

CHARGE Conference Call

October 20, 2011 – 9:30 a.m.

Call-in Number: 866-618-6746 and Access Code: 6060145

Topics for Discussion

17. EGS Marketing Activities

- PUC adopted guidelines on November 4, 2010, which is available at the following link:
<http://www.puc.state.pa.us/general/ConsolidatedCaseView.aspx?Docket=M-2010-2185981>
- Proposed rulemaking order adopted by PUC at February 10, 2011 Public Meeting; copy of entered order is attached; can be accessed on OCMO page and at the following link:
<http://www.puc.state.pa.us/general/ConsolidatedCaseView.aspx?Docket=L-2010-2208332>
 - Proposed regulations have been approved by the Office of Attorney General and are awaiting publication in Pa. Bulletin
 - *Publication cannot occur until after delivery to the legislature upon return to session later this month*
 - Staff will advise group when proposed regulations are published

31. Eligible Customer List

- PUC adopted final order on November 12, 2010, which is available at the following link:
<http://www.puc.state.pa.us/general/ConsolidatedCaseView.aspx?Docket=M-2010-2183412>
- OCA and PA Coalition Against Domestic Violence filed Petitions for Review with Commonwealth Court, which has granted stay of November 12, 2010 order
- Commission issued Secretarial Letter on February 15, 2011 clarifying effect of stay and filed an Application for Remand with Commonwealth Court, which was granted
- Commission entered attached Reconsideration Order for comment on June 13, 2011; comments were due on July 13, 2011 and reply comments were due on July 28, 2011
- *Awaiting Commission action*

44. Net Metering Customers/EDI Change Control #85

- Questions have been raised by customers who have net metering arrangements with EDCs and then switched to EGSs without entering into net metering contracts with the EGSs; staff noted the need for customers to make these arrangements with EGSs before they switch
 - Staff has encouraged EDCs to educate customers at the time they sign a net metering contract and during the enrollment process (i.e. confirmation letter)
 - Staff has encouraged EGSs to also ensure that customers are aware before they switch that if they are on a net metering tariff, they will no longer receive energy credits from the EDC; it is up to EGSs if they want to offer energy credits to the customer
- EDEWG Update: EDI Control Change #85 would add special meter configuration segment to the EDI 814 Enrollment, Change, Reinstatement and EDI 867 Historical Usage and Historical Interval Usage transaction sets
 - Consensus not achieved in EDEWG; issue referred to CHARGE (summary attached)
 - EGSs are supportive of change; EDCs generally do not object to change but point to time and resources needed to implement; Duquesne plans to automate process in the first quarter of 2013; Duquesne and PPL currently send spreadsheets to EGSs with this information
- Discussion of any EDC plans to include this information on ECL
 - PPL plans to include it after the first of the year (2012); Duquesne has submitted request to compliance team; First Energy does not have confirmation of moving forward but does not anticipate problems; and PECO has submitted a request to team to include net metering indicator on ECL
- Staff proposed on July 21 that CHARGE seek Commission approval of EDI Control Change #85 and that EDCs implement this change within 12 months after Commission approval unless an EDC already has plans to make system-wide changes at a later time that would incorporate these changes
 - No objections were raised to this proposal
- Staff is moving forward to seek Commission approval
- *Discussion of proposal to include Net Metering Column on PAPowerswitch.com*

45. **Accelerating Supplier Switching Timeframes**

- Group discussed enrollment process/supplier switching timeframes
- As outlined in the attachment (revised to include points from today's discussion), the process currently takes 16-45 days
 - Includes the 10-day confirmation period required by the PUC's anti-slamming regulations
 - No mid-cycle switches are done, so that if the enrollment is not submitted at least 16 days prior to the next meter read, the switch is delayed to the next meter read 30 days later
- Staff has done outreach with EDCs and other states, including Texas and Maryland; it was suggested that Connecticut's process also be reviewed
 - Staff suggested that EGSs should be mindful of customers' meter read dates and strive to send enrollments at least 16 days prior to those dates, and communicate the timeframes for switching to customers
 - Staff also asked for feedback on reducing the 10-day confirmation period and on the possibility of mid-cycle switches
- EGSs expressed support for changes that would accelerate the switching timeframe
 - Waiting period could be eliminated, with economic penalties for slamming that would result in customers being held harmless
 - Confirmation process could be electronic
 - Smart meters should make it technically feasible to do mid-cycle switches
- EDCs expressed concerns about changes that would accelerate the switching timeframes
 - Easier to unwind slamming prior to the customer being switched
 - Billing systems are built around meter read dates and would need expensive IT changes
 - PJM settlement process may not support mid-cycle switches
- OCA agrees with looking for a cost-effective mechanism to accelerate the switching process but views the confirmation letter as a key to maintaining credibility of the process; would be open to discussing a shorter confirmation period

- *Issues were discussed at Retail Markets Investigation Technical Conference on August 31; Staff is moving forward with recommendation to the Commission*

46. Statewide Investigation

- PUC has launched statewide investigation to ensure properly functioning and workable competitive retail electricity market exists in the Commonwealth; Docket No. I-2011-2237952
- Information posted on website at:
http://www.puc.state.pa.us/electric/Retail_Electricity_Market.aspx
- Investigation will examine both the legislative and regulatory framework behind Pennsylvania's retail market, including an analysis of the current default service model and whether, as currently structured, that model is hindering competition
- To be added to distribution list, please send email to ra-RMI@state.pa.us
- Commission order issued on July 28 outlining the issues that should be addressed by stakeholders during investigation and directing intermediate work plan to be developed by December 2011 and long range work plan to be developed in the first quarter of 2012
- En banc hearing scheduled for November 10 on issues for immediate work plan

47. Price to Compare on Bill

- Question has arisen about whether it would be appropriate (not required) for EDC to include price to compare on bill; all EDCs are currently providing price to compare on bills except for PPL who is planning to move forward to also include
- Prior feedback on this concept, including accuracy, effect on competition and value to consumers
 - It was noted that if this information is included, it is important to state that it is valid for a period of time and subject to change
 - It was also suggested that perhaps it should be included only for residential and small commercial customers
 - Some concerns were raised about the possibility of further confusing customers especially with quarterly price adjustments and that including the PTC may suggest that price is the only relevant factor

- Staff has reviewed MD order and noted some key points:
 - Price to Compare term was discarded
 - All bills must include current price, future price and the date after which prices are unknown
 - Utilities must also provide this information on their websites
- *Discussed during August 31 technical conference for the Retail Markets Investigation and staff is moving forward with recommendation for Commission*

50. Labels of Charges on Bills

- Question has arisen about the labels that must be used to describe charges on bills for residential and small business customers; see 52 Pa. Code §54.4(b)(3), which requires labels of generation and transmission charges; issue was also discussed in March 1999 Staff letter, which is attached
- Many EGSs are using “Energy” charges; some EDCs do not have sufficient space to include “Generation and Transmission” in the EDI transaction
- Staff is concerned about customer confusion if the bills say “Energy” charges but all other materials (marketing, disclosure statements, etc) say “Generation and Transmission”; however, we are not aware of any consumer complaints about the issue
- It appears that the issue may resolve itself as EDCs add space to permit the inclusion of “Generation and Transmission”
- Staff encourages EGSs to use Generation and Transmission where possible but when character limitations prevent inclusion of that label and the unit price, EGSs should choose a label with fewer characters such as “Energy” to ensure that the price is displayed
- *Update on status of PPL’s bills including pre-printed text saying “Generation and Transmission Charges” to bill ready bills (similar to rate ready bills)*

51. Peak Load Contribution & Network Service Peak Load Values/EDI Change Control #87

- Add effective date of Peak Load Contribution & Network Service Peak Load values to the EDI 867 Historical Usage and Historical Interval Usage transaction sets
- EDEWG has been unable to reach consensus and is referring to CHARGE for resolution

- Change would enable EDCs to report effective dates for both current and future PLC/NSPL values; currently the non-incumbent EGS cannot receive the future values via EDI until after June 1 when it becomes current
- EGSs are supportive of change and indicate need for future values in pricing products; EDCs generally do not object to change but point to time and resources needed to implement; FirstEnergy plans to include future values on ECL; Duquesne emails future values to EGSs; PECO posts an ECL list with future values
- Staff proposed that CHARGE seek Commission approval of EDI Control Change #87 and that EDCs implement this change within 12 months after Commission approval unless an EDC already has plans to make system-wide changes at a later time that would incorporate these changes
 - No objections were raised to this proposal
- *Staff is moving forward to seek Commission approval*

52. Duquesne CAP Customers (NEW ISSUE)

- Questions have arisen about the ability of Duquesne CAP customers to switch to EGSs
- Staff has looked into this and learned that Duquesne CAP customers may switch if the EGS is offering a price lower than Duquesne's default service rate
- Duquesne's current billing system is unable to issue consolidated bills to CAP customers but this will no longer be a problem with the new system goes into effect in January 2013
 - Duquesne has communicated this information to suppliers, implemented new reject messages and posted a notice on the supplier customer choice website
 - Duquesne has also provided training material to call center agents and posted information on the website to properly inform customers on CAP that there are qualifying conditions on their eligibility to shop
- Any questions?

53. Variable Prices (NEW ISSUE)

- Customers have raised concerns with variable pricing options, particularly with respect to the manner in which they are presented on PaPowerSwitch.com
- One suggestion is to have a description of variable prices more prominently displayed such as a "hover" over the term when consumers are viewing the offers
- Some confusion seems to exist over introductory vs. variable prices
- Brief discussion of concerns and possible resolutions

General Matters

A. New Issues

- Any new issues or questions about issues previously discussed on CHARGE calls should be submitted to ra-ocmo@state.pa.us

B. Old Agendas/Recaps

- All agendas and recaps are posted on the OCMO page of the website along with various other documents that have been distributed or relied upon during CHARGE discussions, at the following link -
http://www.puc.state.pa.us/electric/electric_CompetitiveMarketOversight.aspx

C. CHARGE Distribution List

- To be added to the CHARGE distribution list, please send an email to ra-ocmo@state.pa.us

D. CHARGE Contact List

- Contact list is on website at the following link:
http://www.puc.state.pa.us/electric/electric_CompetitiveMarketOversight.aspx
- Please send contact information or updates to ra-ocmo@state.pa.us; purpose of this list is to enable stakeholders to contact one another directly to resolve issues and is separate from email distribution list

E. Meeting Schedule for 2011

- November 17, 2011, 9:30 a.m.
- December 22, 2011, 9:30 a.m.