



**Office of the Ohio
Consumers' Counsel**
"Your Residential Utility Consumer Advocate"
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**Before
The Ohio House of Representatives
Energy Committee**

**Testimony on Sub. House Bill 173
(Regarding Entities Providing Submetered Utility Services)**

Angela O'Brien, Deputy Consumers' Counsel

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

February 25, 2026

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

My name is Angela O'Brien. I serve as the Deputy Consumers' Counsel for the Office of the Ohio Consumers' Counsel (OCC), the state agency that represents the interests of Ohio's 4.5 million residential utility consumers. OCC appreciates the opportunity to provide proponent testimony in support of Amended Sub. House Bill 173.

OCC is grateful for the collaboration with the bill's sponsor, Representative Thomas, as well as Representatives Fischer and Brennan. We thank the Representatives for working with OCC to develop thoughtful legislative solutions that provide protections for residential consumers receiving submetered utility service. We also appreciate this Committee's continued commitment to transparency, fairness, and meaningful consumer protection.

Amended Sub. House Bill 173 includes important safeguards for submetered consumers. To begin, OCC appreciates the amendment replacing references to "behind the meter" utility service with the clearer and more accurate term "submetered" utility service. Using plain and transparent language helps ensure that consumers understand how they are billed and what protections apply to them.

In addition, the amended bill retains several key consumer protections including:

- Limiting charges for submetered electric utility service to no more than the bill for the standard service offer and all tariffed charges and riders (Lines 206-212);
- Requiring submetered service providers to inform consumers about available billing assistance programs (Lines 236-239);

- Requiring submetered service providers to offer tenants an alternative payment plan (Lines 245-247);
- Requiring acceptance of payments from the Home Energy Assistance Program (HEAP) when the account holder qualifies (Lines 248-250);
- Requiring clear itemization of charges and fees on bills, including any common area charges (Lines 251-265).

Amended Sub. House Bill 173 also requires submetered utility service providers serving larger communities (those with more than 50 units) to file compliance plans with, and obtain approval from, the Public Utilities Commission of Ohio (PUCO). This oversight will help protect consumers living in large multi-family properties from potential exploitation by third-party submetering companies and promote accountability and transparency.

While OCC strongly supports the progress reflected in this legislation, we continue to recommend that eligible low-income residents be allowed to enroll in and receive the benefits and protections available through Ohio's Percentage of Income Payment Plan Plus (PIPP Plus) program. OCC will continue to look for avenues to achieve this going forward.

OCC again thanks Representatives Thomas, Fischer, and Brennan, as well as Chair Holmes and the members of this Committee, for their leadership, collaboration, and dedication to protecting Ohio's residential utility consumers.

Thank you for the opportunity to testify.