

PA Retail Market Investigation
Supplier of First Resort
EDC Marketing Policies & Information
September 30, 2011 Status Report

Sub-Group Members – Direct Energy, First Energy (on behalf of PPL, PECO, Duquesne), First Energy Solutions

Prioritized Supplier Issues	Status	First Energy	PECO	PPL	Duquesne	Recommendations/Best Practices
Automatic assignment of customer to default service (new or moved customer)	Being address by another subgroup (if not should be high priority)	<ul style="list-style-type: none"> ❖ Minimum of 1 month on default service ❖ FE is working with EGSs to determine if, how, over what timeframe, and at what cost our systems could be modified to accommodate a change to this requirement. 	<ul style="list-style-type: none"> ❖ Minimum of one month on Default Service 	<ul style="list-style-type: none"> ❖ When a new service is established, or a new ratepayer moves into an existing premise, an account number is created. Electricity will begin flowing as soon as service work (if any is required) is complete. Once the account number is established, the customer may shop for and engage an EGS. In accordance with Commission regulations, generation service from the EGS will begin following the next scheduled meter read consistent with the confirmation requirements (16-day rule). 	<ul style="list-style-type: none"> ❖ Minimum of 1 month on default service ❖ Mover’s Guide is provided to customer with shopping options. 	<ul style="list-style-type: none"> ❖ Policy / Systems issue. Park with new mover / referral work group. This issue is being addressed by the new mover subgroup.
EGSs Data Request / Security vs Affiliated EGS suppliers	Being addressed by another subgroup	<ul style="list-style-type: none"> ❖ Same procedure for affiliates as for unaffiliated suppliers –all have access to 	<ul style="list-style-type: none"> ❖ PECO treats all suppliers the same (affiliate or otherwise). PECO 	<ul style="list-style-type: none"> ❖ PPL Electric treats all EGSs, including its affiliated EGS, on a comparable basis 	<ul style="list-style-type: none"> ❖ Same procedure for affiliates as for unaffiliated suppliers. All treated the same. 	<ul style="list-style-type: none"> ❖ Park - this issue should be referred to affiliate rules and code of conduct proceeding

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		supplier support website.	follows a strict Standards of Conduct policy that will not allow the treatment of affiliates different than other EGSs.	with regard to the availability of customer data.	All have access to customer website.	
Eligibility of CAP, LIHEAP customers to enroll with competitive suppliers	Being addressed by another sub-group	<ul style="list-style-type: none"> ❖ <u>Met-Ed, Penelec and Penn Power:</u> Currently, CAP & LIHEAP benefits are provided equally to shopping and non-shopping customers ❖ West Penn: At the present time, LIPURP customers are not able to shop due to the need for system changes. They will be able to shop upon full implementation of SAP 	<ul style="list-style-type: none"> ❖ By PUC regulation (is this a PUC regulation or a settlement provision), PECO does not allow CAP customers to choose an EGS. 	<ul style="list-style-type: none"> ❖ PPL Electric CAP and LIHEAP customers can take service from EGSs. 	<ul style="list-style-type: none"> ❖ Yes, CAP customers can shop if the switch to an EGS results in the least overall cost. 	<ul style="list-style-type: none"> ❖ PA PUC policy decision, utilities handle differently, goal recommendation is that no one should be preclude from competitive offerings. May need to be addressed by the universal service sub-group.
Automatic reassignment of customer to default service when there is a change to customer's service (moves, name change, tax ID change, etc)	High	<ul style="list-style-type: none"> ❖ Customer dropped with change in either premise number or tax ID number. ❖ FE is working with EGSs to determine if, how, over what 	<ul style="list-style-type: none"> ❖ Supplier drop, customer call to rescind/return to PECO, customer move, name change causing the customer to get a new account 	<ul style="list-style-type: none"> ❖ In general, changes in a customer's service that require the establishment of a new account number will end the EGS relationship and 	<ul style="list-style-type: none"> ❖ If name change with the same Tax ID, then no reassignment. If name change with a new Tax ID, then go to default service until customer elects to 	<ul style="list-style-type: none"> ❖ Duquesne process appears to be the least restrictive. Can the other EDC's adjust there is systems to match Duquesne's process

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		<p>timeframe, and at what cost our systems could be modified to accommodate a change to this requirement.</p> <p>❖ <u>Drop Requests:</u></p> <ol style="list-style-type: none"> 1. Customer dropped 10 days following termination for non-payment and account is finalized; 2. customer moved or account closed; 3. dropped by customer request; 4. customer changed to another service provider; 5. withdrawn; 6. alleged slam <p>❖ <u>Rejection Reasons:</u></p> <ol style="list-style-type: none"> 1. Account exists but is not 	<p>number, new service Installed at premise, certain rate changes (CAP, etc.)</p>	<p>require the customer to re-enroll with the EGS (or other EGS) at the new account number. All normal enrollment rules (10-day letter, 16-day rule, etc.) apply. In the case of a bankruptcy, however, the Company will, via a manual process, associate the EGS with the new account.</p>	<p>switch. Basis is whether there is a new account.</p>	

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		active; 2. move pending; 3. account not found; 4. duplicate request received; 5. action code invalid; 6. account not eligible; 7. service provider not licensed to provide requested service; 8. required information missing; 9. customer name is missing from the request; 10. date/time invalid or missing; 11. incorrect billing option requested; 12. incorrect billing calculation				

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		method requested; 13. bill option not valid for this type of account; 14. maintenance type code invalid; 15. EGS not certified to provide requested bill option; 16. customer not eligible for requested bill option; 17. not last in; 18. participating interest invalid; 19. service does not exist; 20. tax exemption percentage invalid; 21. cannot identify EGS; 22. cannot identify EDC; 23. requested rate				

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		not found or not in effect on the requested date; 24. currently enrolled				
Utility rates listed first on PA Power Switch website	High	❖ The formatting of the PA Power Switch website has been determined by the PUC.	❖ Currently, ALL EDC Default Rates are automatically first on the PA Power Switch website. This is how PA Power Switch is formatted.	❖ The formatting of the PAMPowerSwitch website has been determined by the PUC. PPL Electric is concerned that any changes to the PAMPowerSwitch website also consider consumer education objectives. PPL Electric (and likely other EDCs) routinely refers customers to the PAMPowerSwitch website and website content and PPL Electric scripting must be aligned.	❖ Duquesne does not control PA Power Switch. May be placed first on the list for PTC purposes.	❖ PA PUC issue, possible solutions include omitting the default service rate, displaying the default service rate last, and displaying it in either alphabetical or random order. NYPSC omits the default service rate on its shopping website, still investigating other PUC's websites. Short term recommendation is to display utility default service rate last on PA PUC website. Longer term recommendation is to omit the default service price completely.
EGS receives enrollment data and validates utility data in regards to dual billing: a. Customer is notified	High	❖ When a supplier sends in an enrollment for dual billing, they send in an 814 enrollment and SAP accepts that	❖ PECO no longer initiates a switch to dual billing. A switch to dual billing can only be initiated	❖ (Response to a): With the implementation of a Purchase of Receivables (POR) program for the	❖ A Form 814 change is submitted to change a billing option. This comes from the supplier, not the EDC.	❖ Communication enhancements needed between EDCs and EGSs. Also need to review further to identify best practice.

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<p>that the account will be split/ (what would be helpful is that the EGS is notified directly as well of the splitting of accounts and if there is going to be a delay in terms of meter cycle date at that time/ supply start is directly communicated with the EGS if outside of normal window)</p> <p>b. EGS submits accounts for enrollments</p> <p>c. Utility responds</p> <p style="padding-left: 20px;">i. Some accounts accepted and read cycle given</p> <p style="padding-left: 20px;">ii. Some reject no start no cycle and no reason given</p> <p>d. Rejected accounts resubmitted and accepted (no reason given to the EGS)</p>		<p>enrollment and sends an 814 response to the supplier. After that transaction, the account is set up with dual billing in our system and the customer starts service on the next meter read.</p> <ul style="list-style-type: none"> ❖ SAP generates a Dual Billing Enrollment Letter ❖ The only reason we wouldn't accept the enrollment is due to the reasons listed in FE's response to #3, above, but these are NOT specific to dual billing. Any enrollment may be rejected for these reasons. ❖ We have had no complaints about dual billing rejections. ❖ West Penn presently is unable to provide read cycle dates for our 	<p>by supplier request.</p>	<p>Residential and Small C & I customer classes in 2010, PPL Electric reverts only Large C & I customers who are 60-days in arrears to dual billing. If this step is necessary, PPL Electric will inform the customer and his/her EGS, and then process an 814 Change to indicate a change in billing type from 1-bill to 2-bill.</p> <ul style="list-style-type: none"> ❖ (Response to b, c, d): Pursuant to EDEWG rules, PPL Electric responds to all enrollments with an enrollment response. The enrollment response contains a start date and a bill cycle indicator. PPL Electric does not reject enrollments that are within the 16-day window, they 	<p>If we reject any enrollment, we always provide a reason. We use the EDEWG standards.</p>	

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		<p>power billing accounts in PA. We do provide them to suppliers by means of email if requested. All other accounts we do not provide the read cycle – it is embedded within the account number. If the account rejected you would not receive a start date. We are not aware of any rejections that are sent back with no reason. We have had occasions where some suppliers do not understand our rejection reasons. Issues will be addressed by April / June 2012 via SAP Platform integration.</p>		<p>are accepted and simply given the next available start date for the particular bill cycle consistent with the 16-day rule. If an enrollment is rejected, the response will indicate a reason code.</p>		
<p>Utility copy of customer bill. The supplier should be allowed to receive or download an image of</p>	<p>High</p>	<p>❖ FE supplies “example bills” on the FE supplier website but does not supply EGSs with actual customer</p>	<p>❖ PECO supplies “example bills” on the SUCCESS Website. If EGS requests customer</p>	<p>❖ PPL Electric maintains sample bills on its web site that are available to customers, EGSs and</p>	<p>❖ Duquesne supplies sample bills on its Supplier Website ❖ Duquesne does not supply EGSs with</p>	<p>❖ EGS can receive a copy of the customer specific bill the IA affirmative consent for LOA from customer. ❖ Ensure EDC’s make available a</p>

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<p>our customer’s bills (in its entirety) upon request. Currently they only send us images of sections with our charges and claim the rest of the information is private. We need to better show our customers how our charges will appear on the customers invoices. If the customer are being served by us, and we are calculating the billing, which other private information in the bill should not be visible to us?</p>		<p>bills ❖ If EGS wants customer bill, the customer may call the Customer Contact Center and request the bill themselves</p>	<p>bill, it is the customer’s responsibility to call the Customer Care Center and request the bill themselves. PECO does not supply EGSs with a full image of customer bills due to privacy issues.</p>	<p>others to aid them in understanding charges for electric service. PPL Electric is willing to work with any EGS to help foster understanding and consumer education, but does not have the capability to print individual monthly bills or provide copies of those bills to EGSs.</p>	<p>customer bills due to confidential information on credit, payment history, and other matters on the bill.</p>	<p>sample bill(s) and make them easily accessible. ❖ EDC’s should update sample bills on a timely basis. ❖ Sample bills should include one displaying utility provided default service, the second bill sample should be one that displays utility consolidated bill on behalf of an EGS, and the third sample bill should display dual billing, displaying only the utility TND portion of the bill.</p>
<p>Net Meter Identifier for all utilities. We know this is a work in progress with the utilities, but we need to have a net meter customer identifier in the enrolment response, historical usage, and monthly usage and change transactions.</p>	<p>High</p>	<p>❖ Currently do not identify net metering, however FE has the ability and willingness to do so, at the next opportunity to modify the SAP system.</p>	<p>❖ PECO is in the process of implementing a Net Metering identifier on the Eligible Customer List (ECL). No identifier is sent in enrollment response or other EDI transactions.</p>	<p>❖ PPL Electric is currently testing changes (approved by the EDEWG) to the 814 and 867 transactions to include an identifier to indicate the presence of net metering. These are scheduled to be</p>	<p>❖ Currently do not identify net metering ❖ This is an action item for CHARGE. Duquesne does email the EGSs a list of their customers who are on net metering, but that the information is not provided via EDI as it is not required per</p>	<p>❖ Each EDC implements a NMI by date certain. ❖ If this cannot be accomplished in the short term than a manual/other process is needed.</p>

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<p>PPL and Duquesne are sending emailing us net meter customers' account, but this does not allowed implementing an automatic solution in our billing system</p>				<p>implemented on September 23, 2011. PPL Electric anticipates that, in response to a Final Order from the Commission on the content of the Eligible Customer List (ECL), PPL Electric will be providing an identifier on the ECL as well.</p>	<p>EDEWG standards.</p>	
<p>Enhance utility communications in how efficiently and effectively communicate system/process changes, issues and any other information impacting suppliers</p>	<p>High</p>	<ul style="list-style-type: none"> ❖ FE holds monthly supplier meetings ❖ Posting to FE supplier website ❖ FE maintains an “ombudsman” ❖ Need list from EGSs as to what specifically they want to be notified of 	<ul style="list-style-type: none"> ❖ PECO communicates to suppliers via several different avenues. WWW.PECO.COM is a major source of customer and tariff information. The PECO supplier website, SUCCESS, is a secure method to communicate with EGSs, including Choice program information, ECL, settlement data, 	<ul style="list-style-type: none"> ❖ PPL Electric communicates changes via notifications on its supplier web page, e-mail distribution, and periodic supplier meetings. PPL Electric maintains an “ombudsman” whose name and contact information is on the Company’s supplier information web site and is available to EGSs 	<ul style="list-style-type: none"> ❖ Duquesne communicates by email any material changes. ❖ Duquesne also posts on its Supplier Website any changes under its “What’s New” section. 	<ul style="list-style-type: none"> ❖ Poll EGSs to determine if monthly calls with EDCs verses communication via email/websites ❖ EDC’s should hold monthly phone calls with interested EGS’s to discuss status of choice market and any significant utility operational changes.

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			FAQs, meter read schedules, etc. PECO also uses EGS bulletins to communicate important information.			
Ensure that utility notifies EGS's first prior to sending letters to customers advising that another rate option could save them money on the distribution portion of their bill. EGS's to see if the rate change would affect the contract; however EGS's are not made aware of the letter and therefore unprepared to answer the customers' questions.	High	❖ Currently, FE does not have any such policies in place	❖ PECO evaluates letters sent to a customer to determine if EGSs would need to know the information contained in the letter.	❖ PPL Electric stopped proactively advising customers of more advantageous rates at the time retail generation choice began.	❖ Uncertain of the issue. ❖ New rate filings are posted on the Company website. ❖ Additionally, we provide an 814 on changes in rates. We notify EGS when rate changes.	❖ EDCs not consistent. Should EDCs send rate information to customers of EGSs. Are there existing rules/ regulations requiring utilities to communicate this information? Samples of letters/emails from EDC's needed. ❖ EDC's should communicate with EGS's prior to or at least cc'ing communication to EGS's customers. ❖ Further review/ analysis of Act 129 provisions may help clarify confusion.
Identify reasonableness of EGC charges to EGS's for services <ul style="list-style-type: none"> • EDC charges EGSs for IDR requests. but gives 	Medium	❖ All interval meter data is located on a secure website for licensed PA Suppliers ❖ No FE companies charging for either	❖ PECO treats all suppliers the same (affiliate or otherwise). PECO does not charge for IDR request via EDI.	❖ PPL Electric does not charge for interval data (either historical interval data or monthly interval usage data for billing	❖ Charges are uniformly applied to all EGSs. ❖ Pursuant to tariff, IDR information is provided for free for the first request in a	❖ No charges/fees to EGS's for IDR requests - EDCs should receive cost recovery for prudent costs

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<p>it to affiliates for free (for example how do EGS handle IDR requests).</p>		<p>historical interval data or monthly interval usage data for billing purposes</p>	<p>For manual requests, PECO charges \$100 per account for IDR.</p>	<p>purposes) provided via EDI. All of PPL Electric’s customers have historical interval data available to them at no cost via the Company’s EnergyAnalyzer web site. Customers may make the data available to whomever they choose.</p>	<p>calendar year and any subsequent requests are provided for a fee of \$60 per account. That standard is in place for all EGS’s without preference to any EGS.</p>	
<p>TOU rates/ wind rates / other offerings by default supplier. Shouldn’t the default service provider just provide plain vanilla service?</p>	<p>Medium</p>	<ul style="list-style-type: none"> ❖ As required by Act 129, FE utilities have the following rates available: <ul style="list-style-type: none"> ○ CPP/CPR (West Penn Power) – targeting roughly 25,000 customers – program is needed to hit the top 100 hour requirement of Act 129. 	<ul style="list-style-type: none"> ❖ PECO offers a Wind product, Act 129 mandates PECO to offer Time of Use (TOU) and Critical Peak Pricing (CPP) but this has not been implemented yet, Procurement Class 4 Hourly Price. 	<ul style="list-style-type: none"> ❖ PPL Electric offers TOU as an alternate default service for Residential and Small C & I customers. However, that service has been suspended pursuant to PPL Electric petition dated August 22, 2011 and PUC Order entered August 25, 2011 (Docket No. M-2011-2258733). ❖ PPL Electric solicits for supply for 	<ul style="list-style-type: none"> ❖ TOU pilot projects have been approved by the PUC. Excepting TOU which is required, Duquesne does not make multiple offerings to default service customers. 	<ul style="list-style-type: none"> ❖ Act 129 may need to be amended Unless required by statute, LDC’s would not provide any commodity products other than plain vanilla default service. Non-commodity offerings should be provided by the market. Act 129 interpretation / changes may be required.

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		<ul style="list-style-type: none"> ○ TOU Optional – Residential (Penn Power) ○ Optional Real-Time – Small Commercial (Met-Ed and Penelec) 		<p>Optional Monthly Priced Service for Large C & I customers pursuant to its PUC-approved default service plan. Thus far, that solicitation has not been fully subscribed and, consequently, that service has not been available to customers.</p>		
<p>Default Services / Act 129 Marketing Programs : there are commercials/billboards for utility schedules – seems like they are actively trying to get customers</p>	<p>Medium</p>	<ul style="list-style-type: none"> ❖ West Penn - CPP/CPR – Email-driven marketing campaign (targeting 25,000 customers in support of Act 129 requirements to reduce the top 100 hours) 	<ul style="list-style-type: none"> ❖ PECO does not promote default service via commercials or billboards. Customer shopping is promoted. Smart Ideas is promoted but this is a PUC approved program for energy savings. 	<ul style="list-style-type: none"> ❖ In general, PPL Electric does not promote default service programs. PPL Electric is required by PUC regulations to notice price changes to customers. This is done via bill insert. Also, PPL Electric was required by PUC Order (entered December 2, 2010 at Docket No. R-2010-2201138) to inform customers of the 	<ul style="list-style-type: none"> ❖ No marketing campaign by Duquesne. Required to produce rate schedules upon request from a customer. 	<ul style="list-style-type: none"> ❖ Ensure EDC’s are not promoting default service. EDC’s should advertise “pipes and wires” related issues (EG reliability, tree trimming, outage and other service emergencies) ❖ Utility prohibition of advertising default service and other commodity options and non-commodity offerings is dependent on interpretation / resolution of Act 129 review.

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				availability of TOU rates. This was done via an article in the Company's monthly newsletter "Connect".		
	❖			❖		❖
Confusion by customers offered payment arrangements (arrears) told they need to make arrangements with EGS's. POR in place no need to contact EGS's.	Medium	❖ We do not direct customer to suppliers for handling arrears	❖ PECO offers payment arrangements and budget billing to customers with properly submitted supplier charges. There is no need to contact the EGS.	❖ With the implementation of a Purchase of Receivables (POR) program for the Residential and Small C & I customer classes in 2010, PPL Electric offers payment arrangements for the entire bill for those classes of customers. Large C & I customers who have 60-day arrearages are reverted to dual billing.	❖ We do not tell customer to make arrangements with the EGS.	❖ EDC call center reps should not convey to customers that they need to make payment arrangements with EGS's. Training to include this issue.
Voice activated responses sometimes "advertise" default service in recording. What is available on	Low	❖ Do not "advertise" default service in our customer choice topics and have very little related to it on	❖ PECO does not promote default service, IVR or otherwise.	❖ PPL Electric does not include any default service messages in its IVR or in its "on hold" messaging.	❖ None. Music is played while customer on hold.	❖ Still awaiting feedback from EDC's ❖ Each EDC needs to develop IDR choice options ❖ EDC's should only promote

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the EDCs IVR to promote choice?		the web (other than our Default Service rates) ❖ IVR FAQs: 1. What is Electric Choice? 2. What is the Price to Compare? 3. Am I able to remain on the budget program if I select a supplier? 4. What is the eligible customer list? 5. How do I shop for electricity? ❖ Where can I get a list of licensed suppliers?				default service as back stop rather than first stop
For issues that we see with the treatment/settlement of unaccounted energy	Low	❖ FirstEnergy allocates Unaccounted For Energy to all retail Load Serving Entities operating in the FirstEnergy Pennsylvania service	❖ PECO allocates Unaccounted For Energy (UFE) on a load ratio share basis to all suppliers during settlement.	❖ PPL Electric allocates unaccounted for energy among EGSs and default service on a pro rata basis consistent with the end use retail	❖ All Load Serving Entities, including the EDC, are responsible for Unaccounted for Energy. The balances are both positive and negative on a monthly	❖ Need additional information from EGSs. All EDCs use load sharing process.

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		territories (or load zones) of PJM hourly on a load share basis. ❖ For a more detailed description of this process please see documents posted on FE Supplier Service website		meter reads and published loss factors.	basis and determined by PJM.	
EDC handle enrollment first in vs. last in	Low	❖ First in, but possibility of changing to new EGS starting with next billing cycle.	❖ PECO is “last in”.	❖ PPL Electric honors the last enrollment received prior to the 16-day enrollment black-out.	❖ The last direction provided by the customer is the one that Duquesne uses as the guide if there is a conflict.	❖ Collecting more feedback from EGS’.
New market entry / EGS licensing/ EDI approval. Another operational-type issue that favors default service is matching the EGS testing windows with EGS license approvals. Each EDC appears to have certain testing windows and requires that the EGS be licensed by the PUC in order to participate or else they have to	Low	❖ FE does not do EDI testing until AFTER PA Commission licensing ❖ Once EDI testing is complete, enrollment is automatically processed; hence, testing must be the last step	❖ PECO does not do EDI testing until AFTER PA Commission licensing. Once EDI testing is complete, enrollment is processed; hence, testing has to be the last step. ❖ PECO schedules EDI testing sessions for the upcoming year, taking into account the PUC meeting	❖ PPL Electric has posted on its supplier website information concerning EDI testing including all requirements that a supplier must satisfy prior to the start of EDI testing. PPL Electric typically conducts six testing flights in a given year. PPL Electric can accommodate 5 to 7 EGSs per flight,	❖ Duquesne’s periodic EDI testing schedule is published for all potential suppliers to arrange its filing and requirements. ❖ Duquesne does not do EDI testing for an EGS until after PA Commission has licensed the EGS since customers can be enrolled after testing and that should not be permissible until after	❖ EDC’s should make EDI testing available throughout the year, rather than waiting/scheduling flights.

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Prioritized Supplier Issues	Status	First Energy	PECO	PPL	Duquesne	Recommendations/Best Practices
<p>wait another three months before they are eligible to test again. Factors such as the PUC's public meeting schedule and staff processing can create barriers for new market entry that default service obviously doesn't face. PECO's upcoming Oct testing is a good example. The PUC's public meetings are scheduled for 9/8 and 9/22 but not again for three weeks until 10/13 - after PECO's testing window.</p>			<p>schedule. This is to allow for resource planning.</p>	<p>and needs those EGSs to be prepared to test in a competent manner or the other EGSs in the flight and perhaps the conduct of the other flights might be affected. It is, in part, out of a concern for fairness to all EGSs and in recognition that testing is a critical activity and limited in its availability, that PPL Electric requires EGSs to complete certain fundamental requirements including obtaining a license as an Electric Generation Supplier in Pennsylvania. Additionally, the cost of testing a single EGS is \$4,000 to \$5,000 dollars and is reflected in distribution rates as a</p>	<p>PUC approval. Additionally, the EGS would have access to customer information as part of EDI testing which should not be permissible until after the PUC licenses the EGS. ❖ EDI testing can be done concurrently with other Duquesne requirements to be satisfied.</p>	

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				<p>non-bypassable cost of facilitating competition that is recovered from all customers. The requirement that EGSs complete certain fundamental requirements also helps to assure that testing will be successful and that the ratepayer investment will result in an additional competitive option.</p>		