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VIA FEDERAL EXPRESS

May 20, 2013

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is an original copy of PPL Electric's comments in the above-captioned proceeding.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on May 20, 2013, which is the date it was deposited with an overnight express delivery service as shown on the delivery receipt attached to the mailing envelope.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions, please call me or Renae G. Yeager, PPL Electric Utilities' Director-Distribution Regulatory & Business Affairs, at (610) 774-5347.

Very truly yours,

Paul E. Russell

Enclosures

cc: Dan Mumford
Patricia Wiedt, Esquire

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MAY 20 2013

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION

I. INTRODUCTION

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) offers the following Comments and responses to the Public Utility Commission’s (“Commission”) Tentative Order in the above referenced proceeding, issued on April 18, 2013.

PPL Electric has been an active participant in the Commission’s process for encouraging competition and ensuring the safety of customer information. PPL Electric appreciates the opportunity to provide input to the Commission’s deliberations in this matter.

II. BACKGROUND

PPL Electric is a public utility and an Electric Distribution Company (“EDC”) as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 102, 2803. PPL Electric furnishes electric distribution, transmission, and default service electric supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

The Company understands that some Electric Generation Suppliers (“EGS”) marketing practices take place in a setting where customers do not have their utility account number easily accessible. In these situations, the EGS uses the Company’s Eligible Customer List (“ECL”) to

search for the account numbers of newly signed customers using information such as the customer's name, address, etc. This practice is important as the account number is needed for the EDI enrollment process between the EGS and EDC. If the customer has opted out of having their information on the Company's ECL, the EGS would need to contact the customer for their account number which can result in a poor customer experience including potentially delaying the start of service with the EGS by one or more bill cycles. Prior to the Tentative Order for EDC Customer Account Number Access Mechanism for EGSs (Docket M-2013-2355751), PPL Electric's guidance to EGSs was to have the customer call the Company's call center (1-800-DIAL PPL) at the point of sale to request their account number and relay it to the EGS. PPL Electric is supportive of implementing a process for EGSs to request the account number of customers for whom the EGSs have a signed Letter of Authorization ("LOA") and customers have opted out of the Company's ECL.

PPL Electric has participated in a number of discussions with EGSs and other EDCs which were aimed at understanding EGSs' needs and defining how this process could be implemented. The issue of EGSs accessing customer account numbers was first raised by Green Mountain Energy Company on OCMO's July 26, 2012 Committee Handling Activities for Retail Growth in Electricity ("CHARGE") conference call. Resulting from this call, PPL Electric participated in a conference call hosted by PECO Energy with interested stakeholders on August 21, 2012. The purpose of the conference call was to allow Green Mountain Energy Company to present the issue along with a proposed process for account number look up and to solicit *feedback from stakeholders*. PECO Energy provided an update of the conference call back to CHARGE and in subsequent months EDCs provided feedback to CHARGE on Green Mountain Energy Company's proposed process. PPL Electric is supportive of Green Mountain Energy

Company's proposed process and the Company's suggested solution described in these comments closely reflects the process that has been proposed.

III. COMMENTS

It is the Company's opinion that the frequency and volume of use of the proposed process will be low. The Company holds this opinion because its ECL opt out rate is low (approximately 11%) and because it believes that the process is only applicable to certain types of EGS marketing practices. The Company believes that the ECL continues to be a more efficient way for EGSs to look up account numbers for those customers who have not opted out from being on the Company's ECL. For this reason, the Company proposes leveraging an internal reporting solution to look up account numbers for requesting EGSs. The process will allow EGSs to email the Company once per week to request account numbers for up to 500 customers. By leveraging this process, the Company estimates minimal to no capital investment will be required. PPL Electric recognizes that the factors leading to this recommended solution are specific to the Company's market and systems environment. While PPL Electric is supportive of developing a uniform "front end" (such as a common set of input fields) to this process to allow some uniformity to EGSs, the Company believes that the manner in which the process is implemented should be left to the determination of each EDC.

With regard to the specific questions posed by the Commission in its Tentative Order on pages 9 and 10, PPL Electric responds as follows:

1. EDCs may propose using different technologies to provide account numbers. If so, how much variation among utilities would be too confusing or burdensome upon the suppliers using the systems?

PPL Electric recognizes that systems and market conditions vary across EDCs and therefore it suggests that each EDC should be given latitude to implement the solution that best fits their unique circumstances. The Company believes that a common “front end” (such as common input fields and format) can be developed which will help streamline the input process for EGSs but still allow EDCs to implement a process specific to their individual environments.

2. Technologies that have been discussed include the internet, interactive voice response (IVR) telephone and electronic data exchange (EDI). Are some technologies preferable to others and if so, why?

PPL Electric currently offers an IVR solution that allows customers to obtain their account number. The Company suggests that this solution could be used by customers seeking to sign up with an EGS at the EGS’s point of sale. PPL Electric prefers a solution that involves the EGS emailing the Company a spreadsheet which the Company will utilize in conjunction with its reporting tools to provide account numbers back to the requesting EGS. This solution is very similar to the process which has been proposed by Green Mountain Energy Company to OCMO.

3. In providing account numbers, should there be limits on the response time back from the EDC, and if so, should the timeframes be dependent upon the technology being used?

A customer can call 1-800-DIALPPL during business hours M-F 8am to 5pm to access their account number. Regarding PPL Electric’s proposed reporting-based solution, PPL Electric can support weekly batches of no more than 500 names per supplier along with a 3 business day turnaround.

4. What specific identifying data should a supplier be required to submit to the EDC to get an account number? At a minimum, should a customer’s name and address be required?

PPL Electric recommends a customer’s full name (as it shows on the PPL Electric bill), primary phone number, and service zip code.

5. What level of precision is necessary to ensure accurate data?
To get an accurate match requires a high level of precision, due to differences in name spelling and abbreviations. A multipoint match must be used to achieve a high level of precision. PPL Electric recommends using a multipoint match on a customer's full name, phone number, and service zip code. Only exact matches will result in an account number being provided to suppliers. The EGS will be notified of which matches were not exact and require re-submittal.

6. The amount and recovery of costs could vary by EDC and by the technology used. If there are significant costs, can they be estimated at this time? Who should be responsible for those costs and what mechanisms should be used to assess and collect costs?
The cost of implementing PPL Electric's recommended solution would be minimal, as the Company currently has a process in place which can be leveraged without system enhancements to fulfill supplier account lookup requests. PPL Electric would seek cost recovery for any solution that results in the need for enhancing existing systems or developing a new system.

7. What safeguards are needed to ensure that account numbers are accurately communicated and provided only to the customer and supplier involved?
PPL Electric believes that there should be a multi-point match of a customer's full name, phone number and service zip code before it releases the account number to an EGS to ensure that only the appropriate accounts get transmitted to suppliers. Should multiple accounts or no matches be found, the EGS will be notified and will have to resubmit the request with more refined identifying information. Additionally, if an account is found to be present on the ECL, the supplier will be informed that the account number can be found on the ECL and, as such, the Company will not provide that customer's account number to the EGS.

8. What information and format should be required in an LOA?

PPL Electric recommends at a minimum obtaining the customer's full name, service address, primary phone number, a customer signature, purpose of the LOA, the effective date of the LOA and the expiration date of the LOA. PPL Electric recommends that the OCMO LOA working group provide additional guidance on this topic.

9. Are there possible reporting requirements that should be developed so that the Commission can monitor the effectiveness and security of the systems? This could include things like the total number of account numbers provided and the number of complaints or problems associated with the provision of account numbers under these mechanisms.

PPL Electric anticipates handling this request for customer data in a similar manner to other data requests made daily to the Company by EGSs and does not see a need for additional reporting requirements. The Company also plans on handling any customer complaints as part of its existing complaint handling process.

10. What are the appropriate sales channels that would be authorized to use this process?

PPL Electric does not plan to monitor which sales channels use the account lookup process.

11. What process should the EDCs use to develop their solutions, including the level of stakeholder involvement and Commission oversight?

PPL Electric has participated in a number of discussions in the past year on this topic which were aimed at understanding the needs of the EGS community and discussing process implementation options. This included a conference call with EDCs and interested EGS stakeholders on August 21, 2012. Due to differing market environments and systems capabilities among EDCs, the Company believes that each EDC should be afforded the opportunity to implement a process which best fits their environment. PPL Electric suggests that each EDC provide a description of their process to OCMO and EGSs via a monthly CHARGE

conference call, as well as provide a description of their process on the EDC's supplier web site.

12. What are reasonable timeframes for the development and implementation of these systems?

PPL Electric can implement its proposed solution within 30 days of requested implementation. Should PPL Electric be directed to implement system changes for a more complex solution, the Company would need to evaluate a timeframe specific to the solution being implemented.

13. Are there any other concerns, suggestions or questions that the Commission needs to address?

PPL Electric appreciates the opportunity to file comments on this matter and looks forward to working collaboratively on reaching a final resolution to this issue.

IV. CONCLUSION

For the reasons set forth above, PPL Electric Utilities Corporation respectfully requests that the Commission consider these Comments when preparing its Final Implementation Order.

Respectfully submitted,



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Date: May 20, 2013

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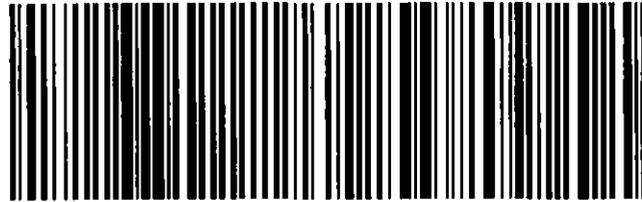
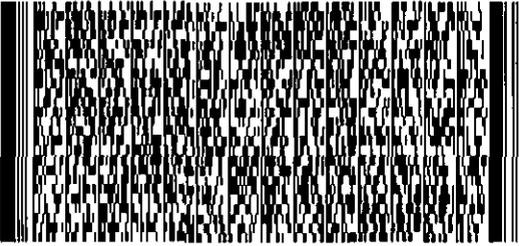
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