



**Office of the Ohio
Consumers' Counsel**
"Your Residential Utility Consumer Advocate"
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Maureen Willis
Ohio Consumers' Counsel

Michael Watkins
Board Chair

**Before
The Ohio House of Representatives
Energy Committee**

**Testimony on Sub. House Bill 173
(Regards Entities Providing Behind-the-Meter Utility Services)**

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**On Behalf of
Office of the Ohio Consumers' Counsel**

November 12, 2025

Chair Holmes, Vice-Chair Mathews, Ranking Member Rader, and Committee Members.

Thank you for the opportunity to testify today on Sub. House Bill 173 as a proponent. My name is Beau Euton, and I am testifying on behalf of the Ohio Consumers' Counsel (OCC), who represents Ohio's 4.5 million residential utility consumers.

OCC appreciates the opportunity to work with the bill's sponsor, Representative Thomas. We thank the Representative, along with Representatives Fischer and Brennan, for their accessibility, thoughtful engagement, and genuine interest in addressing concerns of residential consumers. We value the collaboration and their commitment to protecting consumers who receive behind-the-meter utility service.

The amendments to Sub. House Bill 173 reflect meaningful and positive changes for consumers. OCC particularly appreciates that the bill now:

- Requires behind-the-meter utility service providers to inform consumers about billing assistance programs (Lines 236-239);
- Requires those providers to offer tenants an alternative payment plan (Lines 245-247);
- Ensures providers accept payments from the home energy assistance program (HEAP) when the account holder qualifies (Lines 248-250);
- Requires bills to clearly itemize charges and fees, including any common area charges (Lines 251-265);
- Extends the timeline for the PUCO to adopt rules regarding interim compliance plans allowing for a more inclusive process and robust stakeholder input (Lines 370-372); and

- Requires the PUCO to submit a report to the General Assembly with detailed information about those registered to provide behind-the-meter service (Lines 565-582).

These additions go a long way toward protecting consumers who receive essential utility services through behind-the-meter arrangements.

OCC looks forward to continuing to work with the bill sponsor, committee members and stakeholders to strengthen consumer protections for this growing segment of Ohioans.

The Ohio Consumer's Counsel also appreciates the General Assembly's longstanding leadership in promoting utility affordability, including its creation of the Percentage of Income Payment Plan Plus (PIPP Plus) program to help low-income households maintain essential service. Building on that leadership, OCC recommends that Sub. House Bill 173 include a provision requiring submetering entities to comply with the PIPP Plus program. Specifically, submetering entities should be required to allow eligible low-income residents to enroll in and receive the same benefits and protections under PIPP Plus as customers of regulated utilities.

OCC thanks Representatives Thomas, Fischer, and Brennan, as well as Chair Holmes and this Committee, for their leadership, collaboration, and attention to consumer protection. The amendments to Sub. House Bill 173 represent an important step toward ensuring that consumers of behind-the-meter service providers receive protections comparable to those of consumers served directly by PUCO-regulated utilities.

Thank you for the opportunity to testify.