BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power Company for Authority to Abandon Electric Service Lines, Pursuant to Ohio Revised Code Sections 4905.20 and 4905.21	))))	Case No. 23-563-EL-ABN

REPLY COMMENTS OF OHIO POWER COMPANY

Pursuant to the November 6, 2023 Entry in this proceeding, Ohio Power Company ("AEP Ohio") submits the following Reply Comments on the abandonment application.

I. INTRODUCTION

It is telling how little NEP's Initial Comments addressed the Miller Act standard – that is, whether the abandonment would be "reasonable" considering the "welfare of the public." *See* R.C. 4905.21. In fact, in numerous NEP filings in multiple cases, NEP has never articulated any way in which submetering is beneficial for customers, which in this case are the 114 residential customers who would be converted from public utility service to submetering. When NEP talks about benefits from submetering, it only ever cites benefits *to the landlord*, which here is The Edwards Companies ("Edwards"). (*See* NEP Comments at 21 ("Under the contract, Edwards will receive meaningful economic benefits and infrastructure upgrades that will enhance the competitiveness of Fisher Commons in the residential market.").

While the proposed conversion of the Fisher Commons will likely bring lucrative "economic benefits" to Edwards and NEP (NEP Comments at 21), the conversion is unreasonable and contrary to the "welfare of the public" because of its effect on Fisher Commons' residents. As AEP Ohio explained in its Initial Comments, the Fisher Commons customers will lose a myriad rights and benefits that the Ohio General Assembly has deemed

necessary to protect electric service customers. Citing the Commission's decision in the recent submetering complaint case, *Ohio Power Co. v. Nationwide Energy Partners, LLC*, Case No. 21-990-EL-CSS ("Complaint Case"), NEP argues that "[t]o the extent that the Commission can address the 'issues' AEP Ohio speculates about in its Application, it already has." (NEP Comments at 23.) There were, however, numerous harms caused to submetered customers that the Commission's decision in the Complaint Case did not (and could not) remedy. Moreover, the Commission declined AEP Ohio's request in that case to address the conversions under the Miller Act – so the Complaint Case decision cannot possibly be cited as precedent to address the issues presented in the case at bar. As a related matter, NEP suggests that the resale tariff updates ordered in the Complaint Case decision should adequately protect residents. (*Id*.) But that tariff has not yet been approved; so at a bare minimum, the Commission should defer a decision in this case until after the tariffs are effective.

One of the significant public harms is the loss of the Percentage of Income Payment Plan ("PIPP"). While there are not currently any Fisher Commons customers on the PIPP program this is an incredibly important right/program that they could avail themselves of at anytime. As AEP Ohio explained in its Initial Comments, all of the Fisher Commons residents – who are served by AEP Ohio and currently shopping through the city of Columbus aggregation – will also lose the right to shop for electric service, and whether those residents will be protected from unreasonable disconnection practices after the Complaint Case is, at best, highly uncertain. Conversion to submetering plainly will not further the "welfare of the public" under the Miller Act. Whatever rights landlords have to establish master meter service when initially developing property, there is no corollary right to switch back-and-forth or convert a property after the utility has built out to serve the initial configuration; a proper examination under the Miller Act

(including a hearing) cannot lawfully be ignored or bypassed in a proposed master metering conversion such as Fisher Commons.

Rather than seriously address the Miller Act standard, NEP instead raises numerous legal claims, arguing that landlords have a "right" to submeter tenants and that the outcome of this case is controlled by the Commission's decision in the Complaint Case. All these arguments, however, are red herrings in a Miller Act inquiry. As explained more fully below, and in AEP Ohio's Memorandum Contra NEP's Motion to Dismiss, the Ohio Supreme Court has made clear that under the Miller Act, timing matters. If the Fisher Commons complex were a new building, and AEP Ohio had never served the tenants, the Miller Act would not apply, and all of NEP's arguments about a landlord's current "right" to submeter the building would be applicable. But once AEP Ohio began serving the Fisher Commons residences 16 years ago, they became *existing customers*, and the Miller Act protections attached. Under the Miller Act, AEP Ohio cannot be forced to abandon any existing customer load unless the Commission holds that the abandonment is "reasonable." And the Ohio Supreme Court has clearly stated that those Miller Act protections of existing customers apply *even if they will be served by another entity after abandonment*. This renders all of NEP's arguments about landlord's rights irrelevant to the Miller Act inquiry here.

II. REPLY COMMENTS

A. NEP's Complaints About AEP Ohio's "Service Plan" Are Red Herrings Because AEP Ohio Has No Obligation to Sell Its Equipment and the Miller Act Applies to All Abandonments of All "Load Centers," Regardless of Size.

NEP argues that this is simply a "metering arrangement," taking place on "private property" to which the Miller Act does not apply. (NEP Comments at 13-17.)

But the Ohio Supreme Court has addressed precisely the kind of forced takeover of electric service that NEP is envisioning, and the Court clearly held that the Miller Act applies and

requires the Commission to consider whether the forced takeover is "reasonable" and furthers the "welfare of the public." In *State ex rel. Toledo Edison Co. v. Clyde*, 76 Ohio St. 3d 508 (1996), the City of Clyde ordered public utility Toledo Edison to abandon its service within the City to enable the municipal utility to take over electric service to that same load. The Supreme Court held that the Miller Act applied to this forced takeover of electric service from Toledo Edison, and it held that the Miller Act required approval from the Commission before Toledo Edison could be forced to end its service to its existing customers. *Clyde*, 76 Ohio St. 3d at 516.

NEP's argument that the Miller Act does not apply rests upon the assertion that "all lines will remain in place and in service." (NEP Comments at 15.) As set forth in the CIAC agreement upon which NEP so heavily relies, however, NEP consented to installation of three-phase overhead primary" service as well as the "***remov[al] of AEP existing facilities once energized***." NEP appears to admit that "the primary service chosen by Edwards . . . requires AEP Ohio to remove or decommission [] lines." (NEP Comments at 15.) Thus, NEP cannot then argue out of the other side of its mouth that the existing lines will remain in place. To the contrary, one could think of few examples that would more blatantly result in an abandonment than an express "removal of existing facilities."

Equally unavailing on the Miller Act analysis is NEP's emphasis on execution of a CIAC agreement between AEP Ohio and Edwards and any corresponding construction activities that took place based upon NEP's "reliance." (NEP Comments at 3, 16.) Contrary to the apparent assertions of NEP, certainly, AEP Ohio cannot waive the statutory protections of third parties (the 114 residential customers) that are afforded under the Miller Act. The parties understood (or NEP/Edwards should have understood) that the completion of any project would require the necessary regulatory approvals – including requirements under the Miller Act. Indeed, the CIAC

agreement expressly reserves the Company's rights including any right available under its tariffs. Thus, the CIAC agreement is subservient to AEP Ohio's tariffs, which do not permit service if it is unlawful (such as violating the Miller Act).

Dissatisfied with the factual makeup of this case (including the express agreement to remove (abandon) existing facilities), NEP goes on to speculate about hypothetical scenarios of requesting secondary service, including the potential sale of secondary equipment, that are not presented in this case. (NEP Comments at 16-17.) Not only does this factual scenario not exist, but AEP Ohio has no obligation to sell its equipment.[1] NEP sought such a requirement in AEP Ohio's most recent base case, but the stipulation that was approved by the Commission only required AEP Ohio to respond to a request to purchase equipment within a specified time. *See* Case No. 20-585-EL-AIR, March 12, 2021 Joint Stipulation and Recommendation ¶ III.E.12 ("The Company agrees to make best efforts to respond within 21 days to customer requests to purchase AEP Ohio facilities on customer premises.").

In an attempt to paint some Picassoesque picture of "discrimination," (NEP Comments at 13) NEP cunningly tries to point to the rate case to argue that AEP Ohio already has a "well-established existing process" for selling equipment. (NEP Comments at 16.) While it is true that AEP Ohio does have a process for selling equipment to customers, this is not a case of an existing customer purchasing equipment that is used solely to service that customer, which is the well-established process referenced by AEP Ohio witness Moore in the rate case. Rather, this is a third party (Edwards/NEP) that would be purchasing equipment that is ***currently*** used to serve 114 ***existing*** residential customers. That is an important factual distinction that NEP routinely

[1] Moreover, under the approved tariff, it is the Company's responsibility, subject to the electric code and in keeping with sound engineering practices, to design a service plan for extension of facilities. (*See* Ohio Power Company Terms and Conditions of Service (PUCO No. 21) at ¶¶ 8-10.)

chooses to ignore with attempts to obfuscate the nature of the request. As such, AEP Ohio cannot just abandon those residential customers without complying with the Miller Act. Nor is AEP Ohio required or otherwise obliged to sell its equipment under such conditions.

Tellingly, NEP points to requests for secondary master metered service at Northtowne and Sugar Run – but this case is not about Northtowne and Sugar Run, it is about Fisher Commons. (NEP Comments at 14.) NEP uses the Northtowne and Sugar Run examples in an attempt to formulate an argument (incorrectly) that the Miller Act does not apply because AEP Ohio's lines do not serve the 114 residential customers at Fisher Commons by alleging that AEP Ohio's existing lines "end at Edwards' meter stacks outside of each building," such that "AEP Ohio's lines serve whole buildings, not individual tenants." (NEP Comments at 13-14.) This continues to overlook the very obvious point that AEP Ohio serves customers, not buildings – and the current request for service seeks the elimination of service to 114 residential customers. Nevertheless, it is uncontroverted that AEP Ohio's lines run all the way to the meter stacks outside of each building; thus, electricity would fail to flow to the 114 residential customers on that property without AEP Ohio's lines that are existent on the property. A cessation of that electricity flow would be an abandonment and is not serve the public welfare.

More importantly, NEP's arguments about the amount, extent, or type of abandoned equipment are legally irrelevant under the Miller Act. In *Clyde,* the Court held that the Miller Act applies to *any* abandonment of service, even abandonment of "individual-customer-service lines." *Clyde*, 76 Ohio St. 3d at 515. The Court reasoned:

> [W]e find that the General Assembly's intent to protect consumers is best promoted by interpreting the Miller Act to apply to the abandonment or withdrawal of services from any electric line, *including individual-customer-service lines* like the ones at bar. This interpretation maximizes consumer

> protection and reduces the opportunities for abuse by requiring commission oversight and review over the abandonment of *any electric line, regardless of size*.

Id. (emphasis added). Here, there is no question that AEP Ohio maintains service to over one-hundred residential customers at Fisher Commons. The proposed conversion is a forced "withdrawal of services" from those lines, and that is true whether AEP Ohio abandons the lines in place, repurposes them elsewhere (as AEP Ohio would do with any removed meters, at a minimum), or sells them to NEP or Edwards. Thus, the Miller Act applies here, and the scope of the abandoned equipment is irrelevant. Rather, the key point in considering the "welfare of the public," R.C. 4905.21, is that 114 residential customers at Fisher Commons will lose key statutory protections, including PIPP, the right to shop, and various other rights/protections if the conversion is approved.

Clyde also established that it not just about the physical infrastructure and the rights that the 114 residential customers would lose. The Miller Act and its predecessor the Gilmore Act "were specifically enacted and have been used to protect existing utility facilities, utility consumers, and their utility providers from the forced termination of utility services or the removal of nonmunicipal utility facilities without commission approval." *Clyde*, 76 Ohio St. 3d at 514. The Court has further found that "the Miller Act protects not only the utility provider's electric lines, but also the provider's right to continue 'furnishing service' over those lines to its current customers." *Clyde* at 516. As discussed below, there is a nexus between AEP Ohio, its existing facilities, and its customers, which should not be severed under these conditions.

B. The Landlord's "Right" to Submeter a Building Is Irrelevant Under the Miller Act Because Fisher Commons Is Not New Load, and the Miller Act Protects the "Nexus" Between AEP Ohio and Its Existing "Load Centers."

NEP puts forward numerous legal arguments about submetering. NEP argues that landlords have a "well-established legal right" to submeter their properties and that "[a]dhering

to the law is *per-se* reasonable." (NEP Comments at 9, 17.) Similarly, NEP argues that Edwards has a "choice" to submeter Fisher Commons under AEP Ohio's Tariff. (NEP Comments at 18-19.) NEP also argues that the "landlord-tenant" relationship is outside the Commission's jurisdiction. (NEP Comments at 19-20.)

All these legal arguments are completely out of step with the Ohio Supreme Court's explanation of the Miller Act. In *Clyde*, the Ohio Supreme Court made clear that under the Miller Act, timing matters. A key fact in *Clyde* was that the customers in question were *existing* customers that Toledo Edison had begun serving in the past and was currently serving at the time of the case. As *Clyde* explained, this was a crucial distinction because the Miller Act and its predecessor statute were "specifically enacted and have been used to protect *existing* utility facilities, utility consumers, and their utility providers." *Clyde*, 76 Ohio St. 3d at 514 (emphasis added); *see also id.* at 513 (explaining that "the Miller Act focuses on protecting *existing utility customers*" (emphasis added). *Clyde* also explained that the Miller Act does *not* protect a utility's right to serve *new* load. *Clyde* summarized the Miller Act as follows:

> Simply stated, the Miller Act protects the nexus between the utility provider and its existing facilities or load centers, binding them together in such a manner that only the commission can compel termination of that relationship. New facilities or load centers have no nexus to the public utility . . . .

Id. at 516; *see also id.* at 515 ("The [Miller] Act protects only *existing* facilities and the service rendered thereby." (emphasis added)).

Here, therefore, NEP's arguments about Edwards' right to submeter the Fisher Commons complex might be applicable if the Fisher Commons residences were *new load* that AEP Ohio had never served. In that new load scenario, the Miller Act would not apply. Here, however, when AEP Ohio began serving the Fisher Commons residences 16 years ago, this created a "nexus between the utility provider and its existing facilities or load centers, binding them

together in such a manner that only the commission can compel termination of that relationship." *Clyde*, 76 Ohio St. 3d at 516.

Likewise, NEP's argument that the master meter tariff establishes a landlord right to convert an individually-metered property is misguided and does not displace the Miller Act public interest inquiry. A landlord's right to service under the tariff is not absolute but it qualified by the law and by other parts of the tariff, including the resale tariff (with the additional terms and conditions update that is currently pending), fulfillment of other general terms and conditions of service in the Company's tariff and the Miller Act. So whatever rights landlords have to establish master meter service when initially developing property, there is no corollary right to endlessly switch back-and-forth or convert a property after the utility has built out to serve the initial configuration. In short, a proper examination under the Miller Act (including a hearing) cannot lawfully be ignored or bypassed in a conversion situation such as Fisher Commons.

Unlike the Northtowne abandonment proceeding (Case No. 22-693-EL-ABN) where NEP argued that the tenant harms "are illusory" in part because of the updates ordered to the resale tariff by the Complaint Case decision (NEP 22-693 Comments at 19-20), NEP omits such arguments in its current comments. Similarly, in the Northtowne proceeding as well as this proceeding, NEP's comments included "Exhibit NEP-1" which referenced language "to be included" into the tenant leases. But the language attached as Exhibit NEP-1 is nothing more than a "sample" that is not supported by affidavit or evidence (which AEP Ohio contests or proof that each residential lease contains such language. In deciding this case, the Commission cannot presume that either of these events are complete with respect to Fisher Commons – yet the

consumer harms undoubtedly exist. More importantly, it carries little if any weight in a Miller Act analysis.

Equally unavailing is NEP's argument that the Commission should not address the "reasonableness" of the proposed conversion to submetering because the "landlord-tenant" relationship is outside the Commission's jurisdiction. (NEP Comments at 19-20.) Regardless of the scope of the Commission's jurisdiction over the landlord-tenant relationship (the Commission clearly has *some* jurisdiction there, as shown by the restrictions on landlords in the new tariff ordered in the Complaint Case), this Miller Act inquiry is not about the landlord-tenant relationship. The Commission currently has jurisdiction over the "nexus" between AEP Ohio and the "load centers" that are the Fisher Commons residences, and the question here under the Miller Act is whether the Commission should "compel" a "termination of that relationship." *Clyde*, 76 Ohio St. 3d at 516. Thus, if the Commission approves the conversion to submetering, its jurisdiction will be significantly reduced. Now, however, the Commission maintains full jurisdiction over AEP Ohio's service to the Fisher Commons residences, and the Commission is authorized by the Miller Act to require that this service be maintained if a forced withdraw of service is "unreasonable" (which it is).

C. The Fact That Residents Would Continue to Receive Electric Service "Through Their Landlord" Is Irrelevant, Because the Miller Act Applies to Any Takeover of Electric Service from One Provider to Another.

NEP claims that the forced conversion to submetering is reasonable because the "tenants will continue to receive electric service supplied by AEP Ohio through their landlord." (NEP Comments at 21.) To support that argument, NEP cites two gas abandonment cases. (*See* NEP Comments at 21 nn.8-9.) NEP has again put forward an argument that fails on multiple grounds.

First, the fact that the Fisher Commons residents will continue to receive electric service "through their landlord" is irrelevant, as *Clyde* demonstrates. As discussed above, *Clyde* makes

clear that the fact that service is continued in another form does not exempt the abandonment from Miller Act review. Indeed, in *Clyde*, the residential customers in question were not at risk of losing electric service because they would continue to receive electric service from the municipal utility if Toledo Edison were forced to abandon its service to them. That was, in fact, the entire point of the forced abandonment in *Clyde* – the City wanted to force out Toledo Edison so its municipal utility could take over. The *Clyde* "takeover" scenario is precisely the same as what Edwards (and NEP) are attempting here. Here, therefore, the Commission is required to determine whether the proposed conversion to submetering is "reasonable" and furthers the "welfare of the public" even though the residents will continue to receive electric service "through their landlord." And in making that determination, the Commission should hold that the conversion is *not* reasonable, since service "through the landlord" will lack many of the statutory rights and benefits that come with service from AEP Ohio, as AEP Ohio explained in its Initial Comments.

Second, the cases cited by NEP are inapposite for the simple reason that the abandonments were uncontested. Indeed, in both cases, in stark contrast to the situation here, the utility *requested and supported* the abandonment. *In re Application of Northeast Ohio Natural Gas Corp. for Authority to Abandon Service*, Case No. 22-789-GA-ABN, Finding and Order (May 18, 2016) ("*Northeast* Finding and Order"); *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Authority to Abandon Natural Gas Service*, Case No. 15-1272-GA-ABN, Finding and Order (May 18, 2016) ("*Columbia* Finding and Order"). Moreover, no parties raised the concerns (very much present here) about customers losing their statutory rights and benefits of public utility service. *See Northeast* Finding and Order ¶ 8 (noting that Dominion had already taken over service); *Columbia* Finding and Order ¶ 4-5 (single customer line was abandoned

where customer did not object and service was "not economically feasible). Finding of public interest is a completely different matter under the undisputed facts here: current AEP Ohio customers would be stripped of statutory rights if the conversion is approved.

D. "Interference With Contract" Is Not a Relevant Miller Act Consideration.

Taking another tack, NEP claims that the Commission must find the conversion to submetering reasonable because to do otherwise would "interfere" with the contract between NEP and Coastal (NEP Comments at 19-20). That argument, as with NEP's other arguments, is simply inapposite. There is no authority suggesting that the Miller Act considers private contracts in the "reasonableness" analysis. Nor does applying Ohio law (the Miller Act) somehow "interfere" with private contracts.

For similar reasons, NEP's argument that the tenants have "agreed" to the conversion in boilerplate lease language is meritless. As an initial matter, it is questionable whether the Fisher Commons residents knew or fully understood the impacts of the public utility benefits and protections that they were giving up by signing an adhesion contract containing legalese about submetering. The Commission should decline to give effect to that part of the lease as void against public policy. Ultimately, these are contested matters that should be resolved through an evidentiary hearing, as required by the Miller Act. In any event, even if the residents had agreed, the Miller Act protects the utility (here, AEP Ohio) as well as the customer. The Miller Act expressly states that it applies not just where a utility wishes to abandon service, but also where the utility is being "required to abandon or withdraw" service against its will. Moreover, as *Clyde* explains, once a utility begins serving customers, the Miller Act creates a "nexus between the utility provider and its existing facilities or load centers, binding them together in such a manner that only the commission can compel termination of that relationship." *Clyde*, 76 Ohio St. 3d at 516. This is why, under *Clyde*, the "name" on the customers account does not matter.

Id. at 515 ("[The utility's] existing electric lines do not become unprotected by the Miller Act merely because the name on the bill changes."). The Miller Act applies to "existing facilities" and "load centers," and protects the utility from any forced withdraw from those facilities or load centers without Commission approval. Therefore, this tenant consent argument – as with NEP's other arguments – is merely a red herring that distracts from the Commission's true inquiry here into the reasonableness of the forced conversion.

E. When Considering the Public Welfare, it Would be Unreasonable to Grant the Abandonment.

As set forth in AEP Ohio's Initial Comments, if abandoned, the Fisher Commons customers will immediately lose access to the ability to avail themselves of the protections of PIPP should they fall below 175% of the federal poverty level (that is required to qualify for PIPP). The Fisher Commons residents will also lose their right to shop for competitive retail electric service, resulting in termination of 114 active contracts through the City of Columbus aggregation if the Commission grants abandonment. Granting abandonment would also place the Fisher Commons residents into the murky waters of the current disconnection regulations applicable to submetered customers – an issue that is steeped in legal and practical concerns. Finally, it is not in the public welfare to forcefully remove the regulated utility that has safely and reliably served these customers for over a decade and a half; especially, under the aforementioned conditions.

These poignant concerns were not sufficiently addressed by NEP/ Fisher Commons and should be duly considered by the Commission, leading to the inexorable conclusion that abandonment should not be granted.

F. The Commission should ignore NEP's additional extra-record (contested) and hearsay statements that attempt to support the benefits of "master metering" to the rental market.

Finally, NEP submits over six pages of business and policy arguments support of master metering's importance to the rental market. (NEP Comments at 22-29.) Some of the statements are hearsay from third parties and some is just unsupported narrative or "testimony" in the form of comments without being supported by empirical or objection evidence. In addition to being contested extra-record material, the arguments miss the mark and address landlord business interests while ignoring the tenant/consumer harms and the Miller Act determinations that need to be made without regard to insular business interests. Further, landlord or real estate industry benefits ignore the separate and distinct conduct of a large-scale third-party submetering company that is different from the property owner or landlord rights and activities. Moreover, the arguments in this section presume that the resale tariff updates are in place (which is not the case) and that the provisions are effective in addressing consumer harms (which AEP Ohio disputes). In sum, the matters asserted by NEP in this section are disputed and contested by AEP Ohio.

NEP itself admits that the issues presented are undetermined and require substantial additional analysis (to overcome the consumer harms already acknowledged in the Complaint Case):

> If it is possible at all, analyzing whether a particular conversion to master-metered service is "reasonable" would require at least a thorough understanding of the residential leasing market, the business model of the landlord, the features of the community and condition of its infrastructure, housing regulations and assistance programs like HEAP, the trends in preferences of tenants, and how these and countless other variables may change in the future.

(NEP Comments at 26.) In other words, evidence and a hearing is required before making a determination of whether an abandonment is "reasonable" under the Miller Act. Given that this is a contested proceeding, the Commission should set the matter for hearing.

III. CONCLUSION

For the foregoing reasons, for the reasons articulated in AEP Ohio's Initial Comments, and for the reasons AEP Ohio expects to develop further in the evidentiary record at hearing,[2] the Commission should deny the proposed abandonment of the customers at Fisher Commons.

Respectfully submitted,

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[2] As AEP Ohio explained in its Initial Comments (at 11), the Miller Act requires the Commission to hold an evidentiary hearing before ruling on the proposed abandonment in this proceeding. *See* R.C. 4905.21.

CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing was sent by, or on behalf of, the undersigned counsel to the following parties of record this 21st day of February 2024, via electronic transmission.

/s/ Steven T. Nourse
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Summary: Comments Reply Comments electronically filed by Mr. Steven T. Nourse on behalf of Ohio Power Company.