

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<p><b>REFRESH OF ELECTRIC DISTRIBUTION COMPANY ELIGIBLE CUSTOMER LISTS</b></p>
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**INFORMAL COMMENTS OF PECO ENERGY COMPANY  
ON THE OFFICE OF COMPETITIVE OVERSIGHT'S INQUIRY**

**I. INTRODUCTION**

On August 15, 2013, the Pennsylvania Public Utility Commission (“Commission”) adopted a Final Order that established interim guidelines for natural gas eligible customer lists (“ECL”)<sup>1</sup>. The guidelines created a 3-year cycle for refreshing gas ECLs. In conjunction with the Final Order, Commissioners Pamela A. Witmer and James H. Cawley issued a Joint Motion noting that a refresh cycle did not exist for electric ECLs and directing the Office of Competitive Market Oversight (“OCMO”) to explore this matter (for discussion by its CHARGE group). Accordingly, on January 16, 2014, OCMO requested that interested parties submit informal comments regarding their opinions and suggestions on the issue by February 28, 2014. PECO appreciates the opportunity to provide informal comments on OCMO’s request.

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<sup>1</sup> See *Interim Guidelines For Natural Gas Distribution Company Eligible Customer Lists*, Docket No. M-2012-2324075 (Final Order adopted on August 15, 2013).

## **II. INFORMAL COMMENTS**

### **A. Refresh Solicitations for Combination Gas and Electric Utilities:**

PECO believes that combination gas and electric utilities should only have to perform single solicitation efforts applicable to both gas and electric customers. In other words, a combination utility should only need to send one all-inclusive solicitation to each dual-service customer.

This approach will help reduce unnecessary costs related to performing two separate and distinct solicitations, the costs of which would be passed onto ratepayers in future rate cases. This approach also will eliminate customer confusion associated with receiving multiple surveys for both gas and electric services. Customers would be inclined not to respond to a second solicitation because they would think their initial response was all inclusive. Therefore, PECO requests that OCMO support maintaining a combined refresh solicitation applicable to dual service customers. If PECO is allowed to perform one all-inclusive solicitation, it will undertake to do so in 2016.

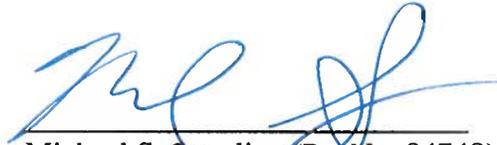
### **B. Cost Recovery for Solicitations:**

The Commission has recognized that the costs associated with the preparation, distribution and solicitation of ECLs are legitimate business expenses for which NGDCs should receive full cost recovery through base rates. Thus, PECO believes that full cost recovery should be allowed for the preparation, distribution and solicitation of natural gas ECLs.

### III. CONCLUSION

PECO appreciates the opportunity to comment on this important matter and requests that the OCMO favorably consider these informal comments.

Respectfully submitted,



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*For PECO Energy Company*