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March 10, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

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

Dear Secretary Chiavetta:

Enclosed please find the Comments of Citizens' Electric Company of Lewisburg, PA and
Wellsboro Electric Company regarding the above-referenced proceeding.

Very truly yours,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink, appearing to read 'Pamela C. Polacek', is written over the printed name.

Pamela C. Polacek

Counsel to Citizens' Electric Company of Lewisburg, PA
and Wellsboro Electric Company

PCP/sar
Enclosure

c: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

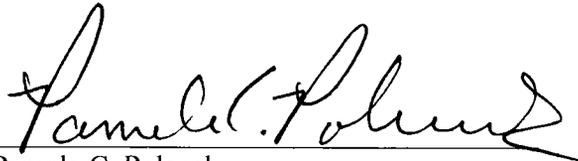
VIA FIRST CLASS MAIL

John R. Evans, Esquire
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Tanya McCloskey, Esquire
Aron J. Beatty, Esquire
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Pamela C. Polacek

Counsel to Citizens' Electric Company of
Lewisburg, PA and Wellsboro Electric Company

Dated this 10th day of March, 2014, at Harrisburg, Pennsylvania.

to implement Electronic Data Interchange ("EDI"). The implementation of EDI will greatly enhance the ability of EGSs to enter the Companies' service territories. Citizens' and Wellsboro anticipate that their EDI systems will be fully functional during the 2nd Quarter of 2015, which corresponds with the beginning of their next Joint Default Service Plan.

The Companies believe that the billing format changes outlined in the Tentative Order can be implemented within 4-5 months after a final determination is made; however, if the implementation activities for the Tentative Order conflict with activities under the EDI implementation schedule, Citizens' and Wellsboro respectfully suggest that the EDI project should take precedence, because it will have a greater impact on the ability of consumers in their territories to shop for competitive supply alternatives.

The Companies' billing vender indicated that the initial modifications to the bill format to include space for an EGS logo, the Shopping Information Box and the expanded EGS message space will be approximately \$7,500 - \$10,000 for each company.¹ The vender has indicated that minimal additional work will be required to add each individual logo.

Furthermore, the Companies urge the Commission to allow flexibility to depart from the recommendations for specialized billing situations. For example, a virtual net metering customer may have multiple accounts on a single bill. The EDC should have the flexibility to eliminate the Shopping Information Box, logo or EGS message space on specialized bills.

The Commission's Tentative Order suggests that the costs of the modifications should be recovered from all customers on a non-bypassable basis through the EDC's Retail Market

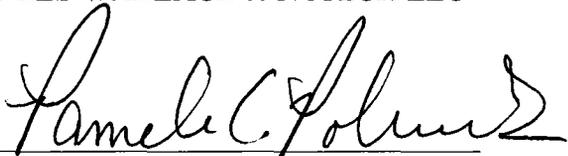
¹ The quotations obtained by Citizens' and Wellsboro assumed that the customer will be served by a single EGS for each billing period. The Companies are very concerned with the possible increased costs and bill complexity that could occur if a customer is permitted to have two suppliers or more (whether 2 EGSs or an EGS and Default Service) in a single billing period. In other words, a regulatory or legislative mandate that the Companies accommodate mid-cycle switching will increase the cost and the complexity of the bill modifications contained in the Tentative Order. Expanding the mandate beyond a single mid-cycle switch will further complicate implementation of the Tentative Order.

Enhancement surcharge or a similar mechanism. The Companies question whether all (or a portion) of the logo costs should be paid by the EGS requesting to include the logos on the bills. For the remainder of the costs, the Companies anticipate submitting a proposal later this year to implement a non-bypassable surcharge to recover retail market enhancement costs (e.g., the EDI project costs, the billing system costs to comply with this Tentative Order, etc.), and other appropriate costs.

WHEREFORE, Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company respectfully request that the Pennsylvania Public Utility Commission consider and adopt, as appropriate, the foregoing Comments.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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