43028		21	21		32	32		31	31		2	2
43030		2	2		2	2		3	3			
43031	88	1	89	219	8	227	191	4	195	32	3	35
43032		1	1		2	2		2	2			
43033		5	5		1	1		4	4		2	2
43035	289		289	406	6	412	485	3	488	80	2	82
43037		2	2		2	2		5	5		4	4
43046	6	11	17	18	37	55	22	23	45	5	5	10
43048								2	2			
43050	475	26	501	1001	41	1042	842	29	871	124		124
43054	123		123	302	6	308	313	6	319	52		52
43055	1363	14	1377	3278	48	3326	2956	44	3000	477	7	484
43056	123	17	140	183	25	208	219	49	268	24	4	28

AEP Ohio ESP V
Case 23-23-EL-SSO
OCC-INT-02-001 Attachment 1

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43062	268	14	282	782	52	834	840	36	876	127	10	137
43064		3	3		22	22	1	20	21		2	2
43065	241	2	243	480	5	485	467	8	475	76	2	78
43068	1839	6	1845	4073	36	4109	4070	39	4109	694	12	706
43071					7	7		6	6		1	1
43074	74	3	77	133	11	144	120	17	137	17	2	19
43076	113	4	117	196	10	206	170	5	175	23		23
43080		24	24		61	61		69	69		13	13
43081	645	3	648	1428	19	1447	1507	13	1520	240	3	243
43082	115	1	116	208	5	213	170	6	176	26		26
43085	319	8	327	528	6	534	476	7	483	72	2	74
43105		37	37		70	70		27	27		14	14
43107		16	16		24	24		8	8			
43109	4		4	17		17	6		6	1		1
43110	601	1	602	1156	8	1164	1214	10	1224	232	3	235
43111		3	3		7	7		2	2			
43113	356		356	847		847	788	1	789	120		120
43116				1		1	4		4			
43117		4	4		2	2		2	2			
43119	491	5	496	1372	13	1385	1245	21	1266	237	4	241
43123	1102	44	1146	2285	90	2375	2008	54	2062	345	12	357
43125	262		262	577	2	579	457	2	459	112	1	113
43126		1	1		3	3						
43127		6	6		10	10		5	5			
43130	415	134	549	834	297	1131	862	129	991	128	23	151
43135					2	2		1	1			
43137	16	2	18	33	4	37	30	3	33	6	1	7
43138		109	109		221	221		177	177		23	23
43140		1	1		2	2		2	2			
43143	86	9	95	143	26	169	142	7	149	17		17
43144		6	6		17	17		7	7		1	1
43146	39	19	58	52	34	86	48	24	72	6	2	8
43147	128	1	129	221	4	225	239	2	241	45	1	46

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43148		17	17		25	25		8	8		7	7
43149		4	4		10	10		7	7		2	2
43150		2	2		10	10		4	4			
43152		2	2		1	1		2	2		2	2
43155		4	4		11	11		5	5		1	1
43157		15	15		10	10		6	6		2	2
43158		1	1		8	8		4	4			
43162	104	1	105	343	3	346	273	4	277	49		49
43201	790	1	791	1868	17	1885	1615	20	1635	297	5	302
43202	371		371	933	7	940	860	7	867	129	4	133
43203	531	3	534	1147	10	1157	1023	10	1033	186	5	191
43204	2062	7	2069	4881	38	4919	4413	27	4440	797	7	804
43205	990	13	1003	2090	15	2105	1780	11	1791	312	1	313
43206	1124	4	1128	3044	22	3066	2499	21	2520	397	2	399
43207	1991	18	2009	5410	32	5442	4225	28	4253	827	14	841
43209	749	1	750	1811	15	1826	1619	12	1631	262	3	265
43210				15	1	16						
43211	1855	2	1857	4470	19	4489	3752	14	3766	734	7	741
43212	258	3	261	659	4	663	713	8	721	116	1	117
43213	1737	3	1740	4252	15	4267	4104	26	4130	696	8	704
43214	304	1	305	697	8	705	577	5	582	84	1	85
43215	198	2	200	471	9	480	497	14	511	91	1	92
43219	1378	1	1379	3365	22	3387	2866	20	2886	482	12	494
43220	426		426	1088	6	1094	1185	7	1192	187	6	193
43221	244		244	644	9	653	633	6	639	120	1	121
43222	270	1	271	629		629	554		554	107	1	108
43223	1741	11	1752	3931	28	3959	3200	25	3225	583	9	592
43224	2743	4	2747	5104	22	5126	4739	27	4766	826	5	831
43227	1364	7	1371	3378	25	3403	3365	10	3375	518	6	524
43228	2050	8	2058	5531	37	5568	4967	47	5014	926	15	941
43229	2174	8	2182	5920	50	5970	5547	38	5585	1022	5	1027
43230	968	4	972	2199	24	2223	2274	31	2305	386	11	397
43231	742	2	744	1632	10	1642	1449	21	1470	247	4	251

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43232	2965	3	2968	7214	39	7253	5960	29	5989	1114	11	1125
43235	606	2	608	1482	20	1502	1490	10	1500	230	3	233
43240	85		85	205	4	209	224	1	225	49	2	51
43302		18	18		35	35		28	28		6	6
43314		7	7		9	9		7	7		1	1
43315		6	6		9	9		15	15		1	1
43316					3	3		2	2		1	1
43321		2	2		5	5		2	2		3	3
43323		1	1		1	1	7	3	10	1		1
43325		1	1									
43326	286	11	297	711	16	727	533	18	551	102		102
43330					1	1		1	1			
43332		14	14		15	15		41	41			
43334		25	25		43	43		34	34		5	5
43337		1	1		9	9		11	11		1	1
43340		10	10		15	15		9	9		3	3
43341		10	10		7	7		12	12		3	3
43342		1	1		12	12		3	3			
43345		7	7		6	6		6	6			
43350		2	2		10	10						
43351	125	10	135	271	24	295	268	18	286	54	5	59
43356		12	12		14	14		21	21			
43359		1	1		2	2						
43407		1	1									
43413		1	1		2	2		1	1			
43420	602	5	607	1456	12	1468	1275	13	1288	229		229
43451		1	1		4	4		4	4			
43462		11	11		11	11		16	16		1	1
43512		14	14		23	23		15	15		3	3
43516					1	1						
43526		56	56		78	78		62	62		9	9
43529		6	6		3	3		7	7			
43556		11	11		19	19		21	21		7	7

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43701	1073	46	1119	2688	79	2767	2313	64	2377	412	12	424
43711		1	1									
43713	67	10	77	181	20	201	186	9	195	33	4	37
43717					2	2		2	2			
43718		18	18		29	29		10	10		2	2
43719		17	17		37	37		15	15			
43720		2	2									
43721					1	1						
43722		1	1		3	3		3	3		1	1
43723	64	10	74	114	28	142	98	9	107	9	4	13
43724	1	20	21	2	29	31	1	23	24		5	5
43725	320	6	326	701	13	714	623	13	636	105	6	111
43727		4	4		6	6		4	4		2	2
43728		11	11		22	22		12	12		5	5
43730		17	17		48	48		21	21		2	2
43731		36	36		83	83		56	56		7	7
43732		5	5		10	10		4	4		1	1
43733		1	1		2	2		1	1			
43734		5	5		14	14		7	7		1	1
43735		4	4		9	9		3	3		2	2
43736		1	1		2	2		1	1			
43738		2	2		4	4		3	3			
43739		5	5		6	6		7	7			
43740		1	1		2	2		3	3			
43746		4	4		6	6		5	5		1	1
43749		6	6		2	2		3	3		1	1
43754					2	2						
43755		1	1		5	5		1	1			
43756		44	44		67	67		45	45		5	5
43758		17	17		42	42		26	26		6	6
43759		3	3		9	9		6	6			
43760					5	5		1	1		1	1
43761								1	1			

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43762		2	2		4	4		7	7		3	3
43764		61	61		116	116		90	90		9	9
43766		5	5		19	19		15	15		4	4
43767					2	2		2	2			
43768		2	2		4	4		1	1			
43771		8	8		9	9		13	13		2	2
43772		1	1		7	7		9	9		1	1
43773		14	14		22	22		10	10		3	3
43777	6	31	37	9	76	85	19	43	62	3	2	5
43778		1	1		3	3		2	2			
43779					1	1		1	1			
43780		5	5		6	6		4	4		3	3
43782		2	2		11	11		14	14		3	3
43783		14	14		34	34		17	17			
43787		22	22		30	30		32	32		5	5
43788		2	2		3	3		2	2		3	3
43791		2	2					1	1		1	1
43793					1	1		1	1			
43802		3	3		4	4		6	6		1	1
43804		8	8		4	4		8	8		2	2
43811		1	1		10	10		2	2			
43812	316	14	330	743	27	770	668	13	681	71		71
43821		24	24		38	38	1	40	41		3	3
43822		34	34		29	29		32	32		9	9
43824		7	7		12	12		3	3			
43828					1	1						
43830	1	32	33	7	54	61	11	68	79	1	10	11
43832		67	67		68	68	3	34	37	2	6	8
43836		2	2		3	3						
43837		11	11		23	23		24	24		1	1
43840		3	3		5	5		3	3		2	2
43842		2	2					1	1			
43843		1	1		1	1						

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43844		15	15		24	24		15	15		1	1
43845		49	49		49	49		14	14		2	2
43901		29	29		41	41		28	28		14	14
43903		21	21		45	45		31	31		3	3
43905		1	1		6	6		1	1			
43906		111	111		196	196		85	85		15	15
43907		58	58		133	133		90	90		21	21
43908		20	20		30	30		19	19		2	2
43909					1	1						
43910		16	16		35	35		28	28		1	1
43912	116	14	130	262	28	290	214	11	225	35	1	36
43913		32	32		42	42		18	18		13	13
43915		3	3		9	9		5	5			
43917		35	35		36	36		41	41		6	6
43920	525	34	559	1261	87	1348	1011	56	1067	181	5	186
43925		2	2		2	2		2	2			
43926		10	10		12	12		7	7		4	4
43928		1	1		3	3						
43930		6	6		5	5		5	5		1	1
43931		1	1		4	4		1	1			
43932		3	3		14	14		12	12			
43933		6	6		11	11		1	1			
43934	9	1	10	7	1	8	13		13	1		1
43935	265	15	280	468	42	510	414	7	421	72	1	73
43938		104	104		124	124	2	120	122	1	20	21
43939		4	4		9	9		7	7			
43940		5	5		12	12		1	1			
43942		27	27		35	35		13	13		2	2
43943		28	28		41	41		45	45		6	6
43944		13	13		29	29		26	26		6	6
43945		37	37		57	57		39	39		4	4
43946		8	8		10	10		8	8			
43947	96	9	105	154	14	168	138	7	145	34	1	35

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
43948		8	8		23	23		13	13		2	2
43950		33	33		41	41		28	28		2	2
43951		2	2		5	5		3	3			
43952	512	67	579	1269	112	1381	1191	102	1293	208	20	228
43953	61	67	128	140	172	312	191	131	322	35	26	61
43961		3	3		4	4						
43963		10	10		19	19		21	21		5	5
43964	133	27	160	309	52	361	257	38	295	28	7	35
43968		100	100		170	170		182	182		38	38
43970		1	1		1	1		1	1			
43971		21	21		29	29		25	25		2	2
43972		4	4		9	9		1	1			
43973		14	14		11	11		10	10		2	2
43974					1	1		3	3			
43976		11	11		18	18		18	18		4	4
43977		18	18		19	19		14	14		2	2
43981								2	2			
43983		5	5		4	4		6	6		1	1
43985		6	6		7	7		7	7			
43986		19	19		33	33		34	34		6	6
43988		27	27		31	31		43	43		6	6
44276					2	2		2	2			
44287		1	1		1	1		3	3			
44427		2	2		3	3		3	3			
44432		7	7		19	19		9	9		3	3
44601				3		3	1		1			
44606		26	26		53	53		62	62		5	5
44608		1	1		1	1		1	1			
44610		1	1		7	7		3	3			
44611		3	3		10	10		5	5		1	1
44612		49	49		96	96		75	75		17	17
44615		70	70		126	126		97	97		15	15
44618		1	1		3	3		3	3			

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
44620		3	3		6	6		9	9		2	2
44621		89	89		170	170		135	135		23	23
44622		24	24		65	65		43	43		6	6
44624		8	8		9	9		5	5		1	1
44626	19	19	38	48	31	79	53	43	96	9	2	11
44627		3	3		6	6		6	6		3	3
44628		7	7		6	6		7	7			
44629		16	16		34	34		29	29		3	3
44633		3	3		17	17		16	16		4	4
44637		21	21		35	35		32	32		4	4
44638		10	10		20	20		19	19		4	4
44641	306	2	308	653	4	657	668	5	673	98		98
44643		41	41		60	60		47	47		5	5
44644		34	34		38	38		41	41		8	8
44646	9		9	13	1	14	25	1	26	10		10
44652	6		6	9		9	4		4	3		3
44653		16	16		17	17		30	30		2	2
44654		80	80		147	147		131	131		11	11
44656		33	33		57	57		71	71		19	19
44657	97	26	123	253	32	285	197	39	236	30	2	32
44659					3	3		2	2		1	1
44661		3	3		5	5		9	9		2	2
44662	31	3	34	29	3	32	58	3	61	7	1	8
44663	361	107	468	770	270	1040	735	226	961	132	48	180
44667		26	26		48	48		34	34		1	1
44669		2	2		4	4		3	3		2	2
44670		7	7		7	7		11	11			
44671		4	4		12	12		6	6			
44675		3	3		22	22		20	20		1	1
44676		39	39		57	57		59	59		2	2
44677		21	21		31	31		31	31		2	2
44678					3	3		3	3			
44680		33	33		88	88		54	54		5	5

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ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
44681		21	21		34	34		30	30		4	4
44682		16	16		29	29		18	18		3	3
44683		154	154		269	269		247	247		31	31
44688		55	55		66	66		83	83		8	8
44689		3	3		6	6		9	9		6	6
44691	490	85	575	991	201	1192	839	165	1004	118	21	139
44695		22	22		35	35		32	32		4	4
44697		1	1		5	5		8	8		1	1
44699		3	3		6	6		6	6		1	1
44702	27		27	45		45	47		47	4		4
44703	758	1	759	1543	4	1547	1385	3	1388	205		205
44704	287		287	728	1	729	642	3	645	126		126
44705	937	3	940	2538	9	2547	2056	4	2060	333	3	336
44706	693	4	697	1311	6	1317	1264	5	1269	178	3	181
44707	487	4	491	1081	13	1094	922	6	928	124		124
44708	792	1	793	1859	10	1869	1686	5	1691	301	1	302
44709	574	2	576	1399	5	1404	1187	2	1189	211	2	213
44710	480		480	1031	6	1037	795	5	800	141	1	142
44714	369		369	956	3	959	732	2	734	119		119
44718	176	1	177	455	2	457	461	2	463	74		74
44720	316	2	318	869	9	878	735	6	741	122		122
44721	126		126	325	1	326	291	6	297	54		54
44730	80	18	98	158	34	192	125	21	146	28	3	31
44802		5	5		10	10		5	5			
44805		9	9		7	7		10	10			
44807		15	15		26	26		22	22		3	3
44809		1	1		5	5		2	2		1	1
44813		18	18		27	27		26	26		5	5
44815		5	5		16	16		4	4			
44818		24	24		21	21		16	16		5	5
44820	335	35	370	699	59	758	568	47	615	89	3	92
44823		1	1									
44825		3	3		3	3		8	8		1	1

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
44827		7	7		7	7		12	12			
44830	446	13	459	1239	16	1255	1032	3	1035	197		197
44833		24	24		39	39		29	29		1	1
44836		1	1									
44837		11	11		22	22		14	14			
44840		1	1		3	3		2	2		1	1
44841		3	3		6	6						
44842		2	2		2	2		1	1			
44844		5	5		6	6		2	2			
44849		6	6		24	24		22	22		5	5
44850	1		1	4		4	2		2	1		1
44853		9	9		8	8		7	7		1	1
44856		3	3		1	1					1	1
44859					1	1						
44861		1	1		4	4		4	4			
44865	2	7	9	2	7	9	8	8	16	1	1	2
44874		7	7		6	6		9	9			
44875	1	19	20	5	15	20	3	23	26	1	6	7
44878		6	6		1	1		4	4			
44881		1	1		2	2		2	2		2	2
44882		1	1		3	3						
44883	444	23	467	948	32	980	866	21	887	109	1	110
44887		9	9		11	11		10	10		2	2
44890	185	5	190	328	2	330	377	11	388	32		32
44903		1	1		1	1		2	2			
44904		34	34		77	77		68	68		9	9
45101		39	39		72	72		53	53		13	13
45115		1	1									
45123		3	3		8	8		5	5			
45133	145	40	185	331	57	388	289	72	361	47	6	53
45135		4	4		1	1		1	1			
45142		1	1		5	5		5	5		1	1
45144		48	48		111	111		123	123		24	24

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
45154		1	1									
45155					3	3						
45168		1	1		1	1		1	1			
45171		40	40		89	89		74	74		16	16
45362					4	4		6	6		1	1
45390		44	44		87	87		83	83		8	8
45601	799	117	916	1961	199	2160	1623	253	1876	289	50	339
45612		11	11		29	29		38	38		1	1
45613		27	27		61	61		37	37		9	9
45614		44	44		58	58		49	49		8	8
45616		7	7		15	15		21	21		2	2
45617		4	4		10	10		17	17		3	3
45618					1	1						
45619		15	15		47	47		23	23		8	8
45620		6	6		12	12		9	9		1	1
45621		4	4		3	3		3	3			
45622		3	3		4	4		2	2		2	2
45623		6	6		9	9		9	9		2	2
45628		3	3		14	14		14	14		3	3
45629		23	23		45	45		20	20		6	6
45630					4	4		5	5		1	1
45631	83	51	134	203	61	264	184	69	253	27	17	44
45634		23	23		34	34		20	20		7	7
45638	296	59	355	741	102	843	587	49	636	91	17	108
45640		26	26		66	66		38	38		8	8
45644		1	1		3	3		5	5		1	1
45645		6	6		5	5		7	7		2	2
45646		6	6		4	4		9	9		3	3
45647		18	18		38	38		43	43		3	3
45648		89	89		188	188		236	236		26	26
45651		51	51		92	92		39	39		8	8
45652		23	23		37	37		60	60		1	1
45653		38	38		70	70		59	59		9	9

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ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
45654		8	8		16	16		7	7		4	4
45656		29	29		118	118		52	52		10	10
45657		16	16		20	20		24	24		4	4
45658		2	2									
45659		6	6		10	10		5	5		3	3
45660		68	68		127	127		161	161		22	22
45661		52	52		126	126		101	101		27	27
45662	793	54	847	1709	63	1772	1499	91	1590	270	10	280
45663	89	44	133	169	78	247	164	82	246	28	11	39
45669		20	20		21	21		36	36		7	7
45671		3	3					2	2			
45672		5	5		12	12		16	16		1	1
45673		10	10		16	16		11	11		5	5
45674		1	1		5	5		6	6			
45679		33	33		64	64		58	58		18	18
45680	53	19	72	105	76	181	92	43	135	9	4	13
45681					2	2		5	5			
45682		16	16		22	22		18	18		2	2
45684		17	17		23	23		33	33		3	3
45685		7	7		19	19		7	7		1	1
45686		18	18		33	33		37	37		3	3
45687					3	3		1	1			
45690	96	91	187	222	161	383	221	133	354	40	39	79
45692		75	75		155	155		89	89		22	22
45693		104	104		132	132		144	144		25	25
45694	124	30	154	352	95	447	275	36	311	47	10	57
45695		1	1		4	4		3	3		1	1
45697		39	39		78	78		46	46		8	8
45698		3	3		4	4		5	5			
45701	302	64	366	558	157	715	532	115	647	96	13	109
45710		18	18		50	50		51	51		7	7
45711		2	2		9	9		3	3			
45714		101	101		180	180		191	191			

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OCC-INT-02-001 Attachment 1

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
45715		22	22		25	25		34	34			
45716	12		12	22		22	31		31	5		5
45719	31		31	76		76	72		72	18		18
45723		19	19		64	64		42	42		3	3
45724		14	14		14	14		19	19			
45727		3	3		3	3		3	3			
45729		9	9		18	18		27	27			
45732	3	23	26	1	59	60	5	36	41		1	1
45735		13	13		26	26		17	17		2	2
45740		7	7		9	9		11	11			
45741		4	4		7	7		11	11			
45742		17	17		28	28		47	47			
45743		6	6		22	22		31	31		4	4
45744		10	10		24	24		28	28			
45745		3	3		10	10		14	14			
45746		3	3		9	9		8	8			
45750	375	77	452	711	145	856	640	107	747	105		105
45760		47	47		64	64		52	52		11	11
45761		17	17	2	27	29		18	18	1		1
45764	199	27	226	374	69	443	286	49	335	59	4	63
45766		10	10		23	23		12	12			
45767		15	15		27	27		29	29			
45768		9	9		25	25		12	12			
45769		63	63		102	102		72	72		18	18
45770					7	7		8	8		3	3
45771		26	26		64	64		31	31		8	8
45772		13	13		39	39		16	16		6	6
45773		1	1		3	3		1	1			
45775		5	5		20	20		13	13		2	2
45776		4	4		25	25		14	14		2	2
45778		6	6		18	18		16	16			
45779		5	5		7	7		11	11		4	4
45780	81		81	161		161	190		190	26		26

Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
45782					6	6		2	2			
45784		23	23		37	37		44	44			
45786		13	13		22	22		32	32			
45788		2	2		5	5		4	4			
45801	997	12	1009	1954	21	1975	1736	24	1760	248	2	250
45804	808	8	816	1882	19	1901	1659	17	1676	308	2	310
45805	650	12	662	1609	18	1627	1575	18	1593	270	1	271
45806	4	76	80	17	183	200	13	135	148	1	15	16
45807	99	7	106	249	16	265	272	13	285	37	1	38
45808		4	4		9	9		8	8		2	2
45809		3	3		1	1		6	6			
45810		58	58		101	101		109	109		9	9
45812		20	20		32	32		30	30		7	7
45813		26	26		42	42		34	34		4	4
45814		9	9		13	13		11	11		2	2
45816					2	2		1	1			
45817		16	16		38	38		20	20		7	7
45819					6	6		1	1			
45820		7	7		15	15		14	14		1	1
45821		2	2		7	7		9	9		1	1
45827		4	4		6	6		11	11		2	2
45830		34	34		47	47		29	29		2	2
45831		12	12		14	14		28	28		7	7
45832		15	15		27	27		17	17		2	2
45833		98	98		189	189		151	151		21	21
45835		3	3		1	1		3	3			
45836		7	7		23	23		22	22		3	3
45840	717	108	825	1674	264	1938	1501	174	1675	236	34	270
45841		2	2		11	11		2	2			
45843		20	20		47	47		49	49		14	14
45844		6	6		3	3		3	3		1	1
45849		12	12		8	8		11	11		3	3
45850		21	21		30	30		22	22		4	4

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Count of BILL_ACCT_NB	2020 (March-Dec)			2021			2022			2023 (Jan-Feb)		
ZIP_CODE	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total	AMI	NON-AMI	Total
45851		4	4					2	2			
45853		4	4		11	11		4	4			
45854		5	5		11	11		8	8		1	1
45855		2	2					5	5		1	1
45856		28	28		65	65		60	60		8	8
45858		24	24		54	54		26	26		9	9
45859		10	10		19	19		18	18		1	1
45861		7	7		7	7		3	3		2	2
45863		7	7		9	9		12	12		2	2
45867		14	14		18	18		14	14		2	2
45868		3	3		8	8		6	6			
45872		51	51		91	91		76	76		9	9
45873		19	19		22	22		39	39		4	4
45874		1	1		2	2		3	3			
45875		66	66		96	96		95	95		8	8
45876		1	1		10	10		3	3			
45877		8	8		10	10		14	14		3	3
45879		53	53		77	77		77	77		6	6
45880		22	22		39	39		25	25		4	4
45881		5	5		25	25		16	16		4	4
45886		6	6		7	7		3	3		3	3
45887		52	52		75	75		82	82		11	11
45889		5	5		6	6		12	12		1	1
45890		11	11		6	6		5	5		1	1
45891	288	5	293	647	15	662	584	14	598	83	3	86
45893		3	3	3	1	4		1	1	1	1	2
45894					4	4		1	1		1	1
45895		6	6		4	4		1	1			
45897		1	1		3	3		2	2		1	1
45898		1	1					1	1		1	1
Grand Total	63,568	7,935	71,503	148,368	15,110	163,478	133,581	12,490	146,071	22,910	1,977	24,887

THE CONVERSATION

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Low-income residents are among those most likely to lose cooling in their homes because they can't pay their bills.
Solidcolours/iStock/Getty Images Plus

America faces a power disconnection crisis amid rising heat: In 31 states, utilities can shut off electricity for nonpayment in a heat wave

Published: July 5, 2023 8.24am EDT •Updated: July 7, 2023 9.29am EDT

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Millions of Americans have been sweltering through heat waves in recent weeks, and U.S. forecasters warn of a hot summer ahead.

Globally, 2023 saw the warmest June on record, according to the European Union's climate change service. That heat continued into July, with some of the hottest global daily temperatures on satellite record, and possibly the hottest.

For people who struggle to afford air conditioning, the rising need for cooling is a growing crisis.

An alarming number of Americans risk losing access to utility services because they can't pay their bills. Energy utility providers shut off electricity to at least 3 million customers in 2022 who had missed a bill payment. Over 30% of these disconnections happened in the three summer months, during a year that was the fifth hottest on record.

In some cases, the loss of service lasted for just a few hours. But in others, people went without electricity for days or weeks while scrambling to find enough money to restore service, often only to face disconnection again.

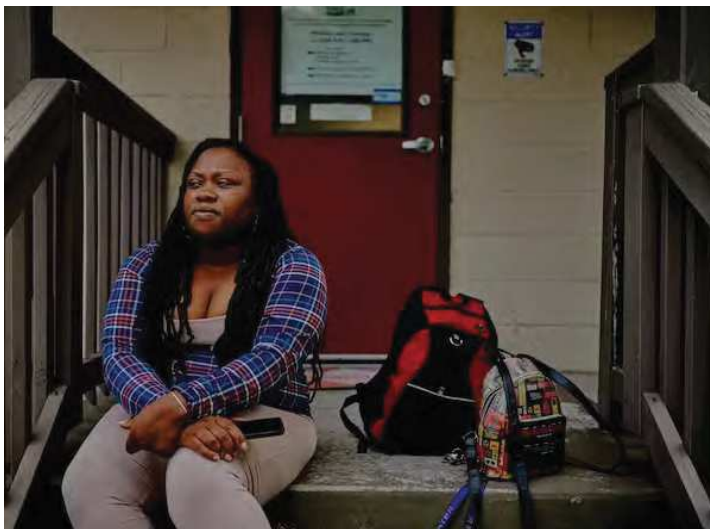
As researchers who study energy justice and energy insecurity, we believe the United States is in the midst of a disconnection crisis. We started tracking these disconnections utility by utility around the country, and we believe that the crisis will only get worse as the impacts of climate change become more widespread and more severe. In our view, it is time government agencies and utilities start treating household energy security as a national priority.

1 in 4 households face energy insecurity

Americans tend to think about the loss of electricity as something infrequent and temporary. For most, it is a rare inconvenience stemming from a heat wave or storm.

But for millions of U.S. households, the risk of losing power is a constant concern. According to the most recent data from the U.S. Energy Information Administration, 1 in 4 American households experience some form of energy insecurity each year, with no appreciable improvement over the past decade.

For many low-income households, the risk of a power shut-off reoccurs month after month. In a recent study, we found that over the course of a single year, half of all households whose power was disconnected dealt with disconnections multiple times as they struggled to pay their bills.



A woman sits outside the NeedLink Nashville offices after filling out an application to avoid losing electricity in 2022. William DeShazer for The Washington Post via Getty Images

Energy insecurity like this is especially common among low-income Americans, people of color, families with young children, individuals who rely on electronic medical devices or those living in poor housing conditions. During the first year of the COVID-19 pandemic, we found that Black and Hispanic households were three and four times, respectively, more likely to lose service than white households.

Along with existing financial constraints, people are facing rising electricity rates in many areas, rising inflation and higher temperatures that require cooling. Some also face a history of redlining and poor city planning that has concentrated certain populations in less efficient homes. Taken together, the crisis is apparent.

Coping strategies can put health at risk

We have found that over half of all low-income households engage in some coping strategies, and most of them find they need multiple strategies at once.

They might leave the air conditioner off in summer, allowing the heat to reach uncomfortable and potentially unsafe temperatures to reduce costs. Or they might forgo food or medicine to pay their energy bills, or strategically pay down one bill rather than another, known as “bill balancing.” Others turn to payday loans that might help temporarily but ultimately put them in deeper debt. In our research, we have found that the most common coping strategies are also the most risky.

Coping strategies when power bills get too high

A survey of more than 5,000 Americans living within 200% of the federal poverty line in 2020-21 found many took on debt or faced dangerous temperatures to afford their power bills.

Accrue debt	27%
Risky temperature choices	26%
Bill balancing	18%
Forgo expenses	17%
Government aid	11%
Help from friends, family	10%
Utility assistance	6%
Formal loan	2%

Chart: The Conversation/CC-BY-ND • Source: Sanya Carley • [Get the data](#) • [Download image](#) • Created with [Datawrapper](#)

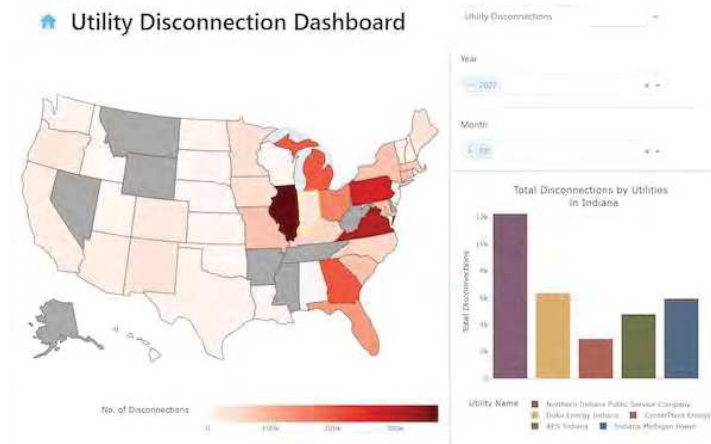
Once people fall behind on their bills, they are at risk of being disconnected by their utility providers.

The loss of critical energy services may mean that affected people cannot keep their homes cool – or warm during the winter months – or food refrigerated during any season. Shut-offs may mean that people with illnesses or disabilities cannot keep medicines refrigerated or medical devices charged. And during times of extreme cold or heat, the loss of energy utility services can have deadly consequences.

Where disconnection rates are highest

Our research team recently launched the Utility Disconnections Dashboard in which we track utility disconnections in all places where data is available.

In recent years, more states have required regulated utilities across the country to disclose the number of customers they disconnect. However, state regulations only apply to the utilities that they regulate. Public utilities and cooperatives, which serve over 20% of U.S. electricity customers, often aren't covered. That leaves massive gaps in understanding of the full magnitude of the problem.



The Utility Disconnections Dashboard shows the number and rate of disconnections by utility in each state. Energy Justice Lab, CC BY-ND

The data we do have reveals that disconnection rates soar during the summer months and are typically highest in the Southeast – the same states that were baking under a heat dome in June and July 2023.

Places with particularly high disconnection rates include Alabama, where the city of Dothan's municipal utility has disconnected an average of 5% of its customers, and Florida, where the city of Tallahassee has a disconnection rate of over 4%.

Large investor-owned utilities in Florida, Georgia, South Carolina and Indiana also top the charts in disconnections, with average rates near 1%.

Only 19 states restrict summer shut-offs

State public utility commissions place certain restrictions on the circumstances when utilities can disconnect customers, but summer heat is often overlooked.

All but a handful of states limit utilities from shutting off customers during winter months or on extremely cold days. Most have at least some medical exemptions.

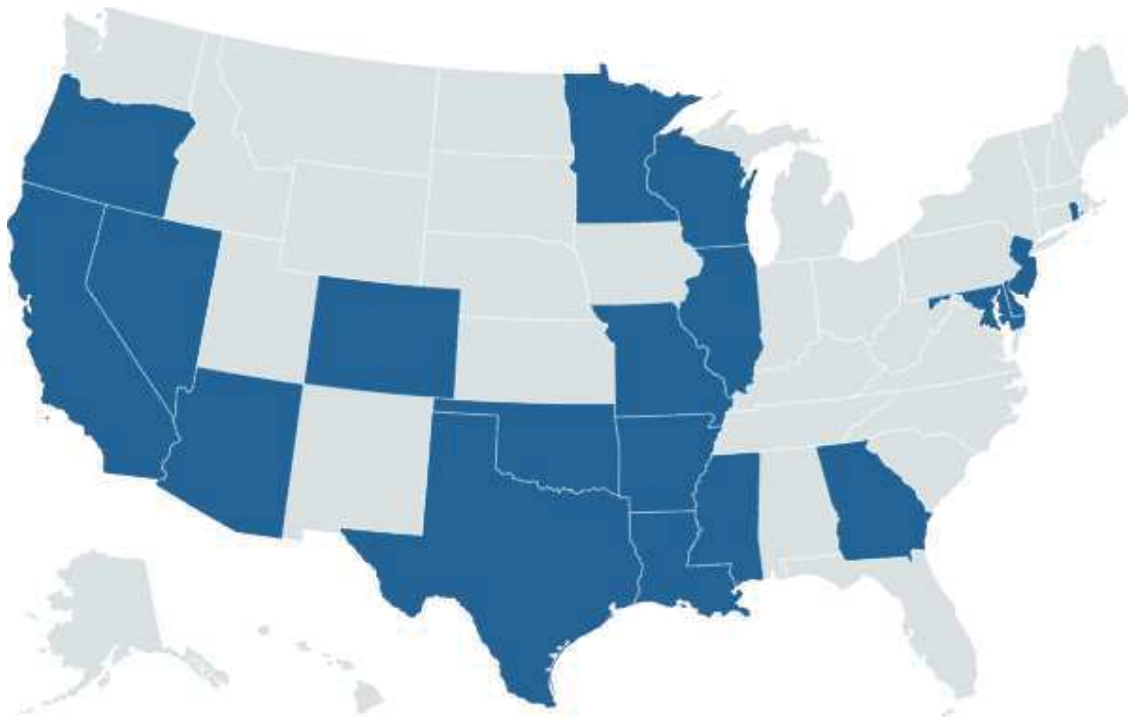
Yet, the majority of states do not place any limits on utility disconnections during summer months or on very hot days. Only 19 states have such summer protections, which typically take the form of designating time periods or temperatures when customers cannot be disconnected from their service. We believe this is untenable in an era of climate change, as more parts of the country will increasingly experience excessive-heat days.

States with rules limiting disconnections during high heat

Only 19 states have mandatory limits on utility disconnections during high heat to protect consumers from losing electricity service due to nonpayment, as of July 1, 2023.

Heat-based protections

No Yes



A Washington state law goes into effect on July 23, 2023.

Map: The Conversation/CC-BY-ND • Source: [Utility Disconnections Dashboard](#) • [Get the data](#) • [Download image](#) • Created with [Datawrapper](#)

These state-level policies provide a baseline of protection. We learned during the COVID-19 pandemic that moratoriums that prohibit utility disconnections can alleviate energy insecurity by establishing a strong mandate against disconnections.

But these policies are highly variable across the country and particularly insufficient during hot summer months. Moreover, customer protections can be difficult for people to find and understand, since the language can be overly convoluted and confusing, placing additional an burden on already vulnerable Americans to discover for themselves how they can avoid losing service.

Better rules and a new mindset on right to energy

As we see it, the U.S. needs more robust customer protections, with states, if not the federal government, mandating better disclosure of when and where disconnections occur to identify any systemic biases.

Most of all, we believe Americans need a collective change in mindset about energy access. That should start with a principle that all people should have access to critical energy services and that utilities should only shut off service to customers as a last resort, especially during health-compromising weather events.

The country cannot wait for deadly heat waves to prove how important it is to protect American households.

This article, originally published July 5, 2023, was updated July 7 with the June 2023 heat record and more July heat.

**NATIONAL ENERGY ASSISTANCE
DIRECTORS' ASSOCIATION**

**2011 NATIONAL ENERGY ASSISTANCE SURVEY
SUMMARY REPORT**

Final Report
November 2011

The National Energy Assistance Directors' Association

The National Energy Assistance Directors' Association (NEADA) represents the state directors of the Low Income Home Energy Assistance Program (LIHEAP). NEADA is a nonprofit educational and policy organization based in Washington, DC. Its mission is to support the delivery of LIHEAP services by state agencies and programs.

This report has been prepared by APPRISE for NEADA under Grant No. 90XP0249 through the Administration for Children and Families (ACF), U.S. Department of Health and Human Services. The statements, findings, conclusions, and recommendations do not necessarily reflect the views of ACF.

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Acknowledgements

NEADA would like to thank the many individuals and organizations that provided assistance and time in developing this study and its findings. In particular, we would like to thank Jackie Berger, Matthew Swartz, Jennifer Frenett, and Colleen Driscoll of APPRISE for conducting the research and preparing the study report. We would like to thank Lynne Snyder of NEADA for guidance on questions related to health issues. We would like to thank the many people who took time to review and comment on the draft report.

The study would not have been possible without the participation of the directors and staff at the state LIHEAP offices in:

California	Iowa	Montana	New York
Connecticut	Maine	North Carolina	Ohio
Delaware	Minnesota	New Mexico	Pennsylvania
Georgia			

Mark Wolfe
Executive Director
National Energy Assistance Directors' Association

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Executive Summary

The National Energy Assistance Directors' Association (NEADA), representing the state LIHEAP directors, received a grant through the Administration for Children and Families (ACF), U.S. Department of Health and Human Services to update the information about LIHEAP-recipient households that was collected in the 2003, 2005, 2008 and 2009 NEA Surveys. This survey documented changes in the affordability of energy bills, the need for LIHEAP, and the choices that low-income households make when faced with unaffordable energy bills.

The 2011 Survey included 13 states with an oversample in Connecticut, as in the 2009 Survey. Stratified samples of fiscal year 2011 LIHEAP recipients were chosen from each of the state LIHEAP databases. This report presents the findings from the 2011 NEA Survey and provides comparisons to the 2003, 2008, and 2009 NEA Surveys. The survey and report were prepared for NEADA by APPRISE.

During the period of study, low-income households across the country continued to face a difficult economic climate and continued to deal with high energy costs. The survey substantiated these issues – showing that 35 percent were unemployed at some point during the year and that 52 percent reported it was more difficult to pay energy bills than it was the previous year.

LIHEAP Recipient Households

The study confirmed that LIHEAP recipient households are likely to be vulnerable to temperature extremes.

- 40 percent had a senior in the household aged 60 or older.
- 42 percent had a disabled household member.
- 41 percent had a child 18 or younger.
- 89 percent had at least one vulnerable household member.

The study also provided information on challenges that these households faced.

- 35 percent were unemployed at some point during the previous year.
- 72 percent had a serious medical condition.
- 26 percent used medical equipment that requires electricity.

Energy Costs

LIHEAP recipients reported that they faced high energy costs.

- 45 percent reported that their energy bills were more than \$2,000 in the past year.

- Pre-LIHEAP energy burden averaged 16 percent and post-LIHEAP energy burden averaged 12 percent for these households, compared to 7 percent for all households in the U.S. and 4 percent for non low-income households in the U.S.¹
- 52 percent said that energy bills were more difficult to pay than in the previous year.
- 48 percent of those who said that it was more difficult to pay their energy bills reported that the main reason was their financial situation.

LIHEAP benefits decreased since the previous year due to the smaller appropriation in FY 2011. Mean heating benefits were \$429 in FY 2011, compared to \$483 in FY 2009.

Responses to High Energy Costs

Households reported that they took several actions to make ends meet.

- 39 percent closed off part of their home.
- 23 percent kept their home at a temperature that was unsafe or unhealthy.
- 21 percent left their home for part of the day.
- 33 percent used their kitchen stove or oven to provide heat.

Inability to Pay Energy Bills

Many LIHEAP recipients were unable to pay their energy bills.

- 49 percent skipped paying or paid less than their entire home energy bill.
- 37 percent received a notice or threat to disconnect or discontinue their electricity or home heating fuel.
- 11 percent had their electric or natural gas service shut off in the past year due to nonpayment.
- 24 percent were unable to use their main source of heat in the past year because their fuel was shut off, they could not pay for fuel delivery, or their heating system was broken and they could not afford to fix it.
- 17 percent were unable to use their air conditioner in the past year because their electricity was shut off or their air conditioner was broken and they could not afford to fix it.

Housing and Financial Problems

Many LIHEAP recipients had problems paying for housing in the past five years, due at least partly to their energy bills.

- 31 percent did not make their full mortgage or rent payment.
- 6 percent were evicted from their home or apartment.
- 4 percent had a foreclosure on their mortgage.
- 14 percent moved in with friends or family.
- 4 percent moved into a shelter or were homeless.

¹ Source: 2008 LIHEAP Notebook.

- 13 percent got a payday loan in the past five years.

Medical and Health Problems

Many of the LIHEAP recipients faced significant medical and health problems in the past five years, partly as a result of high energy costs.

- 24 percent went without food for at least one day.
- 37 percent went without medical or dental care.
- 34 percent did not fill a prescription or took less than the full dose of a prescribed medication.
- 19 percent had someone in the home become sick because the home was too cold.

The Need for LIHEAP

Households reported enormous challenges despite the fact that they received LIHEAP. However, they reported that LIHEAP was extremely important.

- 65 percent of those who did not keep their home at unsafe or unhealthy temperatures said they would have done so if LIHEAP had not been available.
- 63 percent of those who did not have their electricity or home heating fuel discontinued said that they would have if it had not been for LIHEAP.

It is clear that many of these households will continue to need LIHEAP to meet their energy and other essential needs.

I. Introduction

The National Energy Assistance Directors' Association (NEADA), representing the state LIHEAP directors, received a grant through the Administration for Children and Families (ACF), U.S. Department of Health and Human Services to update the information about LIHEAP-recipient households that was collected in the 2003, 2005, 2008, and 2009 NEA Surveys. This survey documented changes in the affordability of energy bills, the need for LIHEAP, and the choices that low-income households make when faced with unaffordable energy bills.

The 2011 NEA Survey selected a new sample of 2011 LIHEAP recipients to document changes in the need for LIHEAP and changes in the choices that low-income households make when faced with unaffordable energy bills. This report presents the findings from the 2011 NEA Survey and provides comparisons to the 2003, 2008 and 2009 NEA Surveys. The survey and report were prepared for NEADA by APPRISE.

A. Low Income Home Energy Assistance Program (LIHEAP)

The Low Income Home Energy Assistance Program (LIHEAP) is administered by the U.S. Department of Health and Human Services (HHS). The purpose of LIHEAP is “to assist low-income households, particularly those with the lowest incomes, that pay a high proportion of household income for home energy, primarily in meeting their immediate home energy needs.” The LIHEAP statute defines home energy as “a source of heating or cooling in residential dwellings.”²

Federal dollars for LIHEAP are allocated by the U.S. Department of Health and Human Services to the grantees (i.e., the 50 states, District of Columbia, 128 tribes and tribal organizations, and five insular areas) as a block grant. Program funds are distributed by a formula, which is weighted towards relative cold-weather conditions.

B. 2011 National Energy Assistance Survey

The 2011 NEA Survey aimed to update the information about LIHEAP-recipient households that was collected in the 2003, 2008, and 2009 NEA Surveys. Stratified samples of 2011 LIHEAP recipients were selected to collect new information about the consequences of high energy bills for low-income households. The 2011 National Energy Assistance Survey collected the following information from LIHEAP-recipient households:

- Demographic, energy expenditure, and income information
- Healthy home behaviors

² The statutory intent of LIHEAP is to reduce home heating and cooling costs for low-income households. However, information on total residential energy costs is more accessible and more apparent to LIHEAP-recipient respondents. Moreover, any reduction in home heating and cooling costs leads to a direct reduction in total residential energy costs. Therefore, this report addresses total residential energy costs.

- History of LIHEAP participation
- Constructive actions taken to meet energy expenses
- Signs of unaffordable energy bills
- Health and safety consequences of unaffordable energy bills
- Effects of unaffordable energy bills on housing
- Changes in financial situation and affordability of home energy bills
- Impact and importance of LIHEAP benefits for recipient households

The 2011 Survey included the 13 states that were included in the 2009 Survey and a larger sample of CT LIHEAP recipients, as a result of additional funding that was allocated for a special study in CT.

C. Organization of the Report

This report has four sections that follow this introduction.

- *Section II: Survey Methodology:* Presents the methodology used.
- *Section III: LIHEAP Recipients:* Presents demographic and income information LIHEAP-recipient households that completed the 2011 NEA Survey.
- *Section IV: Problems Faced in Meeting Energy Needs:* Presents information about actions that LIHEAP-recipient households take to meet their energy needs, household necessities, and health and wellness in the face of significant financial constraints.
- *Section V: Conclusion:* Presents a summary of the key findings in this report.

II. Survey Methodology

This section summarizes the methodology for the 2011 NEA Survey.

A. Survey Implementation

A survey advance letter was sent to the sample of LIHEAP recipients. This letter announced the survey, explained the purpose of the survey, and gave potential respondents the option to call the phone center to complete the survey.

Telephone interviews were conducted between May 2, 2011 and July 3, 2011. During this time period, 1,768 interviews were completed.

B. Sample Selection and Response Rates

LIHEAP recipients were selected from each of the 13 states chosen to participate in the survey. Because of a special congressional earmark for Connecticut, a special study was conducted for Connecticut.

Table II-1 displays the number of interviews completed by state. The response rate ranged from 41 percent in New York to 69 percent in New Mexico.

Table II-1
Number of Completed Interviews by State

State	Total Selected	Completed Interviews	Response Rate
California	260	103	48%
Connecticut	1,290	495	48%
Delaware	220	100	63%
Georgia	220	105	59%
Iowa	220	102	65%
Maine	220	133	68%
Minnesota	220	105	60%
Montana	220	102	62%
New Mexico	220	102	69%
New York	450	101	41%
North Carolina	270	97	60%
Ohio	220	111	67%
Pennsylvania	220	112	62%
TOTAL	4,250	1,768	56%

III. LIHEAP Recipient Households

The 2011 National Energy Assistance Survey included a series of questions about household demographics.

Table III-1 displays information on the presence of vulnerable household members. The table shows that 40 percent have a senior in the home, 42 percent have a disabled household member, 41 percent have a child age 18 or younger, and 21 percent have a child age five or younger. Eight-nine percent had at least one vulnerable member (elderly, disabled, or child).

Table III-1
Vulnerable Groups

	Senior ≥ 60	Disabled	Child ≤ 18	Young Child ≤ 5	Single Parent
Yes	40%	42%	41%	21%	15%
No	59%	56%	58%	78%	85%
Don't Know/ Refused	2%	2%	2%	2%	--

Table III-2 displays the annual household income distribution for LIHEAP-recipient households. The table shows that 36 percent have income of less than or equal to \$10,000 and only two percent have income above \$40,000.

Table III-2
Annual Income

Annual Income	Percent of Respondents
$\leq \$ 10,000$	36%
\$ 10,001 - \$ 20,000	41%
\$ 20,001 - \$ 30,000	16%
\$ 30,001 - \$ 40,000	5%
More than \$ 40,000	2%
Don't Know	1%

Table III-3 shows that 19 percent had income at or below 50 percent of the poverty level and 61 percent had income at or below the poverty level. Only 11 percent had income above 150 percent of the poverty level.

**Table III-3
Poverty Level**

Poverty Level	Percent of Respondents
0%-50%	19%
51%-100%	42%
101%-125%	15%
126%-150%	13%
>150%	11%

Respondents were asked whether they had been unemployed at some time during the year. Table III-4 shows that 35 percent reported that they had been unemployed at some point during the past year. This compares to 31 percent in 2003, 29 percent in 2008, and 36 percent in 2009.

**Table III-4
Unemployed During the Year**

	2003	2008	2009	2011
Yes	31%	29%	36%	35%
No	69%	70%	63%	62%
Don't Know / Refused	0%	1%	1%	3%

Table III-5 displays the percent of respondents who were unemployed during the past year by vulnerable group. The table shows that households with children under 18 and non-vulnerable households were most likely to report that they had been unemployed. Fifty-three percent of households with children reported that they had been unemployed.

**Table III-5
Unemployed During the Year
By Vulnerable Group**

	Senior	Disabled	Child ≤18	Non-Vulnerable
Number of Respondents	705	738	722	195
Yes	17%	26%	53%	49%
No	81%	72%	46%	35%
Don't Know / Refused	2%	1%	1%	15%

IV. Problems Meeting Energy Needs

This section examines the financial challenges and difficult choices made by the LIHEAP recipients to manage their total residential energy costs.

A. Increased Utility Bills and Increased Need

Respondents were asked to report their annual energy costs. Table IV-1 shows that 45 percent of the respondents reported that their bills were over \$2,000.

Table IV-1
Annual Total Residential Energy Costs

Annual Energy Costs	Percent of Respondents
Less than \$500	2%
\$501 - \$1,000	8%
\$1,001 - \$1,500	10%
\$1,501 - \$2,000	12%
Over \$2,000	45%
Don't Know/Refused	22%

Table IV-2 displays the distribution of LIHEAP heating benefits in FY2008, FY2009 and FY2011. Twenty-eight percent received \$250 or less in FY2011, compared with 18 percent who received \$250 or less in FY2009.

Table IV-2
LIHEAP Heating Benefits Distribution

Benefit Amount	Percent Received		
	2008	2009	2011
Number of Respondents	1,256	1,828	1,667
≤ \$100	6%	<u>5%</u>	<u>7%</u>
\$101-\$250	<u>25%</u>	<u>13%</u>	<u>21%</u>
\$251-\$500	<u>39%</u>	45%	<u>43%</u>
\$501-\$750	<u>11%</u>	<u>21%</u>	<u>15%</u>
\$751-\$1,000	6%	7%	6%
≥ \$1,000	<u>3%</u>	6%	<u>5%</u>
Did Not Receive Heating Benefit	<u>9%</u>	4%	<u>3%</u>

Note: 2011 statistically significant differences at the 95% level from 2008 and 2009 are underlined.

Pre-LIHEAP energy burden was calculated by dividing the respondents' energy costs by their total household income and post-LIHEAP energy burden was calculated by subtracting LIHEAP benefits from energy costs and then dividing these net energy costs by total household income. Table IV-3 shows that LIHEAP benefits had a big impact on the households' energy burden. Prior to receiving LIHEAP, 22 percent of households had an energy burden higher than 20 percent. After receiving LIHEAP, 13 percent had an energy burden that was this high. Additionally, LIHEAP benefits increased the percentage with burdens below five percent from 9 percent of recipients to 26 percent.

Table IV-3
Total Residential Energy Burden

	Total Residential Energy Burden	
	Pre-LIHEAP	Post-LIHEAP
Number of Respondents	1,275	1,275
0-5%	9%	26%
6%-10%	32%	32%
11-15%	23%	20%
16-20%	13%	9%
21-25%	9%	5%
>25%	13%	8%

Respondents were asked whether they had a more or less difficult time paying their energy bills in the past year, as compared to the previous year. Table IV-4 shows that 52 percent said they had a more difficult time and 12 percent said they had a less difficult time.

Table IV-4
Change in Difficulty in Paying Energy Bills

Change in Difficulty in Paying Energy Bills	Percent of Respondents
More Difficult	52%
Same	31%
Less Difficult	12%
Don't Know/Refused	5%

Respondents who said that they had a more difficult time paying their energy bills were asked why it was more difficult. Table IV-5 shows that 48 percent said it was due to a worse financial situation and 42 percent said it was due to an increased energy bill.

Table IV-5
Reasons for Increased Difficulty in Paying Energy Bills

	Main Reason (Unprompted)
Number of Respondents	940
Lower Income/Lost Job/ Worse Economic Situation	48%
Increased Energy Bill	42%
Increased Other Bills	6%
Increased Medical Expenses	2%
Other	1%
Don't Know/Refused	1%

B. Signs of the Problem

Respondents were asked whether they reduced expenses for household necessities due to not having enough money to pay their energy bill during the past year. Table IV-6 compares responses to questions about signs of unaffordable energy bills for the 2003, 2008, 2009 and 2011 surveys. The table shows that approximately the same percentage of respondents faced these problems in all three years.

Table IV-6
Signs of the Problem
Comparison of Survey Results

	2003	2008	2009	2011
Number of Respondents	2,161	1,256	1,828	1,768
Reduced Expenses for Household Necessities	78%	80%	79%	72%

C. Responses to the Problem

This section examines how households have responded to the problem of unaffordable energy bills. Table IV-7 shows that the following percent of households faced these problems in 2011.

- 39 percent closed off part of their home.
- 23 percent kept their home at a temperature that they felt was unsafe or unhealthy.
- 21 percent left their home for part of the day.
- 33 percent used their kitchen stove or oven to provide heat.

The percentages are approximately the same as in 2009.

Table IV-7
Responses to the Problem
Comparison of Survey Results

	2003	2008	2009	2011
Number of Respondents	2,161	1,256	1,828	1,768
Closed Off Part of Home	39%	<u>44%</u>	36%	<u>39%</u>
Kept Home at Temperature You Felt was Unsafe or Unhealthy	<u>25%</u>	<u>28%</u>	<u>26%</u>	<u>23%</u>
Left Home for Part of the Day	<u>24%</u>	23%	20%	<u>21%</u>
Used Kitchen Stove or Oven to Provide Heat	31%	33%	33%	33%

Note: 2011 statistically significant differences at the 95% level from 2003, 2008 and 2009 are underlined.

D. Inability to Pay Energy Bills

Respondents were asked several questions about the inability to pay their home energy bill. Table IV-8 shows that the following percent of households faced these problems in 2011.

- 49 percent skipped paying or paid less than their entire home energy bill.
- 37 percent received a notice or threat to disconnect or discontinue electricity service or home heating fuel.
- 11 percent had their electricity or gas shut off due to nonpayment.
- 13 percent were unable to use their heating system because it was broken and they could not afford to pay for repair or replacement.
- 14 percent were unable to use their air conditioner because it was broken and they were unable to pay for its repair or replacement.

Table IV-8
Inability to Pay Energy Bills During Past Year
Comparison of Survey Results

	2003	2008	2009	2011
Number of Respondents	2,161	1,256	1,828	1,768
Skipped Paying or Paid Less than Entire Home Energy Bill	52%	47%	50%	49%
Received Notice or Threat to Disconnect or Discontinue Electricity or Home Heating Fuel	38%	37%	36%	37%
Electricity Shut off Due to Nonpayment	8%	9%	9%	9%
Gas Shut off Due to Nonpayment	--	6%	7%	6%
Electricity or Gas Shut off Due to Nonpayment	--	12%	12%	11%
Heating System Broken and Unable to Pay for Repair or Replacement	<u>10%</u>	13%	13%	<u>13%</u>
Unable to Use Main Source of Heat Because Unable to Pay for a Fuel Delivery	10%	13%	11%	10%
Unable to Use Main Source of Heat Because Utility Company Discontinued Gas or Electric Service Due to Nonpayment	<u>11%</u>	<u>13%</u>	11%	<u>7%</u>

	2003	2008	2009	2011
Number of Respondents	2,161	1,256	1,828	1,768
Unable to Use Air Conditioner Because it was Broken and Unable to Pay for Repair or Replacement	12%	12%	12%	14%
Unable to Use Air Conditioner Because Utility Company Discontinued Electric Service Due to Nonpayment	6%	<u>7%</u>	<u>8%</u>	<u>5%</u>
Had to Use Candles or Lanterns Due to Lack of Lights	<u>8%</u>	<u>7%</u>	<u>8%</u>	<u>5%</u>

Note: 2011 statistically significant differences at the 95% level from 2003, 2008, and 2009 are underlined.

E. Housing Problems

This section examines housing problems that respondents have faced in the past five years due to unaffordable energy bills. Table IV-9 shows that the following percent of respondents faced these problems.

- 31 percent did not make a full rent or mortgage payment.
- 14 percent moved in with friends or family.
- 4 percent moved into a shelter or were homeless.

**Table IV-9
Housing Problems During Past Five Years
Comparison of Survey Results**

	2003	2008	2009	2011
Number of Respondents	2,161	1,256	1,828	1,768
Did Not Make Full Rent or Mortgage Payment	<u>28%</u>	28%	31%	<u>31%</u>
Evicted from Home or Apartment	<u>4%</u>	<u>4%</u>	5%	<u>6%</u>
Moved in with Friends or Family	<u>9%</u>	<u>11%</u>	12%	<u>14%</u>
Moved into Shelter or Was Homeless	4%	3%	3%	4%

Note: 2011 statistically significant differences at the 95% level from 2003, 2008 and 2009 are underlined.

F. Medical and Health Problems

This section examines the medical and health problems that respondents faced in the past five years due to unaffordable energy bills. Table IV-10 shows that the following percent of households faced these problems.

- 24 percent went without food for at least one day
- 37 percent went without medical or dental care
- 34 percent did not fill a prescription or took less than their full dose of prescribed medication.
- 19 percent became sick because the home was too cold.
- 6 percent became sick because the home was too hot.

Table IV-10
Medical and Health Problems During the Past Five Years
Comparison of Survey Results

	2003	2008	2009	2011
Number of Respondents	2,161	1,256	1,828	1,768
Went Without Food for At Least One Day	22%	<u>32%</u>	<u>30%</u>	<u>24%</u>
Went Without Medical or Dental Care	38%	<u>42%</u>	<u>41%</u>	<u>37%</u>
Did Not Fill Prescription or Took Less Than Full Dose	<u>30%</u>	<u>38%</u>	33%	<u>34%</u>
Became Sick Because Home was Too Cold	21%	<u>24%</u>	<u>25%</u>	<u>19%</u>
Became Sick Because Home was Too Hot	7%	6%	<u>4%</u>	<u>6%</u>

Note: 2011 statistically significant differences at the 95% level from 2003, 2008 and 2009 are underlined.

V. Conclusion

The 2011 NEADA study confirmed that LIHEAP recipient households are likely to be vulnerable to temperature extremes. They are likely to have seniors, disabled members, or children in the home. Over 89 percent of LIHEAP recipients had at least one of these vulnerable household members. The study also showed that these households face many challenges in addition to their energy bills, including unemployment, unhealthy home conditions, and medical issues.

Energy Costs

LIHEAP recipients reported that they faced high energy costs. Forty-five percent of the respondents reported energy costs over \$2,000 in the past year and 52 percent said that their energy bills were more difficult to pay. Almost half of those who said that their energy bills were more difficult to pay said that the increased difficulty was due to a worsened financial situation.

Responses to High Energy Costs

Households reported that they took several actions to make ends meet, including closing off part of the home and leaving the home for part of the day. Some of the actions were unsafe and could lead to injury or illness, such as keeping the home at a temperature that was unsafe or unhealthy or using the kitchen stove or oven to provide heat.

Inability to Pay Energy Bills

Despite the assistance that they received, many LIHEAP recipients were unable to pay their energy bills. Almost half of the respondents reported that they had skipped paying or paid less than their entire home energy bill in the past year and more than one third said that they received a notice or threat to disconnect or discontinue their electricity or home heating fuel.

Households went without utility service and sacrificed heating and cooling their home. Eleven percent had their electric or natural gas service shut off in the past year due to nonpayment. Almost one quarter reported that they were unable to use their main source of heat in the past year because their fuel was shut off, they could not pay for fuel delivery, or their heating system was broken and they could not afford to fix it. Seventeen percent reported that they were unable to use their air conditioner in the past year because their electricity was shut off or their air conditioner was broken and they could not afford to fix it.

Housing and Financial Problems

Many LIHEAP recipients had problems paying for housing in the past five years, due at least partly to their energy bills. Almost one third did not make their full mortgage or rent payment. Six percent were evicted from their home or apartment and four percent had a foreclosure on their mortgage.

Medical and Health Problems

Many of the LIHEAP recipients faced significant medical and health problems in the past five years, partly as a result of high energy costs. Nearly one quarter reported that they went without food, 37 percent sacrificed medical/dental care, and one fifth had someone in the home become sick because the home was too cold.

The Need for LIHEAP

Households reported enormous challenges despite the fact that they received LIHEAP. However, they reported that LIHEAP was extremely important. Many reported that they would have kept their home at unsafe or unhealthy temperatures and/or had their electricity or home heating fuel discontinued if it had not been for LIHEAP.

It is clear that many of these households will continue to need LIHEAP to meet their energy and other essential needs.

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

9/20/2023 3:55:47 PM

in

Case No(s). 23-0023-EL-SSO, 23-0024-EL-AAM

Summary: Testimony Testimony Recommending Modification of the Stipulation of
Andrew R. Tinkham on Behalf of the Office of the Ohio Consumers' Counsel
electronically filed by Ms. Alana M. Noward on behalf of Michael, William J..