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May 20, 2013

VIA ELECTRONIC FILING

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

***Re: EDC Customer Account Number Access Mechanism for EGSs;
Docket No. M -2013-2355751***

Dear Secretary Chiavetta:

Pursuant to the Commission's Tentative Order entered April 18, 2013 in the above-referenced proceeding, enclosed herewith for filing are the Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company.

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

Very truly yours,


Tori L. Giesler

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Enclosures

c: As Per Certificate of Service
Dan Mumford – Bureau of Consumer Services
Patricia Wiedt – Law Bureau

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDC Customer Account Number Access : **Docket No. M-2013-2355751**
Mechanism for EGSs :

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

I. INTRODUCTION

On April 18, 2013, the Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Order (“Tentative Order”) in the above-captioned docket seeking comments regarding a proposal to provide for procedures facilitating electric generation supplier (“EGS”) access to electric distribution company (“EDC”) customer account numbers in those instances where EGSs cannot access the account number from the Eligible Customer List (“ECL”) and the customer has not provided it.

Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, “the Companies”) respectfully submit the following comments in response to the Tentative Order.

II. COMMENTS

Currently, in order for an EGS to enroll a customer an EGS must provide the EDC with a valid account number, in addition to other information. Typically, the EGS would obtain this account number either directly from the customer or from the ECL. The Tentative Order suggests that EGSs should be permitted to access customer account numbers through the EDC

(rather than it being provided by the customer) upon providing other customer information to an EDC so that the EGS can then use the account number to enroll a customer.

As a threshold matter, the Companies have concerns with the ability of EGSs to essentially end-run the ECL and its opt-off protections with the implementation of an alternative as suggested by the Tentative Order. It is worth pointing out that in the Companies' territories, the ECL opt-off rate currently varies between 25% and 46%. There are multiple reasons customers choose to opt off of the ECL, although it cannot be overlooked that a primary goal of the opt-off ability is providing customers the ability to protect their personal data. What the Tentative Order now proposes is an approach by which EDCs will provide that information to EGSs, even where customers have previously opted off of the ECL. This creates the potential for violations of the safeguards that customers believe they will retain at the time that they opt off of the ECL. While the Companies support the development of a mechanism to provide customer account numbers to EGSs in discrete instances where a customer elects to shop and has previously restricted their information, EGSs should be required to properly notice customers at the time of consent to enrollment that such consent will remove those safeguards as to the particular EGS with which they are choosing to enroll. Also, EDCs should not be held accountable for disclosing information obtained by EGSs through any mechanism developed as a result of this proceeding. Further, EGSs should be required to continue using the ECL and the customer as the primary source of customer information and any mechanism developed as a result of this proceeding should be limited to those discrete instances in which the customer account number cannot be accessed through any other means.

Variation Among Utilities

Given the variations in EDCs' customer information systems, any approach adopted by the Commission should provide flexibility in allowing EDCs to develop individual solutions to provide

EGSs with account numbers that are most cost effective and efficient within the context of their own existing systems. From the Companies' perspective, a secure supplier website is the most efficient mechanism through which EDCs are able to provide an account number to suppliers that is not otherwise available on the ECL based upon cost, security and response time considerations. The Companies already have a secure supplier website which provides instantaneous access to customer information. Therefore, if the customer account requests at issue in this proceeding were incorporated into this existing website, concerns regarding the timeframe for EDC response would be minimized to a large extent. The same could not be said for other methods such as an electronic data interchange ("EDI") solution, which would involve a comparably significant response lag. A web solution would also be more cost effective than an interactive voice response ("IVR") model, would not require additional EDC resources (i.e. manpower) to respond to requests, and would allow a more efficient means for EGSs to resubmit corrected names/addresses where first submitted incorrectly. Also, a secure website would enable the Companies to maintain the same safeguards as the process currently used for customer access to account information through the Companies' call center.

Identifying Data and Precision

The process in place today for a customer caller to receive their account information requires the customer to provide his or her name, address and phone number. If that is not possible, the customer must then provide the last four digits of his or her of social security number, their account number, their last billing amount or their last payment amount. Presently, the Companies' call center will not provide account information to a supplier claiming to have written or verbal authorization from the customer without a customer also being available to provide authorization in order to ensure the security of customer information.

So that security of customer data is not compromised through the development of an account number access mechanism, EGSs should be required to obtain a completed LOA from the new customer that requires the customer, provide their first and last names, street address, city, and zip code, followed by the customer's signature. LOAs should also contain a disclosure statement indicating that by signing the form, the customer gives the benefitting EGS the right to obtain the associated customer information from the EDC. The Companies' solution as proposed gives EGSs secure access to search a list of customers not otherwise found on the ECL. By requiring this content on the LOA, EGSs are also ensured they have the requisite information necessary to execute a search for the customer's account number once they access the secure supplier website. A search will require a customer name, street address, city, zip code and confirmation that an LOA for the customer has been obtained. The identifying information entered in the search will need to precisely match the customer record – a requirement that is a function of technological necessity for such systems and not given to significant discretion.

Letters of Authorization

Under the Companies' Supplier Tariffs as approved, written, electronic or telephonic customer authorization is required from the requesting supplier, or attestation from the supplier that it has such authorization, in order to gain access to information requiring an LOA. Currently, if a Customer is not available to give authorization to the EDC call center, the EGS is directed to Supplier Services, which does not require a supplier to provide an LOA but may ask an EGS to verify that it has obtained a valid LOA. The Supplier Tariffs further require EGSs to maintain records of the Customer's authorization in the event that a dispute would arise in order to provide documented evidence of authorization, which documentation must be provided to the Commission or respective Company upon request.

For an EGS to access customer numbers as contemplated by the Tentative Order, this process should apply as well. EDCs should not be required to verify the existence of or review the content of an LOA. The Companies' proposed solution requires attestation from the EGS that it has obtained an LOA. As a further precaution to the EDCs and consistent with practices for other customer information, the Commission should require a supplier to provide an LOA for any informal or formal complaints lodged against the EDC associated with account numbers obtained through this channel.

Reporting Requirements

Apart from the requirement that EGSs produce signed LOAs in instances of disputes arising from any adopted mechanism, the Companies take no position with regard to reports to be required from EGSs. EDCs should not be subject to additional reporting requirements due to the development of such a mechanism, as this unduly burdens the EDCs and exposes them to further obligation and risk where the burden for effecting enhancements has already been incurred by those companies.

Appropriate Sales Channels

There is no way for a EDC to police appropriate sales channels. Certified EGSs that have access to the secure portion of the website will be able to query the list of customers not on the ECL for any of their needs.

Solution Development Process, Costs and Timeline

The costs to implement and maintain a list of customers not otherwise found on the ECL for access through their secure supplier website would be less than \$1 million, as well as ongoing maintenance and administrative costs. Regardless of the approach directed, EDCs must be guaranteed full and current recovery of all costs to implement any access mechanism through a non-

bypassable rider such as the Companies' Default Service Support Riders. Further, the implementation of each EDC-specific solution should be set for no earlier than the later of: (i) twelve months following the entry of a final Commission order detailing an approved current cost recovery mechanism and guidelines for implementation; or (ii) if EDCs are directed to conduct stakeholder meetings, twelve months following the last stakeholder meeting. Flexibility and consideration should also be granted to the various overlapping demands on EDCs at this time with regard to the multiple system improvements being sought in an effort to advance retail markets in Pennsylvania, such that a proper prioritization of these improvements can be achieved.

II. CONCLUSION

Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company appreciate the opportunity to provide comments regarding a proposal to provide for further EGS access to customer account numbers.

Respectfully submitted,



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Dated: May 20, 2013

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDC Customer Account Number Access : Docket Nos. M-2013-2355751
Mechanism for EGSs :

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 first class mail, as follows:

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Dated: May 20, 2013



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