

**ECONOMIC GROWTH THROUGH COMPETITIVE ENERGY MARKETS
COALITION**

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RECEIVED

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

June 13, 2005

*PWC Properties
Managers of the
Parkway Center
Office Complex*

**RE: Notice of Proposed Rulemaking RE Electric Distribution Companies' Obligation
to Serve Retail Customers at the Conclusion of the Transition Period**
Docket Number L- 00040169

Chairman Holland and Commission:

*Ross Park Mall
Premier Shopping
Center Located
North of Pittsburgh*

The following comments are filed in response to the announcement of proposed rulemaking made in the February 26, 2005 Pennsylvania Bulletin (35 Pa.B.9) by the Economic Growth through Competitive Energy Markets Coalition.

*SMC Business
Councils
Representing
Thousands of Small
Western and Central
Pennsylvania
Businesses*

The Economic Growth through Competitive Energy Markets Coalition -- known as CEM -- represents thousands of small business electricity consumers and several large institutional consumers interested in achieving an enhanced competitive electricity market in Pennsylvania. Formed in June of 2004, CEM members identified three principles that should define efficient and effective competitive energy markets. CEM's first principle focuses on job growth. According to U.S. Bureau of Labor Statistics, the vast majority of the more than 6 million individuals employed in the Commonwealth work for light industrial, commercial and small service industry firms. Every dollar spent on inefficient energy costs is a dollar unavailable for job growth and business development. CEM's second principle notes effective retail energy competition provides customers with real choice. Experience in other states demonstrates that fair and consumer focused retail electric competition rules bring business consumers options by giving them the opportunity to choose among many electricity suppliers, product offerings and supply sources, including renewable sources. CEM's third principle calls on the Pennsylvania Public Utility Commission (Commission) to set retail electric competition rules that are fair for all consumers, regardless of their size, level of consumption, or market knowledge.

*West Penn Hospital
Member of the West
Penn Allegheny
Health System*

As you may recall, CEM appeared before the Commission as part of the June 2004 public input session, and presented these principles in detail. At that time we concluded our presentation by stating that an enhanced competitive retail marketplace for all consumers will result in the best possible electricity price, offer a range of choices that customers want, and contribute to an improved climate for business development and job growth in the Commonwealth.

*World Class
Processing Corp.
Providing Steel
Pickling and Slitting
Services to the Steel
Manufacturing
Industry*

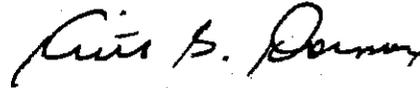
CEM believes that the Commission's proposed Generic Default Service rule would enhance Pennsylvania's competitive retail electricity market.

In particular, CEM supports provisions of the proposed Generic Default Service rule that prevent restrictions on the ability of customers to move from default service to competitive service through use of such mechanisms as minimum stay provisions and switching fees. CEM encourages the Commission to review the comments made by market participants in this rulemaking and make any changes the Commission finds necessary to ensure that other barriers to new market entry likewise are not erected. Additionally, CEM believes that any procurement mechanism that is demonstrably unsuccessful in bringing meaningful choices to consumers should be rejected and that any changes that would allow the procurement processes to encourage healthy, vibrant and ongoing opportunities for robust competition should be adopted.

CEM believes that competitive markets bring business consumers benefits by giving them the opportunity to choose among many electricity suppliers, product offerings and supply sources. CEM members desire an enhanced competitive retail energy market in Pennsylvania. In our opinion, the Commission's proposed Generic Default Service rule has the opportunity to enhance the competitive retail electric energy market in Pennsylvania. In our view, only an enhanced competitive retail electric energy market will provide real choice in retail electric energy providers, which in turn will lead to business consumers receiving the best prices today, and in the future.

We would be pleased to answer any questions you may have concerning this submission.

Sincerely



Keith G. Dorman
Coordinator