

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY
Consumer Advocate

May 29, 2012

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

RE: Investigation of Pennsylvania's Retail
Electricity Market
Docket No. I-2011-2237952

Dear Secretary Chiavetta:

Enclosed for filing please find the Office of Consumer Advocate's Comments on the Commission's Secretarial Letter of May 21, 2012 Concerning Statewide Consumer Education Mailings in the above-referenced proceeding.

If you have any questions, please feel free to contact me at the number listed above.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Aron J. Beatty'.

Aron J. Beatty
Assistant Consumer Advocate
PA Attorney I.D. # 86625

Enclosure

cc: Office of Competitive Market Oversight
Retail Markets Investigation (E-Mail only)

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

COMMENTS OF THE OFFICE OF CONSUMER
ADVOCATE ON THE COMMISSION'S SECRETARIAL LETTER
OF MAY 21, 2012 CONCERNING STATEWIDE
CONSUMER EDUCATION MAILINGS

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Dated: May 29, 2012

On May 21, 2012, the Commission issued a Secretarial Letter in the above-captioned docket concerning the timing of statewide, coordinated consumer education mailings. As part of its Retail Market Investigation, the Commission required each major Electric Distribution Company (EDC) to send three mailings to customers in 2012. The Commission had approved the first mailing in its December 15, 2011 Secretarial Letter, and a second and third mailing in its March 1, 2012 Intermediate Work Plan Order. The first mailing proceeded as planned in February 2012. As initially approved, a second mailing (the tri-fold mailer) was scheduled to be sent in May 2012. A third mailing (the EDC letter) was scheduled to be sent in October 2012.

Through the Secretarial Letter, the Commission proposes that the second mailing be postponed six months and sent in November 2012. The Commission further proposes that the third mailing be postponed approximately six months, into 2013. The Commission requested comments from interested stakeholders. The Office of Consumer Advocate (OCA) files these Comments in support of the Commission's proposed re-scheduling of the statewide mailings.

The Commission's reasons for these proposed changes is to reduce customer confusion and ensure that ratepayer funded consumer education efforts are as effective as possible. The Commission stated in its Secretarial Letter that it has received feedback from customers that indicates there is a high volume of material being mailed to customers concerning retail choice at this time. The Commission indicated that it is concerned that adding two more statewide mailings in a short period of time may overwhelm customers, thus creating a negative impression of retail choice. The Commission further indicated that pursuing the additional mailings under the existing schedule may not be the most cost effective use of ratepayer funds. The OCA fully agrees with these concerns.

The OCA submits that the Commission's proposal to spread the statewide mailings out over a longer period of time is reasonable, particularly in light of the feedback received to date. The OCA would caution, though, against setting specific dates for the next round of mailings at this time. The OCA recommends that the Commission continue to monitor the feedback it is receiving as a result of current consumer education efforts and in particular, consider the consumer education/information mailings that might be needed as a result of the pending Default Service Proceedings. The Commission should monitor the retail enhancement efforts coming out of the pending Default Service Proceedings to ensure that customer education materials are sequenced appropriately – both to ensure cost effectiveness of mailings and to reduce any negative perception of shopping due to customers being overwhelmed by materials. The OCA recommends that the Commission further coordinate the statewide mailings and the retail enhancement initiatives to avoid overwhelming consumers.

The OCA appreciates the opportunity to provide these Comments. For the reasons explained above, the OCA supports the Commission's decision to postpone the statewide mailings. The OCA submits, however, that the Commission should refrain from rescheduling these mailing on specific dates, and instead continue to coordinate the education efforts with other competitive enhancement programs.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Aron J. Beatty". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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