



December 31, 2013

***VIA HAND DELIVERY***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Final Order of the Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service - Docket No. I-2011-2237952**

Dear Secretary Chiavetta:

Enclosed for filing is PPL Electric Utilities Corporation's Compliance Filing Plan for Implementing Seamless Moves and Instant Connects for the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul E. Russell". The signature is fluid and cursive, written over the typed name.

Paul E. Russell

PER/jl  
Enclosures

cc: Kirk House, Office of Competitive Markets Oversight  
Certificate of Service

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Final Order of the Investigation of :  
Pennsylvania's Retail Electricity : Docket No. I-2011-2237952  
Market: End State of Default Service :

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**PPL ELECTRIC UTILITIES CORPORATION  
COMPLIANCE FILING  
PLAN FOR IMPLEMENTING SEAMLESS MOVES AND INSTANT CONNECTS**

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**I. INTRODUCTION**

On February 15, 2013, the Pennsylvania Public Utility Commission ("Commission") entered its Opinion and Final Order, *Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service*, at Docket No I-2011-2237952 ("*RMI Final Order*"). Pursuant to the *RMI Final Order*, the Commission directed Electric Distribution Companies ("EDCs") to develop and submit plans by the end of 2013 to implement Seamless Moves and Instant Connects by June 1, 2015. EDCs were directed to utilize existing supplier consultation processes in developing their plans. Finally, the Commission directed that the plans include the EDC's expected costs and its proposed mechanism for recovering those costs. PPL Electric Utilities Corporation ("PPL Electric" or the "Company") hereby submits its plan, as described in more detail below.

## II. IMPLEMENTATION PLAN

### A. GENERAL PROVISIONS

#### 1. Definitions

In addition to terms defined elsewhere in this document, the following terms used in this Compliance Filing are defined as follows:

(i) "5-Day Confirmation Period" is the 5 calendar day period commencing upon enrollment of a customer by an EGS, which allows a customer to return to default supply prior to receiving generation supply from the EGS, without being subject to potential cancellation fees.

(ii) "11-Day Rule" is the 11 calendar day period immediately following the Company's receipt of an EDI 814 enrollment transaction. An EDC must be informed of a customer's supplier selection at least 11-days prior to the customer's next meter read for the switch to occur at the next meter read. If the EDC does not receive at least 11-days' notice, the supplier switch must wait until the following meter read. This period accommodates the State-wide 5-day customer confirmation period, and the Company's energy and capacity scheduling requirements at PJM.

(iii) "CAP customer" is a customer currently enrolled in PPL Electric's *Customer Assistance Program*.

(iv) "EDEWG" or "Electronic Data Exchange Working Group" is the Commission's EDI Standards group.

(v) "EDI" or "Electronic Data Interchange" is a standardized format for the electronic transfer of data among entities.

(vi) "EGS" or "Supplier" is a retail electric generation supplier.

(vii) "Instant Connect" is the ability of supply service to start on 'Day 1' of new utility service – without the customer first having to go on default service.

(viii) "PLC" or "Peak Load Contribution" is an estimate of the load contribution of a retail or wholesale customer to the summer peak of the EDC, which is used to develop the capacity obligation of the host EDC.

(ix) "Seamless Move" is the ability for a customer to move to a new address without interruption in the service provided by the customer's EGS.

## **2. Supplier Consultation Process**

Pursuant to the *RMI Final Order*, PPL Electric used the existing EGS consultative process to develop its Compliance Plan. Specifically, PPL Electric participated in bi-weekly discussions with PECO Company, Duquesne Light Company, the First Energy Companies (Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company) and Pike County. Additionally, PPL Electric was an active participant in the Pennsylvania Supplier Workshop to discuss Seamless Move and Instant Connect hosted by the First Energy Companies on September 17, 2013. Following this workshop, EDCs invited the supplier community to participate in accelerated weekly discussions hosted by EDCs to help clarify EDC and EGS needs for providing Seamless Move and Instant Connect functionality. The following suppliers/service providers participated in these discussions: Constellation New Energy, Dominion, First Energy Solutions, GDF Suez, Intelometry Inc., ISTA North America, Liberty Power Holdings, PPL Solutions, UGI Energy Services and Tri-Eagle Energy. Commission staff also participated in these discussions.

### **3. Information and Schedule**

PPL Electric will post information regarding Seamless Move and Instant Connect procedures on its General Supplier Information webpage of PPL Electric's website. (<https://www.pplelectric.com/at-your-service/for-generation-suppliers/general-supplier-reference-information.aspx>). This website will serve as the main source of information for PPL Electric's implementation of Seamless Move and Instant Connect functionality.

Seamless Moves and Instant Connects will be offered by PPL Electric to all eligible residential customers and small commercial and industrial ("Small C&I") customers under 25kW starting on June 1, 2015. Implementation by that date will require PPL Electric to modify both its billing and EDI systems and to educate its employees on the details of both new programs. As addressed below, PPL Electric requests Commission approval of these plans for implementing Seamless Move and Instant Connect no later than May 31, 2014.

#### **B. SEAMLESS MOVE (PARAMETERS/ASSUMPTIONS)**

Below are the eligibility requirements for and process details related to customer participation in the Seamless Move process:

##### **1. Eligibility Requirements**

- Customers shopping with an EGS that move within the PPL Electric service territory, including CAP customers.
- Customers that request, in the same phone call, to disconnect at one premise and to connect at a different premises.
- Customers establishing a new account/location must be the same rate class (Residential/Small C&I) as the previous account/location.
- Customers with a move date that has not already occurred.

- Landlord Accounts are not eligible if they are not the contracted party with the Supplier. When a shopping tenant moves from a premise, his or her Supplier selection would not be assigned to the Landlord.

## **2. Process Details**

- PPL Electric will not ask if the customer wants to keep his or her EGS; the Company will automatically process the Seamless Move transaction for shopping customers.
- PPL Electric will transfer summary data or interval data indicator on a customer's old account to a new account:
  - Account retains same bill option, which includes: (1) utility consolidated billing (bill ready or rate ready); or (2) dual bill, where the EDC and the EGS issue separate bills to the customer.
  - Account retains same EGS rate code, which reflects the customer contractual pricing, when the rate ready utility consolidated billing option is in use.
  - Account retains same tax exemption percentage.
- No customer rescission is applicable on a move. The customer's 5-Day Confirmation Period occurred at the time of the contract at the original premise. Therefore, there is no additional confirmation period at new premise.
- Because the EGS for the new location is not changing, PPL Electric will not send a notification letter for Seamless Move transactions.

### 3. Rate Eligibility Requirements

Below are the rate eligibility requirements for customer participation in the Seamless Move process:

- Seamless Move will be offered only to Residential and Small C&I customers (less than 25kW). Large commercial and industrial ("Large C&I") accounts will be managed by Key Account Managers on a case-by-case basis. Large C&I customers do not typically move to a similarly sized location.
- The following chart lists eligible Seamless Move customer rate schedules:

Customer Group	Rate Schedule	Description
Residential	RS	RS – Residential Service
	RTS	RTS(R) – Residential Service – Thermal Storage
Small C&I	GS-1	GS-1 – Small General Service
	GS-3	GS-3 – Large General Service – Customers with less than 500 kW peak demand
	GH-2	GH-2(R) – Separate Meter General Space Heating Service

### 4. PPL Electric Requirements

Below are PPL Electric's requirements relative to the Seamless Move process:

- New, utility-initiated EDI 814 Move transaction will be implemented in accordance with EDEWG approved 814 Move Implementation Guidelines which will include an anticipated start date and new premise demographics, such as address, bill cycle, meter information, PLC tags, etc.

- If an account does not become active at the new location due to obligations not being met, such as security deposits or proof of identification:
  - PPL Electric will void the new account and send an EDI 814 Drop transaction to the Supplier. This process will utilize the same logic as if an account were closed.
- PPL Electric will send an EDI 814 Change transaction with the updated start date if the anticipated connect date previously communicated on the EDI 814 Move transaction has changed.
- Once an EGS relationship is established with a pending active account, all EDI 814 Change transactions that a Supplier would typically receive for an active account will be sent by PPL Electric.

#### **5. EGS Responsibilities**

Below are the responsibilities of EGSs relative to the Seamless Move process:

- Contract portability is assumed. The business model requires that the contract remains with the customer despite the move.
- EGSs will draft new contract language surrounding a move transaction that includes the contract portability clause.
- EGSs cannot reject a Seamless Move transaction. Therefore, no response to the EDI 814 Move transaction will be required.
- If an EGS does not want to maintain the contract with the moving customer, it will need to submit an 814 EDI Drop transaction. The effective/drop dates will be based on the existing 11-Day Rule. All existing consumer notification regulations are applicable.

### **C. INSTANT CONNECTS (PARAMETERS/ASSUMPTIONS)**

PPL Electric plans to implement the necessary Customer Service System and billing changes to enable new default service customers to shop on Day 1, subject to the 11-Day Rule. Currently a new connect customer is automatically placed on default service until the time the customer would choose to shop with an EGS subject to the 11-Day Rule. Under PPL Electric's proposed Instant Connect process, if a customer's connect date would be less than 11 days prior to his or her next meter read date, the customer would be placed on default service. However, the customer would be placed on default service only until his or her next meter read date, at which time the customer would be automatically enrolled with the EGS selected on Day 1 of service. Customers benefit from having to take no further action in selecting an EGS, and EGSs benefit from having the customer enrolled on the earliest possible start date of a new connect, given consideration of the Company's energy and capacity scheduling requirements at PJM.

#### **1. Eligibility Requirements**

Below are the eligibility requirements for and process details related to customer participation in the Instant Connect process:

- New, non-shopping customers moving into a new premise in PPL Electric's service territory, with a desire to shop on Day 1 of service will be eligible for Instant Connect.
- The customer must have a valid account number to provide to his or her intended Supplier in order for the Supplier to send in an EDI 814 Enrollment transaction.

- No Instant Connect is available when the connect date has already occurred. This is referred to as a backdated connect.
- *Landlord Accounts are not applicable. The tenant would be eligible to shop on Day 1.*

## **2. Process Details**

- If the customer provides, at a minimum, 11-days' notice of scheduled move, the customer will start purchasing supply from the EGS on Day 1. If the customer provides less than 11-days' notice, the customer will begin purchasing supply from the EGS on the next scheduled meter read date for the premise, following the processing of the EDI 814 Enrollment by PPL Electric. In either case, the customer's shopping selection will be honored at the earliest possible date, without further action required by the customer.
- The 11-Day Rule requires the enrollment to be received through an EDI transaction by 1:00 p.m., 11 days prior to the meter read date. This date is determined by counting 11 days back starting with the day prior to the meter read date. *For example, if the meter read date is April 20<sup>th</sup>, start counting with April 19<sup>th</sup> as Day 1. In this case, the customer must be enrolled with PPL Electric by 1:00 p.m. on April 9<sup>th</sup>. If Day 11 is a weekend (Saturday or Sunday) or a Holiday, the customer must be enrolled with PPL Electric on the prior business day.*
- There will be a confirmation letter sent by PPL Electric for the Instant Connect EDI 814 Enrollment transaction consistent with existing shopping procedures.

### 3. Rate Eligibility Requirements

Below are the rate eligibility requirements for customer participation in the Instant Connect process:

- Instant Connect will be offered only to Residential and Small C&I customers (less than 25kW). Large C&I accounts will need to be managed by Key Account Managers on a case-by-case basis.
- The following chart lists eligible Instant Connect customer rate schedules:

Customer Group	Rate Schedule	Description
<b>Residential</b>	RS	RS – Residential Service
	RTS	RTS(R) – Residential Service – Thermal Storage
<b>Small Commercial &amp; Industrial</b>	GS-1	GS-1 – Small General Service
	GS-3	GS-3 – Large General Service – Customers with less than 500 kW peak demand
	GH-2	GH-2(R) – Separate Meter General Space Heating Service
	BL	BL – Borderline Service – Electric Utilities
	SA	SA – Private Area Lighting
	SM	SM(R) – Mercury Vapor Street Lighting
	SHS	SHS – High Pressure Sodium Street Lighting
	SE	SE – Energy Only Street Lighting Service
	TS	TS(R) – Municipal Traffic Signal Lighting Service
	SI-1	SI-1(R) – Municipal Street Lighting
	Standby	Rule 6A – Standby Service for Qualifying Facilities applicable to customers in the above listed rate schedules.

#### **4. PPL Electric Requirements**

Below are PPL Electric's requirements relative to the Instant Connect process:

- PPL Electric will send out an EDI 814 Enrollment response the next business day after the EDI 814 Enrollment transaction is received from the EGS.
- If the account is not active when the EDI 814 Enrollment transaction is processed, the transaction is not rejected by PPL Electric. Instead, PPL Electric will send an EDI 814 Enrollment response transaction to the EGS with the anticipated connect date.
- If an account does not become active at the new location due to obligations *not being met, such as security deposits or proof of identification*:
  - PPL Electric will void the new account, and an EDI 814 Drop transaction will be sent to the Supplier. This process will utilize the same logic as if an account was closed.
- PPL Electric will send an EDI 814 Change transaction with the updated start date if the anticipated connect date previously communicated on the EDI 814 Enrollment response transaction has changed.
- Once an EGS relationship is established with a pending active account, all EDI 814 Change transactions that an EGS would typically receive for an active account will be sent by PPL Electric.
- PPL Electric will begin scheduling for the load, based upon the anticipated connect date.

#### **5. EGS Responsibilities**

Below are the responsibilities of EGSs relative to the Instant Connect process:

- EGS must send an EDI 814 Enrollment transaction to PPL Electric consistent with enrollment current practice.
- EGS must solicit the customer for demographic information on the new premises.
- EGS must send the customer a letter within three business days after receipt of the EDI 814 Enrollment response detailing the terms and conditions of its program. Additionally, the EGS is obligated to comply with all rules and regulations set forth in 52 PA Code Chapter 54.

### III. TIMELINE

In order to meet the timeline required by the *RMI Final Order* for implementation on or before June 1, 2015, PPL Electric must modify both its billing and EDI systems. In addition, the Company must educate its employees, particularly its Customer Service Representatives, on the details of both new programs. Accordingly, in order to have sufficient time to undertake these initiatives and meet the timeline provided in the *RMI Final Order* for implementation on or before June 1, 2015, PPL Electric requests Commission approval of these plans for implementing Seamless Move and Instant connect by no later than May 31, 2014.

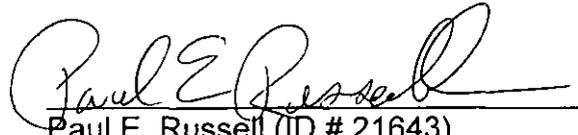
### IV. COST RECOVERY

PPL Electric estimates capital costs associated with implementing Seamless Move and Instant Connect to be approximately \$665,000, which includes modifications to the Company's billing and EDI systems. Additionally, PPL Electric estimates ongoing expenses associated with the need for additional Customer Service Representative time to administer the Seamless Move and Instant Connect transactions. PPL Electric proposes to seek recovery of these costs in its next distribution base rate case filing.

V. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation requests that the Pennsylvania Public Utility Commission issue an Order accepting the Company's plan for Seamless Moves and Instant Connects, as set forth herein.

Respectfully submitted,



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PPL Services Corporation  
Office of General Counsel  
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Date: December 31, 2013

Attorney for PPL Electric Utilities Corporation

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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

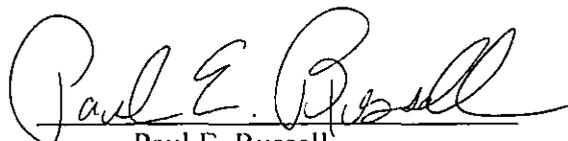
### VIA FIRST CLASS MAIL

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Date: December 31, 2013

  
Paul E. Russell

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