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December 18, 2013

**VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: EDC Customer Account Number Access Mechanism for EGSs**  
**Docket No. M-2013-235751**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is the **PECO Energy Company's Filing regarding Customer Account Number Access Mechanism for EGSs** and associated **Certificate of Service**.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Williams", written over a horizontal line.

W. Craig Williams  
Assistant General Counsel

Enclosures

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**EDC CUSTOMER ACCOUNT NUMBER** :  
**ACCESS MECHANISM FOR EGSs** : **M-2013-2355751**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of PECO Energy Company's Compliance Filing Regarding Customer Account Access for EGSs on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

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Date: December 18, 2013

*Counsel for PECO Energy Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**EDC Customer Account Number** :  
**Access Mechanism for EGSs** : **DOCKET NO. M-2013-2355751**  
:

**PECO ENERGY COMPANY'S COMPLIANCE FILING  
REGARDING CUSTOMER ACCOUNT NUMBER ACCESS FOR EGSs**

**I. INTRODUCTION**

PECO Energy Company ("PECO" or the "Company") hereby submits this Compliance Filing Regarding Customer Account Number Access for EGSs ("Compliance Filing"). PECO submits this filing in accordance with the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Final Order on an EDC customer account number access mechanism for EGSs ("Final Order") entered July 16, 2013.<sup>1</sup>

The Compliance Filing details PECO's plans for developing a passcode protected website portal that will provide EGS access to customer account numbers for customers whose account information is not available from the customer or from the Eligible Customer List ("ECL"). The Compliance Filing also addresses the costs of developing the website portal and the mechanism for recovering those costs. PECO requests approval of the Compliance Filing and recovery of costs through the proposed cost recovery mechanism.

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<sup>1</sup> *Final Order: EDC Customer Account Number Access Mechanism for EGSs*, Docket No. M-2013-2355751 (July 16, 2013).

## II. BACKGROUND

Through the Commission's Committee Handling Activities for Retail Growth in Electricity ("CHARGE"), an issue was raised by an EGS as to how it might obtain a customer's account number for a new-customer enrollment when the customer is not on the ECL and the customer is unable to provide their account number.<sup>2</sup> EGSs reported that the experience is fairly common, particularly in the context of sales at public locations and community events (such as shopping malls and trade shows), where customers will not have such account information in their possession.<sup>3</sup>

While the EGS has the ability to query the ECL for customer information, customers can opt-out of having their information listed in the ECL, which means that queries of the ECL by the EGS will not be successful.<sup>4</sup> Because the customer account number is an essential piece of information during the EGS enrollment process, customers who do not have their account-number information and who are not on the ECL will not be able to complete the application process at a public location point of sale.<sup>5</sup>

In its Final Order, the Commission indicated that the inability to obtain customer account numbers in these forums was an impediment to competitive shopping.<sup>6</sup> After a stakeholder process involving some EGSs, the EDCs and OCMO/CHARGE, and a comment period on a tentative order, the Commission issued this Final Order. The Final Order directed (among other things) EDCs to submit a compliance filing within six months of entry of the Final Order to develop a passcode protected secure website portal for EGSs to obtain account-number

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<sup>2</sup> *Final Order* at 2.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.* at 2-3.

<sup>5</sup> *Id.* at 3.

<sup>6</sup> *Id.* at 3, 12-13.

information for customers who are not on the ECL.<sup>7</sup> In accordance with the Final Order, other key requirements of the passcode protected secure website portal and related compliance plans shall include the following:<sup>8</sup>

- The portal should be set up so as to require an EGS to submit the customer’s full name, service street address and five-digit postal code;
- The portal should document the EGS’s attestations that they are enrolling the customer in a public location and that they have obtained photo identification and a signed letter of authorization (“LOA”) from the customer;
- There should be a field on the secure website portal that documents the form of customer identification provided;
- The portal should return the requested account number, or if a precise match is not possible, an error message indicating what generated the error;
- The mechanism should keep track of the usage of the system and be able to identify who accessed what data and when;
- The information should be retained for three years, and that information should be easily provided to regulators upon request;
- The website portal will provide EGSs access to customer account numbers for all EDC rate classes; and
- The website portal shall be operational no later than May 2014.

In addition, the EDCs shall discuss in the compliance filing the expected costs and proposed mechanism for recovering these costs.<sup>9</sup>

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<sup>7</sup> *Id.* at 49.

<sup>8</sup> *Id.* at 49-50.

<sup>9</sup> *Id.* at 49.

### **III. PECO'S CUSTOMER ACCOUNT NUMBER ACCESS COMPLIANCE PLAN**

#### **A. PECO's Proposed Mechanism**

The Final Order directs that EDCs shall have the passcode protected secure website portal in place and operational by May 2014, in advance of the 2014 outdoor-marketing season. PECO will meet that obligation by enhancing its existing Supplier Customer Choice Energy Systems Solution ("SUCCESS") website portal (<https://success.peco.com>) to host the requested account number access mechanism.

The SUCCESS portal is a passcode-protected, secure website used by PECO to coordinate the delivery of competitive energy supply with EGSs. EGSs already have organization-specific credentials they use to log into and use the service. For security reasons, PECO limits distribution of each organization's credentials to a specific number of individuals within the EGS's organization who are then responsible for management of those credentials within their organization. Therefore, users of the proposed account number access mechanism hosted on the SUCCESS portal will continue to coordinate with the credentialing managers in their organization to access customer account information, as is the current practice.

Within the SUCCESS portal, PECO will build a process that permits the EGSs to submit account number requests by uploading a delimited file, which may contain a maximum of 500 individual account number requests. PECO will provide detailed instructions and a sample file format to EGSs on its SUCCESS website prior to implementation. Once an EGS submits a request, PECO will deliver that file back to the EGS's web browser as text in near-real-time (in seconds) with a response appended to each individual request in the file. The EGS may re-submit requests as often as necessary, although PECO's SUCCESS website will not permit submission of an additional request until results on the earlier request have been delivered.

PECO does not intend to set a maximum number of requests that an EGS may submit, but PECO reserves the right to address reasonable technical or security issues that may arise.

At a minimum, PECO will require EGSs to provide the customer's full name, service street address and five-digit postal code for each request. PECO's file format will also include optional fields where an EGS may provide a second service street address or an additional customer name, if available. While not required, these fields may improve the likelihood of locating a match on the customer account.

With each request for account information, PECO will require an attestation that the EGS is enrolling the customer at a public location and that the EGS has obtained both photo identification and a signed LOA from the customer. PECO will also require the EGS to indicate the form of photo identification provided by the customer for each request. PECO will accomplish the attestation by requiring the EGS to check a box on the secure website portal, indicating that the EGS has obtained both the photo identification and signed LOA for each entry on the uploaded file. Checking the attestation box will be necessary before the SUCCESS web portal will accept an EGS request. PECO will archive the attestation relative to each customer request listed in the uploaded, delimited file.

To complete the lookup, an exact match will be required for the Customer's Full Name, Address Line 1, Address Line 2 (if applicable), and Five-Digit Postal Code. All variances (with the exception of upper versus lower case letters) will result in a mismatch. Such rules are necessary to protect customer privacy by avoiding, when possible, inadvertent release of erroneous account numbers belonging to other customers. If no match or multiple matches are found initially, and the EGS has provided additional customer information in the available fields, PECO will repeat the search using the additional information.

## **B. Match Requirements**

In the Final Order, the Commission asked that the EDCs consider the use of “wildcards” (permitting an EGS to search by the root of the requested information, such as “Jo\*” to search for “Joe: and “Jospheh”) for name searches.<sup>10</sup> With respect to wildcards for name searches, as the Commission noted, false returns risk a compromise of security, and the Commission directed that the use of wildcards to fill in a customer’s name should not be used if such use will “significantly increase the risks of false returns or too many results causing excessive ‘multiple hit’ errors.”<sup>11</sup> PECO agrees that there is great risk of false returns, and those false returns might come in very high volumes. One need only consider the myriad of invalid permutations of a search for John Smith that is submitted as “Jo\* Sm\*.” These false returns risk compromise to system security and customer privacy, without reasonable means to mitigate that risk. Therefore, PECO will not utilize wildcards for customer-name information searches.

The Commission also directed that EDCs consider either standard United States Postal Service formats (“USPS”) and/or the use of wildcards for service street address matching.<sup>12</sup> PECO intends to leverage USPS-compliant data within the account number access mechanism to the largest extent possible.

PECO will ask EGSs to provide service street address data in USPS-compliant formats in their requests (with the exception of the postal code four-digit suffix, as noted by the Commission). Of course, a search based on address information is limited by the quality of the information provided by the customer during the original service enrollment. While an EGS may query a USPS-compliant address in the account-number lookup, the information submitted by the customer – and entered into the PECO system – may not be USPS compliant, which will

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<sup>10</sup> *Id.* at 25-26.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.* at 25.

result in no successful return even though it appears to the EGS and customer that the submitted information is completely valid.

However, for information-security and cost reasons, PECO will not make use of wildcards for the address query of the account number lookup. The file upload that PECO will use on its website will include separate service address fields for the street address (e.g., 2301 Market Street) and the five-digit postal zip code respectively. Because PECO systems do not separate the street address elements (for example, separating “2301 Market” into one field and “Street” into another), PECO cannot separate those fields in the lookup file that will query the PECO system.

Additionally, if PECO were to allow the EGS to use wildcards in the street address field for the uploaded file, the EGS would have the ability to enter *only* the wildcard character in this field, leaving the entire address as a wildcard. A name combined with the five-digit postal code would match every single service address containing that name within the postal code. It would be analogous to removing the service street address field from the search completely. Allowing a wildcard, therefore, significantly increases the risk of too many false positives (i.e., “Multiple Hits”) and increases the likelihood that PECO would be unable to determine a precise match for the lookup. It also significantly increases the risk of PECO inadvertently providing an account number for a different customer. As a result, PECO will not utilize wildcards for service addresses so as to mitigate the risk of inadvertently releasing incorrect customer information.

### **C. Responses to Queries**

In the Final Order, the Commission requires that EDCs provide one of three possible responses to each request: an account number for a precise match; “NO HIT”, if no data matches

the inquiry; or “MULTIPLE HITS”, if multiple customer records match the inquiry.<sup>13</sup> In the case of “NO HIT” or “MULTIPLE HITS”, the Final Order requires that the response from the EDC identify the field or fields that caused the search to fail.<sup>14</sup>

For those instances where a search yields no return (i.e., “NO HIT”), there is no means of determining why a search failed. It was a search for null information, meaning that a search was conducted for which there was no known record. If the search fails to find a record (null information), there is no way to determine why the search failed without knowing the record that was the intended result (against which the search may then be compared). Because of this, PECO will be not able to provide the fields that resulted in the unsuccessful, null search. However, to provide the requesting EGS with useful information about why a request might have failed, PECO intends to expand the range of possible responses as follows:

- “*INVALID REQUEST*” – Provided if PECO is unable to interpret the information provided in a request. This could occur if the EGS formats a request record within the file incorrectly (for instance, using an incorrect delimiter or no delimiter at all).
- “*MISSING DATA*” – The EGS does not enter any information for a field requiring information, such as the customer’s full name, Line 1 of the service street address, the five-digit postal code, or the form of customer identification received.
- “*NO HIT*” – No precise match exists for the inquiry. As noted above, it will not be technically feasible to tell an EGS what field or fields caused the request to fail. Such a requirement suggests that PECO already knows what account number satisfies the original request, which it cannot know since there is insufficient or incorrect information.
- “*MULTIPLE HITS*” – Multiple PECO customer records precisely match the inquiry.
- “*ON ECL*” – Provided if PECO finds a precise match but also finds that the matched account number is available on its ECL. The account number access

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<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

mechanism is available only when the associated account number is not available from either the customer or from the EDC's Eligible Customer List.<sup>15</sup>

- *EDC Account Number* – PECO locates a precise match, and the account number is not available on PECO's ECL.

PECO will provide EGSs with the ability to re-submit requests as often as necessary with corrected name and address information. It still may be necessary for the EGS to follow up with the customer to obtain accurate information.

Per the Final Order, PECO will maintain a record of all data provided, including each request, PECO's response, the organization submitting the request, and when the request was made. PECO will maintain this information for no less than three years. PECO will also have the capability to provide a subset of this information to regulators upon request.

#### **IV. PLAN COSTS AND COST RECOVERY**

PECO currently estimates the total implementation cost of this project to be approximately \$300,000 with additional software maintenance fees of approximately \$4,000 annually. Nearly all the costs relate to IT changes to the Company's information systems.

In its Final Order, the Commission recommended a user-fee structure with the goal of limiting cost recovery from EGSs to just those EGSs who actually used the account-look-up system. PECO is greatly concerned with such an approach in that there are no assurances of cost recovery under such a mechanism. As a threshold matter, there is no historical data upon which to analyze a user fee for any system change, thereby providing no guarantee that PECO will fully recover its implementation costs. Moreover, supplier interest in the customer account number lookup tool has not been overwhelming. Indeed, the genesis of this supplier tool stemmed from

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<sup>15</sup> *Id.* at 1 and 11.

a request by one EGS. As a result, there is a significant business risk that PECO will not be able to recover its costs from limited users or that EGSs may avoid the account-lookup tool because of the user fee. To offset the risk of low participation in a user-fee recovery methodology, PECO would have to set a very high user fee. A high user fee, in turn, would further discourage participation in the program. Additionally, the user fee would require administrative tracking, invoicing and payment support, which will increase the personnel requirements and costs (including the user fee) of the program.

Consistent with its recovery of other market enhancement costs arising out of the Commission's Retail Market Investigation and the Commission's Final Order in PECO's second DSP case,<sup>16</sup> PECO is proposing to recover 50% of its costs through a Purchase of Receivables ("POR") discount and 50% through the Generation Supply Adjustment ("GSA"). In order to achieve this cost recovery, PECO will make adjustments to its GSA tariff rate to include 50% of the total costs amortized over a one-year period with the remaining 50% of project costs recovered through the POR discount. Upon Commission approval of this Compliance Plan, PECO will file modifications to its supplier tariff to adjust the POR discount, as necessary, and begin to flow project cost through its GSA mechanism.

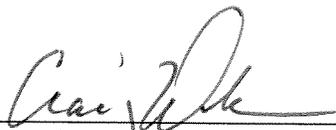
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<sup>16</sup> *Order: Petition of PECO Energy Company for Approval of its Default Service Program II*, Docket No. P-2012-2283641 (February 14, 2013), at 13.

**V. CONCLUSION**

PECO respectfully requests that the Commission approve this Compliance Filing Regarding Customer Account Number Access For EGSs, including the mechanism for cost recovery.

Respectfully submitted,



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