

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COMMENTS OF
CONSTELLATION NEWENERGY, INC.**

I. INTRODUCTION

On February 6, 2014, the Pennsylvania Public Utility Commission (“Commission”) issued a Tentative Order¹ in which it supported the Commission’s Office of Competitive Market Oversight’s (“OCMO”) recommendations “for making a more supplier-oriented utility consolidated electric bill.”² Specifically, the Commission supported inclusion of an electric generation supplier’s (“EGS”) logo on the bill, expansion of bill messaging space allotted to EGSs, and inclusion of a Shopping Information Box. In addition, the Commission sought further comments regarding EGS bill inserts for utility consolidated electric bills.

Constellation NewEnergy, Inc. (“Constellation”) appreciates the opportunity to provide these brief comments in support of the Commission’s Tentative Order. With continuing work of the Commission and stakeholders, Constellation looks forward to a competitive retail electric market where customers are provided more thorough and better-tailored information regarding their competitive EGS supply service. The proposals supported by the Commission in

¹ *Tentative Order in re: Investigation of Pennsylvania’s Retail Electricity Market: Joint Electric Distribution Company – Electric Generation Supplier Bill*, Commission Docket No. M-2014-2401345 (issued Feb. 6, 2014) (“Tentative Order”).

² Tentative Order at p.1.

the Tentative Order represent another important step, and further evidence the Commission's support for a more robust retail electricity market.

II. BACKGROUND ON CONSTELLATION

Constellation is an indirect, wholly-owned subsidiary of Exelon Corporation, a North American energy company headquartered at 10 South Dearborn Street, Chicago, Illinois, with operations and business activities in 47 states, the District of Columbia and Canada. Exelon owns Commonwealth Edison Company ("CornEd"), Baltimore Gas and Electric Company ("BGE") and PECO Energy Company ("PECO"), as well as several merchant subsidiaries in addition to Constellation. Constellation is a licensed EGS in the Commonwealth, pursuant to 66 Pa.C.S. § 2809.

III. CONSTELLATION'S COMMENTS

Constellation commends the Commission for issuing this Tentative Order as part of its ongoing investigation into the retail electric market. A fundamental challenge to EGSs is the fact that often the only regular communication that customers receive related to their electric or gas service comes from the legacy utility, as was the case prior to the implementation of customer choice. Constellation supports the three recommendations identified above in order to improve customers' experiences with and services from EGSs through utility-consolidated billing.

Allowing an EGS's logo to appear on the utility-consolidated bill will promote stronger relationships between EGSs and their customers, and will help to better identify and remind customers of the important choice they made in shopping for competitive electric supply. Moreover, allowing for additional bill messaging space reserved for EGSs on utility-consolidated

bills will provide to EGSs an additional, significant means of communicating with their customers – e.g., by allowing for better product descriptions, and/or by providing a space to highlight important information to customers. Furthermore, the ability of an EGS to periodically augment its customer communication with an informational or product-related insert will further enhance EGSs’ ability to develop ongoing relationships with their customers. Finally, the proposal for a more universally applied and consistent “Shopping Information Box” will better empower customers to be ready and able to shop for competitive supply, and will serve to highlight, once more, the ability for customers to make choices regarding their energy needs.

In addition to the above, Constellation recommends that the Commission work to develop a plan to transition to *supplier*-consolidated billing. Utility consolidated billing is critical to success in the short term as it removes a substantial barrier to entry for marketers. However, as the market matures, migration to supplier-consolidated billing should be a priority as it is necessary for EGSs to be able to offer more complex/innovative products currently constrained by the limitations of utility-consolidated billing.

IV. CONCLUSION

Constellation appreciates this opportunity to submit to the Commission its Comments on the Tentative Order. The proposals for improvements to utility-consolidated bills therein will promote continued development of the Commonwealth’s competitive retail markets, for the ultimate benefit of Pennsylvania’s consumers. Constellation looks forward to continued discussions with all stakeholders during this Investigation regarding the issues addressed

herein, and other issues pertaining to the development of the competitive electricity markets throughout the Commonwealth.

Respectfully submitted,



Asst. General Counsel
Exelon Business Services Corp.
100 Constellation Way, Suite 500C
Baltimore, MD 21202
Telephone: (410) 470-3158
divesh.gupta@constellation.com

On Behalf of Constellation NewEnergy, Inc.

DATED: March 10, 2014