

January 18, 2013

VIA ELECTRONIC FILING

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

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

Dear Secretary Chiavetta:

On December 20, 2012, the Pennsylvania Public Utility Commission ("Commission") issued a Secretarial Letter at the above-referenced docket ("December 20 Secretarial Letter"), proposing to dispense with the annual mailing of the Commission-endorsed postcard for 2013, with the mailing to resume in 2014. In addition, the Commission advised in its December 20 Secretarial Letter that electric distribution companies ("EDCs") not seek cost recovery for these postcard mailings through the filing of new consumer education plans or extending existing plans, but rather suggests that recovery be sought through other avenues, including base rate proceedings.

Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power") and West Penn Power Company ("West Penn") (collectively "the Companies") do not oppose the Commission's proposal to dispense with the mailing of the annual postcard in 2013. The Companies support EDCs facilitating continued consumer education regarding the benefits of shopping, to include resuming the postcard mailing in 2014, to the extent that EDCs are assured full and current recovery of the costs associated with that education. To that end, EDCs should be allowed to recover these costs through existing Section 1307(e) automatic adjustment riders rather than through base rate proceedings. Recovery of consumer education expenses through base rate proceedings would require EDCs to unfairly shoulder the costs of these mailings without concrete assurance of future recovery and would be tantamount to an unfunded mandate.

Therefore, the Companies intend to recover the costs associated with consumer education, including the postcard mailing, through reconcilable riders, such as the Default Service Support Riders that were filed in the Companies' most recent default service proceedings at Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669 and P-2011-2273670 and approved on August 16, 2012. Moreover, while the Companies do not object to allowing EDCs' existing consumer education plans to expire without renewing or submitting new plans,

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the Companies believe that EDCs should be permitted to maintain their existing customer education cost recovery riders for purposes of recovering Commission-mandated customer education in the absence of an alternative mechanism allowing for full and current cost recovery.

Please contact me if you have any questions regarding this matter.

Very truly yours,


Tori L. Giesler

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c: r-RMI@pa.gov (via electronic mail)