



November 5, 2025
Before the House Energy Committee
Opponent Testimony on House Bill 427

Chairman Holmes, Vice Chair Mathews, Ranking Member Rader and House Energy committee members, my name is Frank Strigari. Thank you for allowing me to provide opposition testimony to House Bill 427.

The as-introduced legislation, which AEP Ohio continues to support, would allow us to build upon our existing, PUCO-approved voluntary demand-response pilot program for residential customers. Last week however the bill was amended with a problematic “Consumer Choice Billing Amendment”, which now causes AEP Ohio to oppose the current legislation.

There are significant, unanswered questions on how a competitive retail electric service provider (CRES) consolidated billing regime would be implemented. For example, how would a utility’s current ability to disconnect for non-payment work under the CRES consolidated billing scheme? How would the partial payment priority rules, which were written with utility consolidated billing in mind, work under this amendment? These questions are further complicated by the ability of the CRES to elect whether or not to do consolidated billing at all with no input from the utility.

This amendment will increase customer confusion, decrease transparency, and create numerous unresolved issues through a hodgepodge of costly billing approaches. The amendment is also one-sided and imposes obligations and restrictions on utilities while allowing the CRES maximum flexibility.

As the committee can see, there are numerous issues that this amendment fails to account for, and, respectfully, AEP Ohio believes that demand-response legislation is not the appropriate venue for the nuances of customer billing. Instead, AEP Ohio urges committee members to remove the amendment from this bill and work with all interested parties, including AEP Ohio, on a potential path forward for any changes to utility billing.

While our testimony focuses primarily on billing, the committee also adopted an amendment to HB 427 that weakens our ability to offer comprehensive demand-response programs, and we look forward to addressing this issue more in-depth.

Thank you very much for the opportunity to testify, and I am happy to answer any questions.