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August 4, 2010

**VIA FEDERAL EXPRESS**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

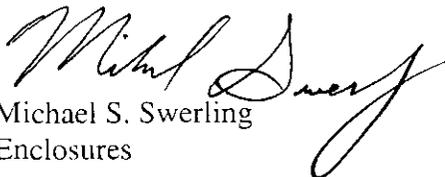
**RECEIVED****AUG 04 2010****PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU**

**Re: Interim Guidelines for Eligible Customer Lists  
Docket No. M-2010-2183412**

Dear Secretary Chiavetta:

Enclosed are an original and five (5) copies of the *Comments of PECO Energy Company to the Commission's Tentative Order to Create a Uniform Eligible Customer List* in the above-captioned matter. An additional copy of this letter is also enclosed to be date-stamped and returned to PECO Energy.

Very truly yours,

  
Michael S. Swerling  
Enclosures

MSS/zr

cc: Office of Competitive Market Oversight

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INTERIM GUIDELINES FOR ELIGIBLE :  
CUSTOMER LISTS : Docket No. M-2010-2183412  
:

**COMMENTS OF PECO ENERGY COMPANY TO THE COMMISSION'S TENTATIVE  
ORDER TO CREATE A UNIFORM ELIGIBLE CUSTOMER LIST**

**INTRODUCTION**

Each utility keeps an Eligible Customer List ("ECL"), which contains information about Electric Distribution Company ("EDC") customers who may be targeted for shopping by Electric Generation Suppliers ("EGS"). On April 8, 2010, the Office of Competitive Market Oversight ("OCMO") held a CHARGE<sup>1</sup> meeting in which creation of a uniform ECL was discussed.

Thereafter, the Commission formed a team to resolve ECL differences among each EDC. The team was tasked with issuing a report about what consensus and non-consensus issues existed. The report indicated that the information provided on each ECLs needed to be more uniform. In response, the Pennsylvania Public Utility Commission ("Commission") issued a Tentative Order ("Order") on July 15, 2010 seeking comments on what standard information should be included in the ECLs. Comments are due from interested parties within twenty (20) days after the Order's issuance date.

PECO Energy Company ("PECO") hereby files its comments to the Commission's Order and appreciates the Commission's efforts at creating more uniform ECLs to further retail competition.

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<sup>1</sup> Committee Handling Activities for Retail Growth in Electricity.

## COMMENTS

### 1. Addition of Customer Phone Numbers to the PECO ECL

The Commission's Order proposed that all ECLs shall include customer telephone numbers, except when restricted by customers. PECO is supportive of this goal, but requires more time to implement this change than the Order currently prescribes. Implementing this change before 2012 may cause customer confusion because PECO recently completed a bill insert process, to update the release preferences of 1.6 million PECO customers in its current ECL. Because PECO currently does not include customers' telephone numbers on its ECL and because PECO understands customers' concerns over releasing their telephone information, the bill inserts included a statement that customer telephone numbers will not be provided to suppliers. See Appendix A for a copy of PECO's recent bill inserts. These notices to ascertain current customer information release preferences were approved by the Commission in docket P-2008-2062739, *Petition of PECO Energy Company For Expedited Approval Of Its Default Service Program And Rate Mitigation Plan*. The Commission's current proposal contradicts the Commission's previously approved message in PECO's bill inserts.

To ensure PECO provides reasonable service and to avoid confusion, PECO requests that it be allowed to modify its ECL when it files its next Default Service Plan ("DSP") filing. After that, PECO will add customer telephone numbers to its ECL, and conduct another notice process to ascertain current customer information release preferences.

### 2. Interval Meter Data

The Commission's Order proposed that all ECLs shall include an indicator for accounts that utilize an interval meter. Although PECO supports placing such an indicator on its ECL,

substantial system designs and timing concerns will not allow meter-specific data to be provided easily and cheaply. PECO's system is designed to track interval meter data at an account-specific level. Therefore, PECO's ECL does not contain meter-specific information. Costly, lengthy and significant Information Technology ("IT") changes would be necessary, requiring coordination with, and redesign of, information systems, to provide meter-specific data.<sup>2</sup> Therefore, PECO suggests an approach where EDCs provide EGSs with account-specific data. This approach is reasonable because suppliers already provide service to customers at the account-specific level.

### 3. Implementation Timing

PECO estimates that the implementation of these changes, in addition to the recent actions it has agreed to take in the interests of retail competition, would require time for development, implementation and testing. During 2010 and early 2011, in particular, PECO will be implementing a considerable amount of systems changes for a wide variety of high priority matters for customers and electric generation suppliers, including many items to support retail electric choice. The following changes are already in development:

- Default Service Plan Implementation;
- Version upgrade and customization of "Retail Office", PECO's energy forecasting, scheduling and invoicing software package for electric choice and default generation supply;
- Billing system changes to accommodate new default service customer classes;
- System changes required to implement a revised Electric Purchase of Receivables Program;

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<sup>2</sup> PECO also notes that it is difficult to provide this information at a meter level if there are multiple meters on the account.

- Implementing a new EDI transaction, i.e., Advance Notice to Drop notification, which will assist EGSs in managing their supply portfolio;
- Implementation of new load curves for monthly-metered customers, used for energy scheduling for EGS and default service load settlement with PJM;
- Enhanced Budget Billing functionality;
- Energy Efficiency and Conservation Plan Implementation;
- Smart Meter Plan Implementation;
- Dynamic Pricing Options;
- Initial Smart Meter IT work;
- Implementing a Web-based tool for customers to access their historic usage data;
- Early Phase-In Program;
- PECO.com website redesign;
- Billing system changes for electric distribution and gas distribution rates; and
- Implementation of the EDI Historical Interval Usage transaction.

Requiring the proposed ECL amendments before the end of 2011 would require substantial changes to the design of upgrades PECO is already in the process of implementing. The Company is concerned that imposing additional systems redesign and implementation work during the transition to unbundled rates would put the successful execution of its existing plans at risk. Therefore, PECO requests an extension to implement these ECL amendments until its next DSP filing.

#### 4. Cost Recovery

Regardless of implementation timing, there will be implementation costs for the proposed ECL amendments and issues relating to cost recovery have not been addressed. PECO believes that the Company should be entitled to recover the costs associated with implementation of the

proposed ECL amendments on a full and current basis, which may be best accomplished through a non-bypassable surcharge to all customers.

#### 5. ECL Issues Related to Situations Involving Domestic Violence

The Commission's Order requested comment on situations involving domestic violence victims who wish to conceal their address changes. PECO currently has an approved process that allows customers three options regarding the release of information to suppliers via the ECL:

- 1) Option 1: Provide only their name, address and account number;
- 2) Option 2: Do not provide any information; and
- 3) Option 3: Provide their name, address, account number and usage information.

PECO's preference is maintain the current three options for its customers. Victims of domestic violence may contact the Company and request Option 2, "Do not provide any information", and their information will be removed from the ECL. PECO is also willing to coordinate public outreach efforts with the Pennsylvania Coalition Against Domestic Violence.

#### 6. Capacity and Transmission Obligations

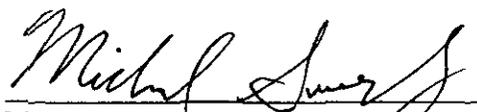
The Commission's Order proposed that all ECLs shall include current and future Capacity and Transmission obligations when these calculations are available. Although PECO supports this amendment, it should be noted that future capacity and transmission obligations are not readily available at all times of the year, because of the nature of the PJM process for calculating the obligations. Therefore, PECO interprets the Commission's proposal to mean that these obligations, current and future, will be provided at those points during each year when they become available to the EDCs.

**CONCLUSION**

PECO requests that the Commission: 1) grant PECO an extension for placing customer telephone numbers on its ECL and the remaining ECL amendments until its next DSP filing; 2) adopt an account-specific approach regarding the provision of interval meter data to suppliers; 3) implement cost recovery for these amendments on a full and current basis, through a non-bypassable surcharge to all customers; 4) allow PECO to maintain all of its existing information release options, including the option which allows domestic violence victims to restrict all of their data from ECLs; and 5) allow EDCs to provide current and future Capacity and Transmission obligations after they become available to EDCs.

Respectfully submitted,

Dated: August 4, 2010



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# Appendix A

## Commercial Insert

### Did you know you can shop for suppliers?

As part of Pennsylvania Electric Choice, customers can shop for electricity from a competitive electric generation supplier. Whether you are purchasing your electricity from a competitive electric generation supplier or from PECO, PECO will continue to safely deliver electricity, provide billing and customer support, and respond to outages and other emergencies for ALL customers.

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*"If you choose a competitive supplier, PECO will continue to deliver your electricity, provide reliable service and respond to outage problems," said Pennsylvania Public Utility Commission Chairman James H. Cawley. "The quality, reliability and maintenance of your electric service should not change as it is still monitored by the Commission. You may be able to save money with a competitive supplier."*

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You can potentially save money by choosing the right energy supplier for your home or business. And we expect more activity by competitive electric generation suppliers as the end of the rate cap approaches. In the PECO service area, rate caps expire January 1, 2011.

#### **For more information on Pennsylvania Electric Choice:**

- Pennsylvania Office of the Consumer Advocate:  
[www.oca.state.pa.us](http://www.oca.state.pa.us), or call 1-800-684-6560
- Pennsylvania Public Utility Commission:  
[www.papowerswitch.com](http://www.papowerswitch.com), or call 1-800-692-7380

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## To help make the decision that is right for you

To help you to receive offers from competitive electric generation suppliers, PECO will provide suppliers with your helpful information including; name, address, account number and energy usage information. Your telephone number will not be released.

If you would like to limit the information PECO provides to competitive electric generation suppliers:

- Complete the form below and return it with your next monthly payment
- Call 1-800-220-PECO (*press 2, press 4, press 4 and continue to follow voice prompts.*)

*Please be aware that if you choose to restrict your information, you might not receive potential money saving offers from competitive electric generation suppliers.*

---

Provide only my name, address and account number

Do not provide any of my information

Provide my name, address, account number and energy usage information (No Action Required)

Please print:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Phone: \_\_\_\_\_

Account Number: \_\_\_\_\_  
(Required)

Return with your next monthly payment.

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## Residential Insert

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that is right for you**

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If you would like to limit the information PECO provides to competitive electric generation suppliers:

- Complete the form below and return it with your next monthly payment
- Visit [www.peco.com/service](http://www.peco.com/service) (You will need to log in or register to access your account online)
- Call 1-800-494-4000 (press 3, press 4, press 4 and continue to follow voice prompts.)

*Please be aware that if you choose to restrict your information, you might not receive potential money saving offers from competitive electric generation suppliers.*

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Provide only my name, address and account number

Do not provide any of my information

Provide my name, address, account number and energy usage information (No Action Required)

Please print:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_

Phone: \_\_\_\_\_

Account Number: \_\_\_\_\_  
(Required)

Return with your next monthly payment.

From: Origin ID: REDA (215) 841-5604  
Zulma Rodriguez  
Exelon  
2301 Market Street  
Suite 23-1  
Philadelphia, PA 19103



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PO #  
Dept #

SHIP TO: (717) 772-7777 BILL SENDER  
**Rosemary Chiavetta, Secretary**  
**PA Public Utility Commission**  
**400 NORTH ST**  
**COMMONWEALTH KEYSTONE BLDG**  
**HARRISBURG, PA 17120**

TRK# 7937 9123 6143  
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