

**Legal Department**

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November 23, 2011

**Via Electronic Mail**

Karen Moury  
Director of Regulatory Operations  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

**Re: Investigation of Pennsylvania's Retail Electricity Market  
Docket No. 2011-2237952**

Dear Ms. Moury:

In accordance with the Commission's October 7, 2011 Secretarial Letter and discussion with Commission staff on the November 17, 2011 Technical Call, PECO Energy Company ("PECO") hereby submits these informal comments in the above-captioned matter. These comments supplement comments previously submitted in this docket jointly by PECO, Exelon Generation Company and Exelon Energy Company, as well as testimony at the June 8, 2011 and November 10, 2011 *en banc* hearings.<sup>1</sup> PECO appreciates the opportunity to provide these comments, which are focused on consumer education issues.

The presentations by Terry Madonna and others on the Survey Panel at the November 10, 2011 *en banc* hearing demonstrate that past consumer education efforts have resulted in excellent consumer awareness of the availability of competitive options in the market. PECO supports the efforts of Commission staff and stakeholders to build on that success and engage more customers in the competitive market by, among other things, developing effective and informative consumer education materials. To further these efforts, PECO would like to reiterate its position on two issues related to consumer education.

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<sup>1</sup> Comments of Exelon to the April 29, 2011 Investigation Order, Docket No. I-2011-2237952 (June 3, 2011); Comments of Exelon to the October 14, 2011 Tentative Order, Docket No. I-2011-2237952 (November 3, 2011).

First, PECO notes that, under PECO's Consumer Education Plan approved by the Commission on August 7, 2008, PECO's budget for customer education will be exhausted by December 31, 2011.<sup>2</sup> Based on discussions in the Commission's stakeholder process, PECO anticipates that the Commission will direct the Electric Distribution Companies ("EDC") to provide new consumer education materials to customers beginning in the first quarter of 2012. Under its tariff, PECO currently recovers all costs prudently incurred for consumer education on a full and current basis through the Consumer Education Charge ("CEC"), a cost recovery mechanism that has worked well. However, as the budget in PECO's Consumer Education Plan does not include additional materials the Commission is considering, PECO will need the Commission to provide authorization to recover the costs of any such additional consumer education materials. In addition, upon finalization of the specific customer communications the Commission recommends for 2012, PECO will file its updated 2012 Consumer Education Plan for Commission approval. Consistent with its existing CEC, PECO also will file its annual reconciliation and updated CEC on February 1, 2012 and anticipates including any additional costs in that filing consistent with the Commission's approval of the Consumer Education Plan.<sup>3</sup>

Second, PECO asks that the Commission recognize that once consumer education materials, such as those currently being discussed by the stakeholders, are fully approved by the Commission a lead time of eight (8) weeks is required before PECO can begin mailing the material to customers. The eight week time-frame includes three to four weeks for the competitive request for proposal ("RFP") process, which includes development of the specifications for the product, putting the RFP out for bid, review of bids received and selection of a vendor. Vendor selection is followed by the printing process, which takes approximately four weeks. The printing process includes preparation of proofs of the educational product, review and approval of the proofs, setting the press for printing, cutting and drying the educational product, ink jet application of customer addresses to the item and the sorting and packaging of the product.

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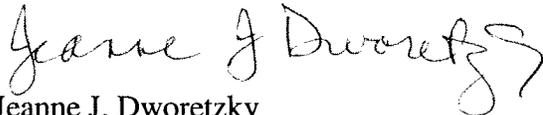
<sup>2</sup> Final Order, PECO Energy Company Consumer Education Plan for 2008-2012. Docket No. 2008-2032274 (August 8, 2008).

<sup>3</sup> PECO Energy Company Electric Service Tariff No. 4, Supplement No. 11, Second Revised Page No. 40 (effective April 1, 2011).

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Again, PECO appreciates the opportunity to provide these comments and looks forward to continuing to work with stakeholders to increase the engagement of consumers in the retail electricity market.

Very truly yours,

A handwritten signature in black ink, reading "Jeanne J. Dworetzky". The signature is written in a cursive, flowing style.

Jeanne J. Dworetzky  
Assistant General Counsel

Cc: Office of Competitive Markets Oversight  
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