

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Direct)	
Energy Business, LLC and Direct Energy)	
Services, LLC for Waivers of Certain)	Case No. 18-0382-GE-WVR
Provisions of Chapters 4901:1-21 and)	
4901:1-29, O.A.C., to Permit Third-Party)	
Verification by Digital Confirmation.)	

**INITIAL COMMENTS OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

The Retail Energy Supply Association (“RESA”)¹ submits these initial comments in support of the application filed by Direct Energy Business, LLC and Direct Energy Services, LLC. The application in this proceeding seeks to offer customers the ability to complete the verification process through digital confirmation (“Digital TPV”). Ohioans should have this advanced process as an option to the customer for verifying enrollment in a competitive retail energy service, and importantly, this option is consistent with multiple statutory policies in Ohio.

For example, it is the policy of this State to recognize the continuing emergence of competitive retail electric and natural gas markets “through the development and implementation of flexible regulatory treatment.” *See* R.C. 4928.02(G) and 4929.02(A)(6). It is also the policy of Ohio to ensure or promote supplies and suppliers by giving customers “effective choices over the election of those supplies and suppliers.” *See* R.C. 4928.02(C) and 4929.02(A)(3). Use of a digital confirmation for verifying enrollments is fully consistent with those policies.

Importantly, the proposal before the Commission in this matter can provide customers with another efficient, effective, and appropriate way for Ohioans to verify their enrollment in

¹ The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

competitive retail energy services. The Digital TPV process will be efficient while gathering the necessary information. It will keep customer proprietary information safeguarded and will not be onerous, overwhelming or unduly lengthy. This verification process also reflects how many consumers communicate today with businesses – via text confirmations, email or through online chats. The proposal, if implemented, will benefit Ohioans by providing an additional option for the enrollment verification process.

Further, the Digital TPV process involved in this waiver request is similar to the combination telephonic and electronic TPV process that the Commission authorized via a waiver in July 2019. *See In the Matter of the Application of AEP Energy, Inc. for a Partial Waiver of Ohio Adm.Code 4901:1-29-06 and 4901:1-21-06*, Case Nos. 18-371-EL-WVR and 18-372-GA-WVR, Entry (July 17, 2019).

Lastly, as the Commission is aware, RESA has long advocated through many Commission proceedings, workshops and workgroups for improvements to the customer experience in Ohio's competitive retail markets, including improvements for the overall process of enrolling for competitive retail energy services. The application in this proceeding presents such an improvement, follows Ohio policy, and will further develop Ohio's competitive retail energy markets if approved.

The Commission can support competitive retail energy choices and help develop the Ohio competitive retail energy market by allowing digital verification of enrollments.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

Michael J. Settineri (0073369), Counsel of Record

Gretchen L. Petrucci (0046608)

Vorys, Sater, Seymour and Pease LLP

52 E. Gay Street

Columbus, OH 43215

Telephone 614-464-5462

Facsimile 614-719-5146

msettineri@vorys.com

glpetrucci@vorys.com

Counsel for the Retail Energy Supply Association

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served (via electronic mail) on the 8th day of August 2019 upon all persons/entities listed below:

Mark A. Whitt
Rebekah J. Glover
Whitt Sturtevant LLP
whitt@whitt-sturtevant.com
glover@whitt-sturtevant.com

Terry L. Etter
Amy Botschner O'Brien
Office of the Ohio Consumers' Counsel
Terry.etter@occ.ohio.gov
amy.botschner.obrien@occ.ohio.gov

Joseph M. Clark
Stephen B. Seiple
Columbus Gas of Ohio, Inc.
josephclark@nisource.com
sseiple@nisource.com

/s/ Gretchen L. Petrucci

Gretchen L. Petrucci