

<u>Supplier Issues</u>	<u>FirstEnergy</u>	<u>PECO</u>	<u>PPL</u>	<u>Duquesne</u>
<p>1. DLC charges EGSs for IDR request but gives it to them for free. Other examples include</p>	<ul style="list-style-type: none"> <li>❖ All interval meter data is located on a secure website for licensed PA Suppliers</li> <li>❖ No FE companies charging for either historical interval data or monthly interval usage data for billing purposes</li> </ul>	<ul style="list-style-type: none"> <li>❖ PECO treats all suppliers the same (affiliate or otherwise). PECO does not charge for IDR request via EDI. For manual requests, PECO charges \$100 per account for IDR.</li> </ul>	<ul style="list-style-type: none"> <li>❖ PPL Electric does not charge for interval data (either historical interval data or monthly interval usage data for billing 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.</li> </ul>	<ul style="list-style-type: none"> <li>❖ Charges are uniformly applied to all EGSs.</li> <li>❖ Pursuant to tariff, IDR information is provided for free for the first request in a 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.</li> </ul>
<p>2. Automatic assignment of customer to default service (new or moved customer)</p>	<ul style="list-style-type: none"> <li>❖ Minimum of 1 month on default service</li> <li>❖ 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.</li> </ul>	<ul style="list-style-type: none"> <li>❖ Minimum of one month on Default Service</li> </ul>	<ul style="list-style-type: none"> <li>❖ 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</li> </ul>	<ul style="list-style-type: none"> <li>❖ Minimum of 1 month on default service</li> <li>❖ Mover’s Guide is provided to customer with shopping options.</li> </ul>

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			<p>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).</p>	
<p>3. Automatic reassignment of customer to default service when there is a change to customer's service (moves, name change, tax ID change, etc)</p>	<ul style="list-style-type: none"> <li>❖ Customer dropped with change in either premise number or tax ID number.</li> <li>❖ 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.</li> <li>❖ <b><u>Drop Requests:</u></b> <ol style="list-style-type: none"> <li>1. Customer dropped 10 days following termination for</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>❖ Supplier drop, customer call to rescind/return to PECO, customer move, name change causing the customer to get a new account number, new service Installed at premise, certain rate changes (CAP, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>❖ In general, changes in a customer's service that require the establishment of a new account number will end the EGS relationship and 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</li> </ul>	<ul style="list-style-type: none"> <li>❖ 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 switch. Basis is whether there is a new account.</li> </ul>

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	<p>non-payment and account is finalized;</p> <ol style="list-style-type: none"> <li>2. customer moved or account closed;</li> <li>3. dropped by customer request;</li> <li>4. customer changed to another service provider;</li> <li>5. withdrawn;</li> <li>6. alleged slam</li> </ol> <p>❖ <b><u>Rejection Reasons:</u></b></p> <ol style="list-style-type: none"> <li>1. Account exists but is not active;</li> <li>2. move pending;</li> <li>3. account not found;</li> <li>4. duplicate request received;</li> <li>5. action code invalid;</li> <li>6. account not eligible;</li> <li>7. service provider not licensed to provide requested service;</li> <li>8. required information missing;</li> <li>9. customer name is missing from the</li> </ol>		<p>Company will, via a manual process, associate the EGS with the new account.</p>	

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	request; 10. date/time invalid or missing; 11. incorrect billing option requested; 12. incorrect billing calculation 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			

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	EDC; 23. requested rate not found or not in effect on the requested date; 24. currently enrolled			
4. Voice activated responses sometimes “advertise” default service in recording	❖ Do not "advertise" default service in our customer choice topics and have very little related to it on 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? 6. Where can I get a list of licensed suppliers?	❖ 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.
5. Data Security Re:	❖ Same procedure for	❖ PECO treats all	❖ PPL Electric treats	❖ Same procedure for

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<p>Affiliated suppliers</p>	<p>affiliates as for unaffiliated suppliers – all have access to supplier support website.</p>	<p>suppliers the same (affiliate or otherwise). PECO follows a strict Standards of Conduct policy that will not allow the treatment of affiliates different than other EGSs.</p>	<p>all EGSs, including its affiliated EGS, on a comparable basis with regard to the availability of customer data.</p>	<p>affiliates as for unaffiliated suppliers. All treated the same. All have access to customer website.</p>
<p>6. TOU rates/other offerings by default supplier</p>	<ul style="list-style-type: none"> <li>❖ As required by Act 129, FE utilities have the following rates available:               <ul style="list-style-type: none"> <li>○ CPP/CPR (West Penn Power) – targeting roughly 25,000 customers – program is needed to hit the top 100 hour requirement of Act 129.</li> <li>○ TOU Optional – Residential (Penn Power)</li> <li>○ Optional Real-Time – Small Commercial (Met-Ed and Penelec)</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>❖ 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.</li> </ul>	<ul style="list-style-type: none"> <li>❖ PPL Electric offers TOU as an alternate default service for Residential and Small C &amp; 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).</li> <li>❖ PPL Electric solicits for supply for Optional Monthly Priced Service for Large C &amp; I customers pursuant to its PUC-approved</li> </ul>	<ul style="list-style-type: none"> <li>❖ TOU pilot projects have been approved by the PUC. Excepting TOU which is required, Duquesne does not make multiple offerings to default service customers.</li> </ul>

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			default service plan. Thus far, that solicitation has not been fully subscribed and, consequently, that service has not been available to customers.	
7. Utility rates listed first on PA Power Switch	❖ 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.
8. Marketing: there are commercials/billboards for utility schedules – seems like they are	❖ West Penn - CPP/CPR – Email-driven marketing campaign (targeting 25,000	❖ PECO does not promote default service via commercials or	❖ In general, PPL Electric does not promote default service programs.	❖ No marketing campaign by Duquesne. Required to produce rate

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actively trying to get customers	customers in support of Act 129 requirements to reduce the top 100 hours)	billboards. Customer shopping is promoted. Smart Ideas is promoted but this is a PUC approved program for energy savings.	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 availability of TOU rates. This was done via an article in the Company’s monthly newsletter “Connect”.	schedules upon request from a customer.
9. Issue that we see with the treatment/settlement of unaccounted energy	❖ FirstEnergy allocates Unaccounted For Energy to all retail Load Serving Entities operating in the FirstEnergy Pennsylvania service territories (or load zones) of PJM hourly on a load share basis. <ul style="list-style-type: none"> <li>○ For a more detailed description of this</li> </ul>	❖ 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 meter reads and published loss factors.	❖ All Load Serving Entities, including the EDC, are responsible for Unaccounted for Energy. The balances are both positive and negative on a monthly basis and determined by PJM.

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	<p>process please see documents posted on FE Supplier Service website</p>			
<p>10. EGS receives enrollment data and validates utility data in regards to dual billing:</p> <p><b>a.</b> Customer is notified 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>b.</b> EGS submits accounts for enrollments</p> <p><b>c.</b> Utility responds</p> <p>i. Some accounts accepted and read cycle given</p> <p>ii. Some reject no start no cycle and no reason given</p>	<ul style="list-style-type: none"> <li>❖ When a supplier sends in an enrollment for dual billing, they send in an 814 enrollment and SAP accepts that 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.</li> <li>❖ SAP generates a Dual Billing Enrollment Letter</li> <li>❖ 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.</li> <li>❖ We have had no complaints about dual</li> </ul>	<ul style="list-style-type: none"> <li>❖ PECO no longer initiates a switch to dual billing. A switch to dual billing can only be initiated by supplier request.</li> </ul>	<ul style="list-style-type: none"> <li>❖ (Response to a): With the implementation of a Purchase of Receivables (POR) program for the Residential and Small C &amp; I customer classes in 2010, PPL Electric reverts only Large C &amp; 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.</li> <li>❖ (Response to b, c, d): Pursuant to EDEWG rules, PPL Electric responds to all enrollments with an</li> </ul>	<ul style="list-style-type: none"> <li>❖ A Form 814 change is submitted to change a billing option. This comes from the supplier, not the EDC. If we reject any enrollment, we always provide a reason. We use the EDEWG standards.</li> </ul>

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<p>d. Rejected accounts resubmitted and accepted (no reason given to the EGS)</p>	<p>billing rejections.</p> <ul style="list-style-type: none"> <li>❖ West Penn presently is unable to provide read cycle dates for our 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</li> </ul>		<p>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 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>11. Utility copy of customer bill. The supplier should be allowed to receive or download an image of our customer’s bills (in its entirety) upon request. Currently they only send us</p>	<ul style="list-style-type: none"> <li>❖ FE supplies “example bills” on the FE supplier website but does not supply EGSs with actual customer bills</li> <li>❖ If EGS wants customer bill, the customer may call the Customer Contact Center and</li> </ul>	<ul style="list-style-type: none"> <li>❖ PECO supplies “example bills” on the SUCCESS Website. If EGS requests customer bill, it is the customer’s responsibility to call the Customer Care Center and request the</li> </ul>	<ul style="list-style-type: none"> <li>❖ PPL Electric maintains sample bills on its web site that are available to customers, EGSs and others to aid them in understanding charges for electric service. PPL Electric</li> </ul>	<ul style="list-style-type: none"> <li>❖ Duquesne supplies sample bills on its Supplier Website</li> <li>❖ Duquesne does not supply EGSs with customer bills due to confidential information on credit, payment history, and</li> </ul>

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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?	request the bill themselves	bill themselves. PECO does not supply EGSs with a full image of customer bills due to privacy issues.	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.	other matters on the bill.
12. 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. PPL and Duquesne are sending emailing us net meter customers' account, but this does not	❖ 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.	❖ 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.	❖ 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 implemented on September 23, 2011. PPL Electric anticipates that, in response to a Final	❖ 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 EDEWG standards.

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allowed implementing an automatic solution in our billing system			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.	
13. Enhance utility communications in how efficiently and effectively communicate system/process changes, issues and any other information impacting suppliers	<ul style="list-style-type: none"> <li>❖ FE holds monthly supplier meetings</li> <li>❖ Posting to FE supplier website</li> <li>❖ FE maintains an “ombudsman”</li> <li>❖ Need list from EGSs as to what specifically they want to be notified of</li> </ul>	<ul style="list-style-type: none"> <li>❖ PECO communicates to suppliers via several different avenues. <a href="http://WWW.PECO.COM">WWW.PECO.COM</a> 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, FAQs, meter read schedules, etc. PECO also uses EGS bulletins to communicate important information.</li> </ul>	<ul style="list-style-type: none"> <li>❖ 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</li> </ul>	<ul style="list-style-type: none"> <li>❖ Duquesne communicates by email any material changes.</li> <li>❖ Duquesne also posts on its Supplier Website any changes under its “What’s New” section.</li> </ul>
14. Eligibility of CAP, LIHEAP customers to enroll with	<ul style="list-style-type: none"> <li>❖ <u>Met-Ed, Penelec and Penn Power</u>: Currently, CAP &amp; LIHEAP</li> </ul>	<ul style="list-style-type: none"> <li>❖ By PUC regulation, PECO does not allow CAP customers to</li> </ul>	<ul style="list-style-type: none"> <li>❖ PPL Electric CAP and LIHEAP customers can take</li> </ul>	<ul style="list-style-type: none"> <li>❖ Yes, CAP customers can shop if the switch to an EGS results in</li> </ul>

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competitive suppliers	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	choose an EGS.	service from EGSs.	the least overall cost.
15. 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 GS's are not made aware of the letter and therefore unprepared to answer the customers' questions.	❖ 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.
16. Confusion by customers offered payment arrangements (arrears) told they need	❖ We do not direct customer to suppliers for handling arrears	❖ PECO offers payment arrangements and budget billing to customers with	❖ With the implementation of a Purchase of Receivables (POR)	❖ We do not tell customer to make arrangements with the EGS.

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to make arrangements with EGS's. POR in place no need to contact EGS's.		properly submitted supplier charges. There is no need to contact the EGS.	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.	
17. EDC handle enrollment first in vs. last in	❖ First in	❖ 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.
18. 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	<ul style="list-style-type: none"> <li>❖ FE does not do EDI testing until AFTER PA Commission licensing</li> <li>❖ Once EDI testing is complete, enrollment is automatically processed; hence, testing must be the last step</li> </ul>	<ul style="list-style-type: none"> <li>❖ 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.</li> <li>❖ PECO schedules EDI testing sessions for the upcoming year, taking</li> </ul>	❖ 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	<ul style="list-style-type: none"> <li>❖ Duquesne's periodic EDI testing schedule is published for all potential suppliers to arrange its filing and requirements.</li> <li>❖ Duquesne does not do EDI testing for an EGS until after PA Commission has licensed the EGS since customers can be</li> </ul>

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<p>participate or else they have to 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>into account the PUC meeting schedule. This is to allow for resource planning.</p>	<p>year. PPL Electric can accommodate 5 to 7 EGSs per flight, 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</p>	<p>enrolled after testing and that should not be permissible until after 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.</p> <p>❖ EDI testing can be done concurrently with other Duquesne requirements to be satisfied.</p>

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			<p>reflected in distribution rates as a 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>	