

**Testimony On HB 173**  
**Before the House Energy Committee**  
**Wednesday, November 12, 2025**  
**Submitted by Janine Migden-Ostrander**

Chair Holmes, Vice Chair Mathews, Ranking Member Rader, and Members of the Committee:

My name is Janine Migden-Ostrander, an Ohio resident and I thank you for the opportunity to provide testimony regarding HB 173 as an interested party. I have worked for over 4 decades as a consumer and environmental advocate on energy issues, including serving as Ohio's Consumers' Counsel from 2004 – 2011 and as a Principal for the Regulatory Assistance Project from 2011 - 2022.

HB 173 would correct an ongoing problem in which some landlords in trailer parks and tenements submeter the electric and water usage and then charge the tenants a higher price for these services than what those customers would have paid if they had access to service directly from the utility itself. These entities are unregulated and they take advantage of vulnerable customers.

Because these submetering entities are not regulated, not only are disadvantaged customers subject to higher rates than their nearby neighbors, but they also do not have consumer protections or access to the Percentage Income Payment Plan (PIPP). The Percentage of Income pay allows customers at or below 150% of the Federal Poverty Guideline (FPG) to pay 5% of their gross income for electric service and 5% for gas as opposed to paying the entire bill.

This Bill would prohibit the landlords from increasing the price for electricity and water above what the regulated utility charges. It would also allow sub-metered customers to participate in the Home Energy Assistance Program (HEAP) which provides financial assistance for qualifying low-income customers (those with incomes at 150% or less of the Federal Poverty Guideline (FPG). These are positive attributes that represent important progress to protect consumers.

In passing HB 173, I would urge you to add the following:

- Include language allowing sub-metered customers to be eligible for PIPP so they have the same opportunities as all other customers.
- Require that the Office of the Consumers' Counsel be served with copies of any complaint filed at the PUCO so they can monitor the submetering industry to identify if there are patterns of abuse.

- Consider regulating sub-metering companies in a manner similar to retail electric service providers.

Thank you for your consideration of my testimony.

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