

610-929-3601

Bradley A. Bingaman, Esq.
(610) 921-6203
(610) 939-8655 (Fax)

August 4, 2010

VIA OVERNIGHT UNITED PARCEL SERVICE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

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AUG 4 2010
PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Secretary Chiavetta:

Enclosed for filing are an original and six (6) copies of Comments of Metropolitan Edison Company, Pennsylvania Electric Company and Pennsylvania Power Company pursuant to the Commission's Tentative Order in the above-captioned docket.

Please date stamp the additional copy and return it to me in the enclosed, postage-prepaid envelope. Please contact me if you have any questions regarding this matter.

Very truly yours,



Bradley A. Bingaman

dln
Enclosures

c: As Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMENTS OF METROPOLITAN EDISON COMPANY,
PENNSYLVANIA ELECTRIC COMPANY
AND PENNSYLVANIA POWER COMPANY**

I. INTRODUCTION

On July 15, 2010, the Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Order to issue for public comment draft Interim Guidelines for Eligible Customer Lists (“ECLs”) provided and made available by Electric Distribution Companies (“EDCs”) to Electric Generation Suppliers (“EGSs”). The primary goal of the Interim Guidelines is to provide for uniformity in the information provided by EDCs on the ECLs so that EGSs have consistent access to the data necessary to foster retail competition. Interested parties were invited to submit comments within 20 days of the entry date of the Tentative Order.

Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”) and Pennsylvania Power Company (“Penn Power”) (“the Companies”) respectfully submit the following comments regarding the Tentative Order establishing interim guidelines for ECLs in the above-captioned docket.

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II. COMMENTS

The Companies do not have comments on every section of the Tentative Order. Therefore, the comments set forth herein will only address those sections of the Commission's Tentative Order where the Companies wish to offer specific comments and thoughts for the Commission's consideration.

Furthermore, the Companies suggest that any changes that may be required to be made via a Final Order adopting the Interim Guidelines proposed in the Tentative Order should only be done so on a prospective basis and must not be expected to be adopted in previously approved or pending default service proceedings. It is critical to point out that the Companies have recently achieved settlements of all issues in their default service program proceedings, specifically reaching agreement on issues regarding the information that should be included in the ECL, as well as the frequency of updates to the ECL, and methods of transferring the ECL to EGSs.

Met-Ed and Penelec, as well as all the active parties, achieved a Joint Settlement of all issues of Met-Ed's and Penelec's Default Service Programs. Various EGSs, as well as the association representing EGSs, actively and fully participated in that proceeding and agreed to the settlement. The Commission ultimately approved the settlement at Docket Nos. P-2009-2093053 and P-2009-2093054 with an Order entered November 6, 2009.

In addition, Penn Power and the active parties, including several EGSs, recently achieved a settlement in Penn Power's pending default service program proceeding at Docket No. P-2010-2157862. Similar to the Met-Ed and Penelec default service program settlement, the Penn Power settlement also specifically addressed and included ECL issues to the agreement of the active parties. The Companies utilize the same computer system so implementing similar changes as a

result of default service program proceedings settlements will result in the achievement of administrative efficiencies in dealing with ECL, and other, issues.

It would simply be unfair and improper for the Commission to require an EDC to modify a previously achieved and approved settlement by finalizing a Tentative Order that adopts generic Interim Guidelines in an entirely separate proceeding and making those interim guidelines applicable to already existing settlements.

A. Consensus Issues – Minimum Requirements

1. Monthly updates to the ECL

The Companies currently update the ECL quarterly. Quarterly updating of the ECL was one of the numerous issues associated with the ECL that was agreed to in the settlements. The parties agreed that quarterly updating of the ECL is a sufficient frequency to provide usable information to EGSs. The Companies have dedicated a considerable amount of programming time and related costs developing processes to implement the ECL-related enhancements agreed to in the settlements. The ECL updating process must be implemented over a weekend since it requires approximately 17 hours of computer processing time. Because of the limited weekend processing time available each month, there would be a possibility that some months may not have enough processing time available to perform the update on a monthly basis, while properly maintaining and upgrading the capabilities of the Companies' SAP system. Inasmuch as updating the ECL on a quarterly basis was appropriately determined to be sufficient by the settlements, the Companies believe that monthly updates are not warranted and quarterly ECL updates are sufficient to provide EGSs with the necessary customer information.

B. Consensus Issues – Required to the extent information is available

1. On-Peak and Off-Peak kWh (Monthly)

The Companies' ECLs currently do provide twelve months of on- and off-peak kW but do not provide on and off-peak kWh. However, the Companies do provide total monthly kWh, in accordance with the agreed-upon settlements discussed above. Beginning January 1, 2011, the only customers that will be billed utilizing an on-peak and off-peak kWh billing design will be those residential customers on rate RT for Met-Ed and Penelec and those who volunteer for a new time-of-day default service option at Penn Power. The additional programming time and cost associated with providing on- and off-peak kWh would not provide enough benefit to justify adding an item that was not considered necessary by the parties as part of the settlements. The on and off-peak kWh data is one of the items that is required to the extent the information is available; therefore, the Companies believe that they should only be *required* to provide total monthly kWh data, pursuant to the settlements.

C. Additional Issues

1. A mechanism for customers involved in a domestic violence or other dangerous situation to restrict access to their service address

The Companies currently provide a customer with the option to opt-off the ECL with all of the customer's information. It would be very difficult, if not impossible, for the Companies to be aware of, or to keep track of, when a customer is in a domestic violence or other dangerous situation, nor should such a task be the responsibility of an EDC. It is a customer's responsibility to decide whether or not to opt-off the ECL. The Companies believe the best approach to domestic violence and other dangerous situations is to allow a customer to opt-off the ECL completely, something that the Companies already do currently allow.

D. Non-consensus Issues

1. Customer Telephone Number

The Tentative Order requires customer telephone numbers to be included on the ECL, except when restricted by the customer in accordance with the Commission's Regulations at 52 Pa. Code § 54.8. The Companies are concerned about providing such information due to customer privacy issues. Including telephone numbers on the ECL was not considered by the parties, including EGSs, to be important enough to be included on the ECL that was ultimately agreed upon as part of the settlements. Therefore, the Companies do not believe that it is necessary to include telephone numbers on the ECL at this time.

2. Old Account Numbers

The Companies agree with the Commission's conclusion that old account numbers are of questionable value to be included on the ECL. The one-to-one mapping of accounts in the case of system-wide account number changes would be a better approach.

3. Capacity & Transmission Obligations

The Companies have committed to include the current Capacity and Transmission Obligations in the ECL that will be released in August. The Tentative Order requires future values to be included on the ECL after such values are calculated. The Companies' system uses the billing engine to provide the ECL information, and data not used in the billing process is not housed there until it is needed. To provide the future Capacity and Transmission Obligations as soon as they are calculated and place them on the ECL would necessitate additional programming, including significant time and resources, to draw the information from sources other than the Companies' billing engine. The Companies believe a better and more efficient method of providing future Capacity and Transmission Obligations after such values are

calculated would be to provide EGSs with a separate file with the future values, and/or post the information on the secure portion of the Companies' Supplier Support website.

III. CONCLUSION

The Companies appreciate the opportunity to provide comments on the Commission's Tentative Order regarding Interim Guidelines for Eligible Customer Lists

Respectfully submitted,

Dated: August 4, 2010



Bradley A. Bingaman
Attorney No. 90443
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, PA
(610) 921-6203
bbingaman@firstenergycorp.com

Counsel for:
Metropolitan Edison Company,
Pennsylvania Electric Company and
Pennsylvania Power Company

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by overnight United Parcel Service, as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Service by electronic mail, as follows:

Office of Competitive Market Oversight
Pennsylvania Public Utility Commission
ra-OCMO@state.pa.us

H. Kirk House, Esq.
Office of Special Assistants
Pennsylvania Public Utility Commission
hhouse@state.pa.us

Patrick Shaughnessy
Bureau of Conservation, Economics and
Energy Planning
Pennsylvania Public Utility Commission
pashaughne@state.pa.us

Dated: August 4, 2010



Bradley A. Bingaman
Attorney No. 90443
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6203
bbingaman@firstenergycorp.com

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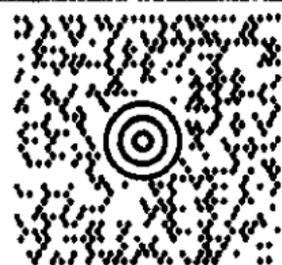
GLENN A COLDREN
(610) 921-6633
AE-1440
2800 POTTSVILLE PIKE
READING PA 19605-2459

LTR

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SHIP TO:

ROSEMARY CHIAVETTA, SECRETARY
(800) 692-7375
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