

PENNSYLVANIA PUBLIC UTILITY COMMISSION
Harrisburg, Pennsylvania 17105-3265

**Re: Investigation of
Pennsylvania's Retail
Electricity Market:
Intermediate Work Plan**

**Public Meeting: December 15, 2011
2237952 - DIR
Docket Number: I-2011-2237952**

STATEMENT OF COMMISSIONER CAWLEY

Before the Commission is a proposed intermediate work plan from our Office of Competitive Market Oversight (OCMO). This proposed work plan was developed based on input from stakeholders participating in the Commission's pending Investigation of Pennsylvania's Retail Electricity Market. The purpose of the plan is to improve the current retail electricity market. In designating this work plan as intermediate, OCMO proposes that most of the issues, tasks, and goals be resolved and implemented prior to the expiration of the electric distribution companies' (EDCs') next round of default service plans.

This intermediate work plan discusses EDC charges to EGSs for various coordination services although no substantive barriers relating to EDC charges to EGSs were identified during the technical conferences. As a general rule, it is difficult to assess whether this outcome is a result of various priorities, or whether there are no residual barriers related to EDC charges for coordination services. Consequently, it may be beneficial to invite comments on various inconsistencies in supplier tariffs related to the cost for access to historical customer and usage data, whether monthly or hourly. This is a concern, since a high cost of accessing historical data electronically, especially for commercial and industrial customers, could lead to less competition and less personally tailored pricing.

As an example, some utilities provide, according to their tariffs, no cost access to electronically requested historical customer and usage information, whereas other utilities may only provide this historical customer data on behalf of a customer to an EGS at no charge only once per calendar year. This places the EGS that first requests the data at a competitive advantage to subsequent EGSs requesting information for the same customer in close time proximity. Moreover, if data is requested electronically through automated processes, it is unclear if the magnitude of charges (often \$60 per account per the filed supplier tariffs) is justified. These high data charges may not actually be billed/imposed at this time, so it is not clear if that is the reason for the current lack of attention to these charges. Regardless, further information on these potential barriers, or other EDC charge barriers, would be welcome.

December 15, 2011



James H. Cawley
Commissioner