



COMMONWEALTH OF PENNSYLVANIA

March 6, 2014

E-FILED

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

**Re: Investigation of Pennsylvania's Retail Electricity Market: Joint Electric
Distribution Company - Electric Generation Supplier Bill
Docket No. M-2014-2401345**

Dear Secretary Chiavetta:

I am delivering for filing today the Comments, on behalf of the Office of Small Business Advocate, in the above-captioned matter.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Steven C. Gray". The signature is stylized and cursive.

Steven C. Gray
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation of Pennsylvania's Retail :
Electricity Market: Joint Electric Distribution : **Docket No. M-2014-2401345**
Company – Electric Generation Supplier Bill :

**INITIAL COMMENTS OF THE
OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) submits these comments in response to the Pennsylvania Public Utility Commission’s (“Commission”) February 6, 2014, Tentative Order at the docket set forth above.

The Tentative Order includes recommendations to include the electric generation supplier’s (“EGS”) logo on the bill; the expansion of bill messaging space allotted to EGSs; and the inclusion of a “Shopping Information Box.” The OSBA has discussed these recommendations both internally and with this office’s witnesses, Brian Kalcic and Robert D. Knecht.

1. Inclusion of an EGS's Logo on Utility-Consolidated Bill

Based upon the Tentative Order, the EDCs do not appear to have any technical problem(s) with this recommendation. Therefore, the issue is cost. The OSBA observes that there is a distinguishable difference between marketing and non-marketing costs (e.g., education). Marketing costs are common to any type of business endeavor, and are one of many categories of expense that equate to “the cost of doing business.” As such, there is no reason why ratepayers should pay EGS marketing costs. Including EGS logos on bills clearly falls in the marketing category. Therefore, EGSs should pay 100% of the costs for the inclusion of the logo.

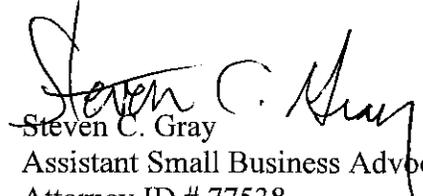
2. Expansion of EGS Bill Messaging Spacing

The Tentative Order makes clear that this recommendation pertains to allocating an EGS more space on an existing bill without adding to the number of pages (or costs associated with preparing/ mailing a bill). Achieving “uniformity” in the amount of space presently allocated to EGSs across EDCs’ bills seems to be a technical issue that is best left to the EDCs for comment.

3. **Inclusion of a Shopping Information Box**

This recommendation concerns the “placement and presentation” of information that a customer needs when contacting an EGS. Since the purpose of the information box is to facilitate shopping, the Shopping Information Box should also include the customer's price to compare (“PT”C) to facilitate evaluation of EGS offers. Including the PTC in the proposed Shopping Information Box makes more sense than burying that information somewhere else on the bill.

Sincerely,


Steven C. Gray
Assistant Small Business Advocate
Attorney ID # 77538

For:

John R. Evans
Small Business Advocate

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Dated: March 6, 2014