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## II. COMMENTS

### A. Proposed Rule 4901:1-13-11(B)(13), Price to Compare on LDC Customer Bills

Staff's proposes to require that LDCs include a statement on customer bills reflecting that the gas cost recovery ("GCR") or standard choice offer ("SCO") rate is the price-to-compare ("PTC"). Specifically, Staff proposes the following statement:<sup>2</sup>

In order for you to save money by selecting a competitive retail natural gas provider, your price to compare, which is the standard choice offer (SCO) or the gas cost recovery (GCR) rate, is (dollar amount per Mcf) for this billing month. The SCO rate or GCR rate is approved by the public utilities commission.

There are many reasons why Staff's proposal should not be adopted. First, Staff proposes that all customers receive this notice every month even though it may not apply to the customer. The language assumes the customer is receiving default service from the LDC at the time of the bill. The customer, however, could be shopping and other supply options could save the customer money. Additionally, the language assumes the customer is eligible to shop, but that may not be an option for the customer.

Second, the SCO and GCR rates are not the proper comparison point because they are based on different pricing structures. For example, the GCR rate is a variable, cost-only quarterly rate, subject to adjustment during subsequent Commission audits. *See* Ohio Admin. Code Rules 4901:1-14-05(A)(1) and 4901:1-14-07. A snapshot of the GCR should not be compared to a supplier's fixed-rate offer for a one-year, two-year or longer period which is an entirely different form of rate structure. Similarly, the GCR rate structure differs from a CRNGS supplier's variable rate that changes monthly. The SCO rate is a variable rate too. *See* Columbia Tariff PUCO No. 2 at Sheet 22; Dominion Tariff at Sheet B-SSO-3; and Vectren Tariff PUCO

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<sup>2</sup> Staff Proposal at 31.

No. 4 at Sheet 44.<sup>3</sup> Under Staff's proposal, the SCO rate for comparison would be the last month's SCO rate included on the customer's bill. It would be inappropriate to assume that a supplier's forward-looking offer can be compared legitimately with a looking backward default service price. Using the SCO or GCR rate would have customers making apples-to-oranges comparisons.

Third, Staff's proposal omits all key information that a customer would need to understand the SCO and GCR rates when trying to use those rates in a proper comparison, while unlawfully endorsing the default rates over supplier rates. Examples of key missing information include: the GCR and SCO are variable rates, the PTC is a snapshot based on historic SCO and GCR rates, and the GCR and SCO rates do not include components found in different CRNGS offers. The Staff's PTC proposal also does not invite the customer to use the Commission's energy choice website where numerous offers and the SCO and GCR rates are listed and apples-to-apples comparisons can be made.<sup>4</sup> While omitting such key information, the Staff's proposal states that the Commission has approved the SCO rate and GCR rate listed. This implies deference or support for those default rates as if they are somehow better by virtue of having the Commission's approval. Commission endorsement of the default rates over supplier rates does not promote diversity of natural gas supplies and suppliers or recognize the continuing emergence of the CRNGS market through flexible regulatory treatment. The Commission, however, is required to follow these natural gas policies of Ohio. *See* Ohio Revised Code Sections 4929.02(A)(3) and (6) and (B).

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<sup>3</sup> It is noteworthy as well that not all SCO costs are recovered through the SCO rates. For instance, Columbia and Vectren recover SCO costs in other riders as well. *See* Columbia Tariff PUCO No. 2 at Sheet 30a (CHOICE/SCO Reconciliation Rider) and Vectren Tariff PUCO No. 4 at Sheet 41 (Exit Transition Rider).

<sup>4</sup> Staff does proposes that, for the LDCs with a choice program, the LDC bills include a notice of the energy choice website. *See* Staff Proposal at page 32, Proposed Rule 4901:1-13-11(B)(28). That language will be undermined by the PTC statement proposed by the Staff.

Fourth, the Staff PTC proposal would mislead customers. Customers served by LDCs without a choice program would be led to believe that they have the ability to select a CRNGS supplier. Customers in Dominion's service territory would be led to believe that they may select the SSO, but not all customers in Dominion's territory may do so. The Staff's proposed statement could also mislead customers in Columbia's, Dominion's, and Vectren's service areas into believing that a GCR rate is available to them when it is not. The Commission should not accept Staff's proposal.

RESA has identified multiple flaws with the Staff's proposed PTC language and for each and all of these reasons, the Commission should not accept the Staff's proposed PTC language.

**B. Proposed Rules 4901:1-13-11(B)(21) and (K), Non-Commodity Charges on Customer Bills**

Staff proposes in Proposed Rule 4901:1-13-11(B)(21) to require LDCs to include on non-residential customer bills every charge for non-tariffed or nonregulated services, along with the name and telephone number of the provider. In addition, Staff proposes a new provision (K) that would expressly prohibit residential bills from including charges for anything except the LDC's approved tariff charges and CRNGS commodity charges. The Staff's revisions on this point are as follows:

(B) Bills issued by or for the gas or natural gas company shall be accurate and rendered at monthly intervals and shall contain clear and understandable form and language. Each bill shall display all of the following information:

\* \* \*

~~(20)~~(21) If applicable for nonresidential bills, each charge for a service that is either nontariffed or nonregulated and, with regard to services that are, the name and toll-free telephone number of each provider of service.

\* \* \*

(K) Natural gas residential bills are to contain only charges that are either a natural gas or competitive retail natural gas commodity charge or an approved tariffed distribution charge or service.

The Commission should maintain the status quo and not preclude the LDCs from billing non-commodity goods and services. The Commission's rules currently allow the LDC bills to include charges for non-commodity goods and services. See Ohio Admin. Code Rule 4901:1-13-11(B)(20). And, LDCs in Ohio are including charges for non-commodity goods and services. See e.g. *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of a Revised Bill Format*, Case No. 17-2561-GA-UNC. The bill sample included with that automatically approved application shows non-commodity charges on residential customer bills.

Importantly, Staff has provided no explanation or basis for its proposal. Without a compelling reason on the record or any statutory basis for the proposed change, the Commission may not abandon its policy. See *Ohio Consumers' Counsel v. Pub. Util. Comm.*, 10 Ohio St.3d 49, 50-51 (1984) ("When the Commission has made a lawful order, it is bound by certain institutional constraints to justify that change before such order can be changed or modified.") The Commission must explain why it is departing from a prior order and the new course must be substantively reasonable and lawful. *In re Application of Ohio Power Co.*, 144 Ohio St.3d, 1, 10 (2015) citing *In re Application of Columbus S. Power Co.*, 128 Ohio St.3d 512 (2011). In this matter, nothing has been presented.

For all of the above reasons, the Commission should not adopt Staff's proposed changes to Proposed Rules 4901:1-13-11(B)(21) and (K).

RESA, however, would not be opposed to revisions to the rules to ensure fair and equal access to non-commodity billing. To that end, RESA recommends that the Commission include parameters in Rule 4901:1-13-11 as a new provision (K):

(K) If the gas or natural gas company allows any nontariffed or nonregulated services on the gas or natural gas company bills, the provider may be a competitive retail natural gas service supplier, an affiliate of the gas or natural gas company, or another third party. The gas or natural gas company shall:

(1) Provide the same access to include non-commodity charges on the bill to any non-affiliate service provider as an affiliate of the gas or natural gas company.

(2) Apply any charges for access to the bill uniformly.

**C. Proposed Rules 4901:1-13-12(D)(1) and (2), Nondisclosure of Consumer-Specific Information**

The Commission’s existing rules prohibit the disclosure of a customer’s account number and social security number without the customer’s written consent through a separate written consent form unless under a few limited exceptions and circumstances. *See* Ohio Admin. Code Rule 4901:1-13-12(D). Staff proposes to add to that current list “any customer information not provided on the eligible-customer lists.”<sup>5</sup>

This proposed additional language is overly broad and would apply to any information – sensitive or not sensitive. Staff’s proposal would potentially preclude or impact the sharing of information with CRNGS providers for the Top 25% List and SCO call transfers that the Commission approved last year in *In the Matter of the Application of Vectren Energy Delivery of Ohio, Inc. for Approval of an Increase in Gas Rates, etc.*, Case Nos. 18-298-GA-AIR et al., Opinion and Order (August 28, 2019). It could also undermine good faith discussions among the

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<sup>5</sup> The Staff’s proposal also deletes the cross-reference to similar language in the CRNGS rules, specifically Ohio Admin. Code Rule 4901:1-29-09. Staff Proposal at 37-38. RESA does not object to the deletion in Proposed Rule 13-12(D)(1) and (2).

parties of billing enhancements and sharing peak day information, which were also part of the terms approved in the stipulation in that case. *Id.* Additionally, the language would result in a blanket prohibition against disclosure that could unintentionally hamper the LDC. For example, the LDC would be precluded from disclosing information that could be necessary for safety purposes. Also, it could preclude the LDC from disclosing usage information in the event of a meter-related matter.

RESA suggests that the Commission allow customer-specific information to be reasonably disclosed as necessary for additional reasons, such as operational, safety, and dispute-resolution purposes:

(D) Customer-specific information.

(1) ~~Except as otherwise provided in rule 4901:1-29-09 of the Administrative Code, a~~ gas or natural gas company shall not disclose a customer's account number or any customer information not provided on the eligible-customer lists prescribed in paragraph (C) of rule 4901:1-13-14 of the Administrative Code without the customer's written consent or electronic authorization, or a court or commission directive ordering disclosure, except for the following purposes:

(a) A gas or natural gas company's collections and/or credit reporting activities.

(b) Participation in the home energy assistance program, the emergency home energy assistance program, and the percentage of income payment plan programs.

(c) Cooperation with governmental aggregators.

(d) Operational, safety, and dispute-resolution purposes.

(e) When authorized by Commission decision or Ohio law.

The gas or natural gas company must use the consent form described in this rule, ~~unless authorization is obtained electronically.~~ Electronic consent forms will use the same format as described in paragraph (D)(3) of this rule.

**D. Proposed Rule 4901:1-13-12(F)(3), Notice regarding Customer Right to Object to Being on the Eligible-Customer List**

Staff proposes to require the LDC to do the following:

(3) Prior to issuing any eligible-customer lists and at least four times per calendar year, provide all customers clear written notice, in billing statements or other communications, of their right to object to being included on such lists. Such notice shall include instructions for reporting such objection. This notice shall read as follows: “We are required to include your name, address, and usage information on a list of eligible customers that is made available to other retail natural gas suppliers or governmental aggregators. If you do not wish to be included on this list, please call \_\_\_\_\_ or write \_\_\_\_\_, or complete the appropriate form on \_\_\_\_\_ website.”

Staff’s Proposed Rule 4901:1-13-12(F)(3) mirrors language that has been in effect and applicable to the LDCs in Rule 4901:1-29-09(C)(5). RESA does not object to its placement in Rule 4901:1-13-12 and notes that Staff does not propose to change the current wording.

There is an equivalent requirement for electric distribution utilities. *See* Ohio Admin. Code Rule 4901:1-10-24(F)(4). The Commission is reviewing that rule in *In the Matter of the Commission’s Review of Chapter 4901:1-10 of the Ohio Administrative Code*, Case No. 17-1842-EL-ORD. Staff, however, proposed different language for this same kind of notice in that docket. It is unclear why Staff is not proposing consistent language for Proposed Rule 13-12(F)(4). Because the circumstances are so similar, RESA would not object to the rules being more consistent as follows:

(3) Prior to issuing any eligible-customer lists and at least four times per calendar year, provide all customers clear written notice, in billing statements or other communications, of their right to object to being included on such lists. Such notice shall include instructions for reporting such objection. This notice shall read as follows: “We are required to include your name, address, ~~and~~ usage information, ~~and other customer specific information as identified on the approved eligible-customer list displayed on our website and tariffs,~~ on a list of eligible customers that is made available to other retail natural gas service suppliers or governmental aggregators. If you do not wish to be included on this list, please call \_\_\_\_\_ or write \_\_\_\_\_, or complete the appropriate form

on \_\_\_\_\_ website. If you have previously made a similar election, your name will continue to be excluded from the list without any additional action on your part. If you previously decided not to be included on the list and would like to reverse that decision, please call or write us at the same telephone number and address. An election not to be included on this list will not prevent \_\_\_\_\_ from providing your information to governmental aggregators.”

In addition, the gas or natural gas company may offer its customers the option of contacting the gas or natural gas company by electronic means and, if it does so, the gas or natural gas company shall add its electronic mail address or web site to the above notice. The list of customer specific information listed on the eligible-customer list shall be displayed in an easily accessible place on each utility’s website for customers to view.

**E. Proposed Rule 4901:1-13-12(G), Account Block to Prevent Switches**

The Staff proposes to require the LDC to allow any customer to add a “block” to their natural gas accounts to prevent being switched without the customer first providing a special code or pin number. Specifically, Staff proposes:

(G) Each gas or natural gas company will allow any customer to request a retail natural gas supplier block be placed on the customer’s account. The block will prevent the customer’s commodity service provider from being switched without the customer’s authorization (via customer provided code or pin number) to the gas or natural gas company. The release will be provided to the gas or natural gas company from the customer or other authorized person on the account.

The Commission should not accept Staff’s proposed rule. First, Ohio law already “blocks” any change in a natural gas supplier without the customer’s consent. Ohio Revised Code Section 4929.22(D)(3) states that the Commission shall adopt rules that “prohibit against switching, or authorizing the switching of, a customer’s supplier of competitive retail natural gas service without the prior consent of the customer in accordance with appropriate confirmation practices, which may include independent, third-party verification procedures.” The Commission did that and incorporated numerous safeguards that not only protect customers

against slamming, but also make customers whole if slamming is found to have occurred. *See* Ohio Admin. Code Rules 4901:1-29-06(B)-(E) and 4901:1-29-08(D).

Second, the proposed rule would be confusing and burdensome to customers. The current rules require the CRNGS Suppliers to inform customers that the account information may not be disclosed and that their supplier cannot be changed without the customer's affirmative consent.<sup>6</sup> Staff's Proposed Rule 4901:1-13-12(G) would "allow any customer to request a retail natural gas supplier block be placed on the customer's account." These rules tell customers that their supplier cannot be switched without their consent and at the same time, tell them that they may block their account to prevent unauthorized switching. Customers could be led to believe that if *they* do not set up the block, their supplier could be changed without their consent. Customers may also erroneously believe that requesting a block on their account removes them from the eligible-customer list and prevents them from receiving CRNGS supplier marketing, neither of which is true.

Third, the proposed rule would easily lead to customer frustration when customers forget or lose their pin numbers to remove the block. The use of a code or pin number is simply another layer of information that the customer will have to retain and could easily lose or forget. In addition, the LDCs will need to develop procedures to verify the identity of the customers who forget their credentials, which again is very likely to occur and occur frequently. While the block may be intended to protect certain customers, it will lead to more harm and frustration than good.

Lastly, while RESA agrees that customers' suppliers should not be changed without consent, no evidence or data indicates that the existing rules are inadequate. As a result and for

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<sup>6</sup> *See* Ohio Admin. Code Rule 4901:1-13-29-11(S).

all of the above reasons, the Commission should not accept Staff's Proposed Rule 4901:1-13-12(G). RESA further notes that rejection of this proposal also necessitates removal of the reference to it in Proposed Rule 4901:1-13-06(C)(8).

**F. Proposed Rule 4901:1-13-12(H), Advising Customers Who Move**

Staff proposes the following new provision for Rule 4901:1-13-12:

(H) Any gas or natural gas company that provides for competitive retail natural gas service contract portability between premises will advise a customer at the time of a move request that the customer's natural gas supply is currently served by (the name of the supplier) and that the current supplier will transfer to the customer's new premise under the same terms and conditions. The gas or natural gas company will also advise the customer of its choice program and the commission's energy choice website. Account numbers will be transferred to competitive retail natural gas suppliers as part of operational need once notification is provided to customers.

This proposed rule is problematic for two reasons. First, the LDC should not be "advising" the customer of what to do or not do relative to services that the LDC does not provide. Rather, the LDC should simply inform the customer of the name of the customer's current natural gas supplier and tell the customer that the current supplier will transfer to the new premise under the same terms and conditions. Second, the LDC's role is not to offer advice about the competitive market. By mandating that the LDC provide advice about the choice program and the energy choice website, the proposed rule is risking a situation where the LDC would be encouraging customers to breach their existing supply contracts.

RESA, however, understands that customers may want to know more about how the move might impact their natural gas service and thus ask the LDC's representative for further information. RESA would not object to the Commission providing guidelines in the rule to

assist the LDCs in responding. To that end, RESA recommends that at a minimum, the proposed rule be revised to read:

(H) Any gas or natural gas company that provides competitive retail nature gas service contract portability between premises will advise a customer at the time of a move request that the customer's natural gas supply is currently served by (the name of the supplier) and that the current supplier will transfer to the customer's new premise under the same terms and conditions. If the customer asks the gas or natural gas company for further information about the supplier's service, the gas or natural gas company will either transfer the customer to the supplier or give the customer the supplier's contact number. If the customer asks the gas or natural gas company for further information about other supply options, the gas or natural gas company will also advise the customer of its choice program and provide the customer with the commission's energy choice website address. Account numbers will be transferred to competitive retail natural gas suppliers as part of operational need once notification is provided to customers.

**G. Proposed Rules 4901:1-13-14(B) and (C), Supplier Agreements and Eligible-Customer List Information included in the LDC Tariffs**

The Staff proposes new language for Rules 4901:1-13-14(B) and (C) to require the LDC's tariffs to include the LDC's current supplier agreement and a list of all information on an LDC's eligible-customer list. RESA interprets the reference to the supplier agreement to be the LDC's form agreement (not actual signed/executed agreements) and supports it with that clarification.<sup>7</sup> RESA also supports inclusion of the eligible-customer list information. These additional requirements will provide greater transparency and easier accessibility to important information for the market participants.

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<sup>7</sup> RESA notes that Dominion and Duke already include form supplier agreements in their tariffs. See Dominion Tariff Sheet ECPS 57-60 and Duke Tariff, PUCO Gas No. 18, Sheet 44, Addendum.

#### **H. Proposed Rule 4901:1-13-14(D), Coordinating Customer Enrollments**

The Staff proposes to reword Rule 4901:1-13-14(D) to require the LDCs to coordinate with the CRNGS suppliers per Ohio Administrative Code Chapter 13 only. The specific language change as proposed by Staff is:

(D) The gas or natural gas company shall coordinate customer enrollment with the retail natural gas supplier and governmental aggregator ~~in accordance with the procedures set forth in rule 4901:1-29-06 of the Administrative Code, as set forth in this chapter.~~

Rather than limit customer enrollment requirements to only that required in Chapter 13 (and thus ignoring the procedures that continue to exist in Rule 4901:1-29-06), the rule can be modified such that the gas or natural gas company must comply with all applicable requirements. Specifically, RESA recommends that the rule be modified instead as follows:

(D) The gas or natural gas company shall coordinate customer enrollment with the retail natural gas supplier and governmental aggregator ~~in accordance with the procedures set forth in rule 4901:1-29-06 of the Administrative Code~~ in compliance with all applicable requirements.

RESA's proposed language will ensure that the necessary requirements – whether now or later located in Chapter 13, the Ohio Revised Code, or another Administrative Code chapter – are still part of the coordination obligations.

#### **I. Proposed Rule 4901:1-13-14(J), Automatic Process for Termination or Suspension from LDC Choice Program**

In new proposed paragraph (J) of Rule 4901:1-13-14, Staff proposes adding the language from paragraph (F) of Rule 4901:1-27-13 rather than simply referencing the rule citation as done in the existing rule language. The language from paragraph (F) of Rule 4901:1-27-13 provides a process by which a gas or natural gas company can file a request with the Commission for the suspension or termination of a supplier's participation in a supplier program upon a default by the supplier. RESA is indifferent on the relocation of the language but is concerned that the

language continues to allow an automatic suspension or termination if the Commission or attorney examiner does not act within a certain time period. The automatic process is problematic because it is an inflexible, highly expedited process that does not take into consideration commercially reasonable and common opportunities, such as:

- An option for the CRNGS supplier to cure the alleged material default.
- An option for the LDC and CRNGS supplier to meet and discuss in good faith the alleged material default or the proposed remedy.
- An option to respond to the LDC's filing at the Commission.
- Reasonable review periods. Depending on the issue(s) involved, documentation needed, etc., review periods of ten-business days and five-business days may be unrealistic for the Commission to learn the facts, review documentation, analyze the law and reach a conclusion.

Also concerning is that the LDC has wide latitude to find a "material default" and trigger the automatic process because some LDC tariffs would allow a default to be *any* failure to comply with the tariff. That latitude exists in Columbia's tariff, for example:

A Retail Natural Gas Supplier is in default of its obligations under Columbia's Customer CHOICE<sup>SM</sup> Program if any of the following occur:

- a) The failure, potential failure or anticipated failure of the Retail Natural Gas Supplier, to deliver volumes of gas to the Company in accordance with the Company's tariff or related agreements.
- b) Failure to pay Company amounts due under the Company's tariff.
- c) The failure to maintain Requirements for Program Participation, including the provision of financial security instruments, pursuant to the Company's tariff at the time of determination.
- d) Retail Natural Gas Supplier's voluntary filing of a bankruptcy petition, or the filing of involuntary bankruptcy petition by the Supplier's creditors.
- e) A Retail Natural Gas Supplier's violation of the Code of Conduct provisions of the Company's tariff.
- f) A reasonable determination, after investigation, that the Retail Natural Gas Supplier is not operating under the Company's tariff in an ethical or legal manner. Such determination may be made based on a customer complaint; the Company's own investigation; or a Retail Natural Gas Supplier's admission.
- g) To the extent not specifically identified above, the failure of the Supplier to perform any of the obligations imposed under the Company's tariff.

See Columbia Tariff PUCO No. 2, Section VII, Sheet 24, ¶24.1. Dominion's tariff is similar. See Dominion Tariff, Sheet No. ECPS 51.

The fact that the Commission has no equivalent automatic process in the EDU rules<sup>8</sup> is an additional basis for the Commission to reconsider the need for the restrictive LDC process, and craft a process that would be more fair and useful if a material default occurs. It is noteworthy as well that Staff did not propose an automatic process for material defaults by competitive retail electric service providers in the Commission's pending review of those similar rules. See *Review of Chapter 4901:1-10, supra*, Entry at Attachment A (July 17, 2019).

To address the concerns with Staff's proposal, RESA recommends the following revisions to Paragraph J of the Rule:

(J) In the event of a material default, as defined by a gas or natural gas company's tariff or by an agreement between the gas or natural gas company and the retail natural gas supplier or governmental aggregator, ~~the gas or natural gas company shall follow the provisions of paragraph (F) of rule 4901:1-27-13 of the Administrative Code.:~~

(1) The gas or natural gas company will serve a written notice of such default in reasonable detail and with a proposed remedy to the retail natural gas supplier or governmental aggregator and the commission.

The gas or natural gas company will send notices pursuant to this paragraph by electronic mail, fax, overnight mail, or hand delivery to the commission and staff at the commission's offices. The gas or natural gas company will notify all commissioners, the chief of staff, the director of the service monitoring and enforcement department, the director of the rates and analysis department, the director of the legal department, and the chief of the attorney general's public utilities section. The gas or natural gas company will send the notice to the address, electronic mail, and fax number provided by the retail natural gas supplier or governmental aggregator in its aggregation agreement.

(2) Within three business days of the date the notice was sent, the retail natural gas supplier or governmental aggregator may request to meet and discuss in good faith the alleged material default or the proposed remedy.

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<sup>8</sup> See Ohio Admin. Code Rule 4901:1-24-14.

(3) In the event the gas or natural gas company and the retail natural gas supplier or governmental aggregator do not reach an amicable resolution of the issues associated with the alleged material default, the gas or natural gas company may file an application with the commission that requests authorization to terminate or suspend the retail natural gas supplier or governmental aggregator from participation with the gas or natural gas company's supplier program.

The retail natural gas supplier or governmental aggregator shall file a written response to the application within five business days.

(4) The commission or an attorney examiner will issue a procedural schedule that allows for a prompt and expeditious review and decision by the commission.

**J. Commission must comply with Ohio Revised Code Section 121.95**

The Commission must review the new regulatory restrictions proposed by Staff to ensure compliance with Ohio Revised Code Section 121.95(F). That statute was recently enacted and states:

Beginning on the effective date of this section and ending on June 30, 2023, a state agency may not adopt a new regulatory restriction unless it simultaneously removes two or more other existing regulatory restrictions. The state agency may not satisfy this section by merging two or more existing regulatory restrictions into a single surviving regulatory restriction.

This statutory mandate applies to the Commission per Ohio Revised Code Section 121.95(A).

Staff's proposals, including many addressed above, contain regulatory restrictions as demonstrated by their use of the words "shall," "must," and "require." The Commission should not proceed to adopt Staff's proposals without also removing regulatory restrictions as required by this statute.

### III. CONCLUSION

RESA appreciates the opportunity to provide these comments in the PUCO's review of its Minimum Gas Service Standards rules. As long-time active industry participants, RESA members are affected by the rules today and will be affected by a number of the Staff's proposed changes in this proceeding. RESA urges the Commission to adopt the changes identified in these Initial Comments.

Respectfully submitted,

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**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 will be served (via electronic mail) on all parties who have or will be submitting initial comments in Case No. 19-1429-GA-ORD this 17<sup>th</sup> day of January 2020, or shortly thereafter when the identity of such commenter is known.

/s/ Gretchen L. Petrucci \_\_\_\_\_  
Gretchen L. Petrucci