

PENNSYLVANIA ENERGY MARKETERS COALITION

May 29, 2012

Rosemary Chiavetta
Secretary, Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Dear Secretary Chiavetta:

Please find enclosed the Comments of the Pennsylvania Energy Marketers Coalition, in response to the Pennsylvania Public Utility Commission's Secretarial Letter of May 22, 2012, in the matter of the coordinated education mailings under the Intermediate Work Plan for the Investigation into Pennsylvania's Retail Electricity Market (Docket No. I-2011-2237952). Please do not hesitate to contact me with any questions or concerns regarding our Comments.

Sincerely,



Frank Caliva III
Regulatory Consultant
Pennsylvania Energy Marketers Coalition (PEMC)

Senior Consultant, Public Affairs &
Strategy Development
Strategic Communications, LLC
1012 14th Street NW, Suite 1106
Washington, DC 20005

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation of Pennsylvania’s Retail Electricity Market:)
Intermediate Work Plan – Coordinated Education Mailings) Docket No. I-2011-2237952

COMMENTS OF THE PENNSYLVANIA ENERGY MARKETERS COALITION

INTRODUCTION

Pursuant to the Secretarial Letter of May 21, 2012, the Pennsylvania Public Utility Commission (“PUC,” or “Commission”) seeks Comments on a proposed change to the Final Order (“Order”) issued on March 1, 2012, regarding the proposed Intermediate Work Plan for the ongoing Investigation of Pennsylvania’s Retail Electricity Market (“RMI” or “investigation”). This work plan was developed by the Office of Competitive Market Oversight (“OCMO”) with significant input from stakeholders and participants in the technical conferences led by OCMO as part of the RMI process.

The proposed changes to the Final Order include: (1) a delay in mailing a tri-fold brochure promoting PAPowerSwitch.com to Pennsylvania consumers from May 2012 to November 2012; and (2) a delay in mailing a letter from each electric distribution company (“EDC”) to customers, further promoting PAPowerSwitch.com and emphasizing that customers who chose to shop will continue to receive safe and reliable distribution service, from October 2012 to a date in 2013 to be determined.

According to the Secretarial Letter, the rationale for the proposed changes is that the Commission has received feedback from consumers that while choice education efforts (such the February 2012 Commission-endorsed postcard that was mailed to consumers statewide) are effective, the volume of mail received by Pennsylvanians related to choice can be “overwhelming.” The PUC is concerned that additional mailings too soon this year could result in customer frustration and even a degrading of the public’s perception of choice.

The Pennsylvania Energy Marketers Coalition (“PEMC”)¹ appreciates the opportunity to provide Comments to these proposed changes to the Final Order on the Intermediate Work Plan. We continue to be appreciative of the hard work of OCMO and the vision of the Commission in developing a serious, comprehensive approach to enhancing the competitiveness of the retail electricity market in the Commonwealth, particularly with regard to consumer education.

AGREE WITH DELAY, BUT REQUEST RE-EVALUATION IN THREE MONTHS

The members of the PEMC are pleased to hear that the initial postcard campaign launched in February 2012 – which we provided direct assistance with in terms of messaging - was successful in reaching consumers, significantly increasing traffic to PAPowerSwitch.com, and generating feedback and inquiries from Pennsylvanians seeks to learn more about choice and shopping. We also appreciate the Commission’s desire to implement consumer education the right way, even if that means taking a more measured approach than was originally envisioned. It is critical that choice empower consumers, not overwhelm them, so on balance a delay in the second and third education mailings is reasonable.

We offer one suggestion, however. Instead of definitively determining to postpone the next two mailings for six months, the PEMC recommends that the PUC should re-evaluate the timeline for the mailings in three months. If, based on inquiries to the Commission call center, the volume of traffic to PAPowerSwitch.com, and the customer interactions of EDCs and suppliers, it appears the initial benefits of the first postcard mailing have worn off the Commission could then re-evaluate whether to initiate the second and third mailings sooner than November 2012 and a date in 2013 to be determined.

¹ For purposes of this filing, the PEMC consists of Agway Energy Services, LLC (“Agway”), Energy Plus Holdings LLC (“Energy Plus”), Interstate Gas Supply, Inc. (“IGS”), and Pennsylvania Gas & Electric (“PAG&E”). PEMC members supply electricity, natural gas, and various other energy services to residential and commercial customers across a large number of utility markets throughout several states. PEMC works collaboratively on non-competitive, regulatory issues to advance competitive markets and consumer choice.

We also want to emphasize that the need for a larger, comprehensive consumer education campaign across the Commonwealth remains and that planning for this effort should continue in earnest even while these mailings are delayed.

CONCLUSION

The PEMC appreciates the significant amount of work that has been undertaken by the Commission and its Staff in developing both this consumer education effort as well as the RMI in general. This is an historic undertaking and a unique opportunity for the Commonwealth to create a truly competitive marketplace for electricity to the benefit of all Pennsylvania consumers. The PEMC pledges its continued support for this effort.

May 29, 2012

Respectfully submitted,

PENNSYLVANIA ENERGY MARKETERS COALITION



Frank Caliva, III
Regulatory Consultant
Pennsylvania Energy Marketers Coalition (PEMC)

Senior Consultant, Public Affairs &
Strategy Development
Strategic Communications, LLC
1012 14th Street NW, Suite 1106
Washington, DC 20005



Michael F. Meath
Regulatory Consultant
Pennsylvania Energy Marketers Coalition (PEMC)

President
Strategic Communications, LLC
3532 James Street, Suite 106
Syracuse, New York 13206

CC: PEMC Distribution List (below)

Pennsylvania Energy Marketers Coalition (PEMC)

Agway Energy Services, LLC

Energy Plus Holdings LLC

Interstate Gas Supply, Inc.

Pennsylvania Gas & Electric

Distribution to PEMC Members:

Anthony Cusati, III

Director of Regulatory Affairs, Eastern Division

Interstate Gas Supply, Inc.

Heather Farber

Senior Director

Energy Plus Holdings, LLC

Karen Boltz

Director, New Markets

Energy Plus Holdings, LLC

Michelle Mann

Compliance Paralegal

Pennsylvania Gas & Electric

Terence McInerney

Director of Operations

Agway Energy Services, LLC

Mark J. Pitonzo

Director of Business Development

Agway Energy Services, LLC