



Exelon Business Services Company  
Legal Department  
2301 Market Street / S23-1  
P. O. Box 8699  
Philadelphia, PA 19101-8699

Direct Dial: 215.841. 5974  
Email: [Craig.Williams@exeloncorp.com](mailto:Craig.Williams@exeloncorp.com)

March 11, 2014

**VIA eFILING**

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

**Re: Joint Electric Distribution Company –  
Electric Generation Supplier Bill  
Docket No. M-2014-2401345**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter are the **Comments of PECO Energy Company to the Tentative Order Entered on February 6, 2014**. This is a re-filing with the correct docket number on the certificate of service.

Sincerely,

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

W. Craig Williams

Enclosures

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**COMMENTS OF  
PECO ENERGY COMPANY  
TO THE TENTATIVE ORDER  
ENTERED ON FEBRUARY 6, 2014**

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**I. INTRODUCTION**

On April 29, 2011, the Public Utility Commission (“PUC” or “Commission”) initiated an investigation into Pennsylvania’s retail electricity market.<sup>1</sup> The Order of April 29, 2011 tasked the Commission’s Office of Competitive Market Oversight (“OCMO”) – with input from stakeholders – to study how to address issues identified by the Commission for improving the retail electricity market.

After stakeholder technical conferences, *en banc* hearings and receiving comments on a Tentative Order, the Commission issued the End State Final Order regarding the competitive retail market and default service.<sup>2</sup> The Commission directed that, among other things, by the end of 2013, OCMO should provide recommendations on how the current utility-consolidated bill might be more supplier-oriented.<sup>3</sup> Those recommendations were to include, but were not limited to, the following: making the electric generation supplier’s (“EGS”) information more

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<sup>1</sup> See *Investigation of Pennsylvania’s Retail Electricity Market*, Docket No. I-2011-2237952 (Order entered April 29, 2011).

<sup>2</sup> See *Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service*, Docket No. I-2011-2237952 (Order entered February 15, 2013) (“End State Final Order”).

<sup>3</sup> *Id.* at 67.

prominent; including the EGS's logo on the electric distribution company ("EDC") bill; providing increased spacing for EGS messaging and potentially allowing EGS bill inserts.

As a result of informal feedback on those issues from OCMO and stakeholders, on February 6, 2014, the Commission issued this Tentative Order, requesting comments on subjects involving joint EDC and EGS billing.<sup>4</sup> Specifically, the Commission requests comments on inclusion of the EGS's logo on the EDC bill; expansion to the bill messaging space provided to the EGSs; inclusion of a Shopping Information Box; inclusion of EGS bill inserts; cost estimates and recovery proposals on the bill-change recommendations; and the implementation deadline of June 1, 2015.

PECO appreciates this opportunity to provide comments on the Tentative Order.

## **II. COMMENTS**

### **A. Inclusion of the EGS Logo**

In the Tentative Order, the Commission recommends placement of the EGS logo on the EDC bill. The Commission stated that inclusion of the logo will make the EGS's information more noticeable and will increase customer awareness of their selected EGS. The Commission also offered that the presence of an EGS logo on the EDC bill will strengthen the relationship between the customer and their selected EGS. Finally, the Commission suggested that the logo might be in black and white or in color.<sup>5</sup>

PECO currently provides EGS information on its bill. However, PECO agrees that the addition of a logo in the billing detail section near the EGS charges (on the second page of the PECO bill) will increase customer awareness of their selected EGS and services.

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<sup>4</sup> *Investigation of Pennsylvania's Retail Market Electricity Market: Joint Electric Distribution-Electric Generation Supplier Bill, Tentative Order*, Docket No. M-2014-2401345 (Order entered February 6, 2014) ("Tentative Order").

<sup>5</sup> *Tentative Order*, at 4.

For its own bill, PECO suggests that suppliers should provide their own high-resolution logos in a specified file format (for example, .pdf or .tiff). Due to the costs associated with a color set up in the middle of black and white bills, PECO recommends integrating a high resolution black and white logo on EDC bills. PECO also proposes that all suppliers be permitted a logo of no larger than 3/8" x 1 7/16" to accommodate the space being set aside for the EGS logo. The maximum logo dimensions would be identical for all suppliers. For quality control purposes regarding the content and presentation of its bill, PECO recommends that it retain discretion to review and approve all logos that would be printed on the bill. If a customer does not have a supplier during the billing period, then no EGS logo would be displayed. (See mockup of proposed bill at Attachment A.)

As part of the initial project build up of placing the EGS logo on the bill, PECO would pay for the initial logo setup. However, if an EGS later wants to change their logo, PECO suggests those costs should be borne by the EGS requesting the change.

PECO recognizes, however, that there will be variation in the ability of each EDC to accommodate EGS logos on their bills. For example, some EDCs have worked to reduce the number of pages in their bills to reduce costs, and strict application of uniform rules across all EDCs may result in non-uniform burdens and costs.<sup>6</sup> PECO, therefore, recommends that EDCs be given some discretion in how best to accommodate the inclusion of EGS logos within the space requirements of the EDC bill.<sup>7</sup> Each EDC should clearly communicate the standards for

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<sup>6</sup> For example, should the Commission decide that the EGS logo should be placed on the bill in a place other than that suggested by PECO, then an additional page of PECO's bill likely will result, which will significantly increase costs.

<sup>7</sup> Not included within the analysis here about EGS logo placement are the implications of mid-cycle switching rules, which are still to be determined. The juxtaposition of those mid-cycle switching rules with the rules about bill presentation could result in several logos being placed on the bill, including from the former supplier and new supplier, and perhaps two more from gas suppliers. Those rules may drive PECO's bills onto additional pages, which again would increase costs substantially.

logo size, quality and placement, consistent with the Commission’s final rules.

**B. Expansion of EGS Bill Messaging Spacing**

In the Tentative Order, the Commission recommends an expansion of EGS bill messaging space from two lines to four lines. However, due to the lack of uniformity in bill-messaging space with the EDCs, the Commission has asked for comments on the amount of space currently available on EDC bills; how much additional space should be provided for future EGS bill messaging; and potential electronic data interchange (“EDI”) changes that may be necessary.<sup>8</sup>

PECO currently provides two lines of EGS messaging space on its bill, with a maximum of 80 characters per line. These messages appear on the first page of the bill in the Message Center section, adjacent to the EGS name, address and contact phone number.

PECO agrees with the recommendation to increase the messaging space from two to four lines. PECO proposes that the expanded EGS messaging be located in the same area currently used for EGS messages, on the front page of the bill adjacent to the supplier contact information.<sup>9</sup> In order to make use of this front-page location for the EGS, PECO needs each line to be limited to no more than 80 characters. If PECO must increase the number of characters per line allocated to EGS messaging, PECO may need to relocate the messaging to a later page of the bill, which may force another page of PECO’s bill.

In order to support the addition of two lines of 80 characters each, PECO will need a formal modification of the current standard for the EDI 810 LDC Consolidated Billing transaction sent to PECO by the EGSs. The current EDI transaction for EGS messaging

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<sup>8</sup> *Tentative Order*, at 5.

<sup>9</sup> As with the EGS logo, if the final rule requires a different placement for the additional EGS messaging, PECO may be required to increase the number of pages for its bill, thereby substantially increasing costs.

specifies a maximum of two lines of text. The EDI modification would permit two additional NTE\*ADD segments of 80 characters each for a total of four segments (which would comprise the four lines of messaging). PECO would then need to modify its IT and interface systems to support receipt of the four NTE\*ADD segments. These changes would provide the EGS up to 320 characters of message space on PECO's bill. PECO would request a change to the EDI transaction and standard through EDEWG.

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

In the Tentative Order, the Commission offers for comment the creation of a conspicuous "Shopping Information Box" that may be placed on the EDC bill. Under the Commission's design, the Shopping Information Box must be conspicuous; must be placed on the bill separate and apart from other charges; and must include necessary information to assist customers when shopping (account or customer number, rate schedule and explanation of the Shopping Information Box). The Commission has asked for comments on the suggested placement and presentation of the Shopping Information Box, including how to treat multiple customer account numbers.<sup>10</sup>

Currently, PECO does not provide information for customers to use when shopping for a supplier beyond the customer's individual Price to Compare. PECO agrees that a conspicuous display on the EDC bill of essential shopping information would be of value to shopping customers, and PECO concurs with inclusion of the Shopping Information Box on the EDC bill. PECO also largely agrees with the format proposed by the Commission in the Tentative Order. However, due to space limitations, PECO recommends an elongated box that fits across the bill page, rather than consuming more lines of bill text, leaving unusable space around the Shopping

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<sup>10</sup> *Tentative Order*, at 7.

Information Box. As for its own bill, PECO proposes to place the Shopping Information Box at the end of the last page of the bill.<sup>11</sup>

PECO anticipates a similar requirement for gas shopping information on its bill, and as a matter of efficiency, suggests a Shopping Information Box design that can accommodate that additional rate information from the start, rather than later redesigning the information box to accommodate further rate information. PECO’s proposal reserves space for two rate schedules in the Shopping Information Box, per the examples below.

Samples of the Shopping Information Box:

**Example #1 = Customers with dual service, electric and gas**

Shopping Information Box	
When shopping for competitive electric/natural gas Supplier, please provide the following:	Account Number: 00000-00000
Electric Rate: Electric Residential Service	Gas Rate: Gas Residential Heating Service

**Example #2 = Customers with electric service only**

Shopping Information Box	
When shopping for competitive electric/natural gas Supplier, please provide the following:	Account Number: 00000-00000
Electric Rate: Electric Residential Service	Gas Rate:

**Example #3 = Customers with gas service only**

Shopping Information Box	
When shopping for competitive electric/natural gas Supplier, please provide the following:	Account Number: 00000-00000
Electric Rate:	Gas Rate: Gas Residential Heating Service

Recognizing that each EDC has space constraints and requirements for its bill, PECO recommends that the Commission issue Shopping Information Box guidance, such as the criteria listed in the Tentative Order, rather than prescribing precisely how the Shopping Information Box must appear on the EDC bill.

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<sup>11</sup> PECO does not bill more than one account on its bill, so the issue of listing multiple accounts of either electric or gas service does not pertain to PECO.

#### **D. Inclusion of EGS Inserts**

In the Tentative Order, the Commission requests comments on the inclusion of EGS bill inserts, which might take the form of a letter, a notice or a marketing material provided by that customer's current EGS. At this time, the Commission is not recommending the inclusion of EGS inserts, noting that due to the lead time needed to prepare the inserts, information from the EGS might be outdated by the time it reaches the customer, and that there is insufficient information to show that the benefits of an EGS insert outweigh the costs and complexities of including the insert.

As a threshold matter, PECO agrees with the Commission's concern that due to the time required for advance planning and preparation, bill inserts from EGSs to their customers may be outdated (and perhaps confusing). PECO maintains a rigorous schedule for the development and production of the company's bill inserts and monthly customer newsletters. PECO typically sends up to five inserts through the bill each month in varying combinations, such as Energy@HOME, Energy@WORK, PECO Smart Ideas (ACT 129-related program marketing inserts), general marketing, gas/electric safety inserts, and mandatory regulatory inserts. The development and production schedule includes copy draft, design, review and printing. PECO currently schedules its bill inserts for the entire calendar year in the last quarter of the prior year. Currently, the weight limit for the bill (including inserts) is 2 ounces, and the equipment is programmed to stop inserting once that weight limit is reached. Consequently, there could be pre-planned inserts that do not make it into the bill, due to weight limits which are driven by postal costs. Due of the great lead time in designing, approving and producing the EGS bill inserts, PECO anticipates that much of the EGS information provided to its customers through a bill insert may be stale.

In addition, PECO agrees with the Commission's concerns that the benefits of an EGS bill insert have not been shown to outweigh the costs and complexities of including the insert. PECO's bill printing vendor currently cannot accommodate bill inserts from all the Pennsylvania EGSs. PECO's vendor has a bill inserter which utilizes six pockets to facilitate the distribution of up to six inserts. To expand the insert capacity and retain the ability to sort customer bills according to the customer's actual supplier, PECO's vendor would need new machinery to commit a bill insert pocket for each supplier. PECO estimates that it would need to purchase more than fifteen pieces of equipment, to be maintained at PECO's expense, for the vendor to complete the task of adding individualized inserts for each EGS. The vendor has confirmed that they cannot accommodate that additional equipment, making the task impossible for them.

Finally, there is great complexity in placing the correct EGS bill insert only in the bill envelope of those EGS customers. This complexity would require substantial IT programming to maintain accurate EGS customer lists in the billing process, and then sort individual EGS inserts to the correct customer. Again, PECO does not currently have this capability.

For these reasons, PECO recommends against including EGS bill inserts in the EDC bill.

#### **E. Costs and Recovery of Costs**

The Tentative Order has three areas of implementation costs: 1) inclusion of a supplier logo on the bill, 2) inclusion of two additional lines of supplier messaging, and 3) inclusion of a Shopping Information Box. The Commission directed the EDCs to include estimated costs for implementation of these three areas of bill modification, as well as proposals for recovery of those costs. PECO currently estimates the implementation costs to be approximately \$770,000

for all three bill changes. The bulk of the costs relate to IT programming for the three bill changes, which cannot be separated without knowing the final design requirements.

PECO supports the Commission's recommendation for full and current cost recovery. The Commission suggests a non-bypassable charge to recover the cost, indicating that all customers will benefit, so all customers should pay the costs. PECO suggests that a 50/50 split between a purchase of receivable ("POR") discount and the Generation Supply Adjustment ("GSA") is more appropriate. As with many retail market enhancements, some of the enhancements benefit EGSs and some benefit all customers, therefore a sharing of the cost recovery avoids the need to evaluate each market-enhancement program, while providing a reasonable allocation of the costs for recovery.

#### **F. Timeline**

Based on PECO's analysis of the implementation schedule, it will take approximately 10 months to fully implement the system changes that will be required to accomplish the bill changes. Based on a 10-month project implementation period and PECO's already-scheduled IT rollouts for 2015, PECO would need Plan approval by the end of the second quarter of 2014 to meet the June 1, 2015 implementation deadline.<sup>12</sup> If final rules on EDC-EGS bill changes come after the second quarter of 2014, PECO may need leave of the Commission to extend the implementation deadline.

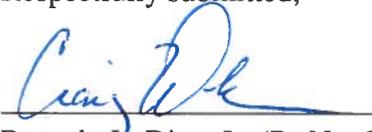
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<sup>12</sup> Note that the 10-month implementation schedule does not include approval of EDI-transaction changes by EDEWG, which is a prerequisite to the EGS messaging change.

### III. CONCLUSION

PECO appreciates the opportunity to provide comments on the joint EDC-EGS bill. PECO agrees that a clear display of account and rate information will benefit shopping customers, and that enhancing the presentation of supplier information by including the EGS logo and additional space for messaging will promote the relationship between EGSs and their customers.

Respectfully submitted,



Romulo L. Diaz, Jr. (Pa No. 88795)  
Anthony E. Gay, Esq. (Pa No. 74624)  
W. Craig Williams, Esq. (Pa No. 305406)  
Exelon Business Services Company  
2301 Market Street  
Philadelphia, PA 19103  
Tel: 215.841.5974  
Email: [craig.williams@exeloncorp.com](mailto:craig.williams@exeloncorp.com)

Date: March 10, 2014

*Counsel for PECO Energy Company*

# Attachment A

Name: MS CUSTOMER
Account Number: 01234-56789
Phone Number: 215-841-4000
Service Address: 2301 MARKET ST, PHILADELPHIA

Billing Summary

Bill Date 02/07/2014
Thank you for your payment of \$139.66

Two Suppliers Bill Account

Current Period Charges

Table with 2 columns: Description (Gas, Electric, Total New Charges, Total Amount Due on 03/03/2014) and Amount (\$31.92, \$113.96, \$145.88, \$145.88)

General Information

Next scheduled meter reading: March 5, 2014
PECO, 2301 Market St, Philadelphia, PA 19103-1380. If you have any questions or concerns, please call 1-800-494-4000 before the due date.

- Customer Self Service - Manage Your Account 24/7
- www.peco.com/ebill - Go paperless: receive and pay your bill
- www.peco.com/service - Start, stop and transfer your service
- www.peco.com/SmartIdeas - Save energy and money
- Pay by phone with credit/debit card at 1-877-432-9384 (\$2.35 fee)

Quest Gas Energy Services, 165 Sunrise Valley Drive, Ste. 001, Herndon, VA 20171, 123-456-7890
Energy One Solutions Corp, 300 White Drive, B5, Akron, OH 44320, 123-456-7890

Message Center

PECO:
New charges contain estimated total state taxes of \$4.21, including \$6.94 for State Gross Receipts Tax.
Your estimated electric price to compare is \$0.0977 per kWh. This may change in March, June, September and December. For more information and supplier offers visit www.PAPowerSwitch.com and www.oca.state.pa.us.
Your estimated gas price to compare for your rate class is \$0.5449 per Ccf. This may change in March, June, September and December. For more information on how to shop for natural gas visit http://www.puc.pa.gov/consumer\_info/natural\_gas/natural\_gas\_shopping/gas\_shopping\_tool.aspx.

From Your Supplier:

Only Display If Supplier Sends Messages

When paying in person, please bring the entire bill. (continued on next page)



Return only this portion with your check made payable to PECO. Please write your account number on your check.

- Check here to enroll in Power Pay automatic account debit and complete form on reverse side.
Check here to pledge a donation to MEAF and complete form on reverse side.

To pay by phone call 1-877-432-9384. A convenience fee will apply.

01234 5678 40000 0000

11938 1 AT 0 403 11938/011938/024119 038 01 GXFQC1 1 02082014
MR CUSTOMER
2301 MARKET ST,
PHILADELPHIA PA 19101-0629

Account Number 01234-56789 Payment Receipt Stamp

Payment Amount box

Please pay this amount by 03/03/2014 \$145.88

00000145880000000000

PECO - PAYMENT PROCESSING
PO BOX 37629
PHILADELPHIA PA 19101-0629

012345678900001458840620145888

Name: MR CUSTOMER  
 Account Number: 01234-56789

Meter Information								
Read Date	Meter Number	Load Type	Reading Type	Meter Reading		Difference	Multiplier X	Usage
				Previous	Present			
02/03	015621489	General Service	Total Ccf	4687 Actual	4707 Actual	20	1	20
02/03	113713268	General Service	Tot kWh	10363 Actual	11159 Actual	796	1	796

Total Ccf Used ..... 20  
 Total kWh Used ..... 796

**Gas Residential Service - Current Period Detail** **Service 01/02/2014 to 02/03/2014 - 32 days**

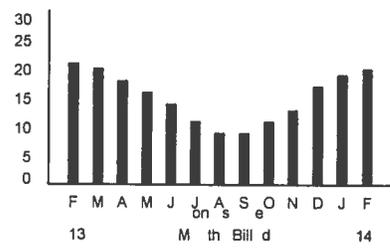
Customer charge				\$11.75
Distribution Charges	20 Ccf	X	\$0.34816	6.96
Balancing Service Charges	20 Ccf	X	0.03309	0.66
State Tax Adjustment				-0.05

Supplier Logo

Quest Gas Energy Services Charges / 123-456-7890  
 Usage 20 Ccf at \$0.63 per Ccf 12.60

**Total Current Charges** **\$31.92**

13-Month Usage (Total Ccf)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	20	0.6	32	29
Last Month	19	0.5	32	39
Last Year	21	0.6	32	36

Avg Ccf per Month	14
Total Annual Ccf Usage	177

**Electric Residential Service - Current Period Detail** **Service 01/02/2014 to 02/03/2014 - 32 days**

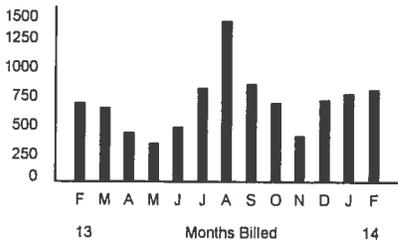
Customer charge				\$7.09
Distribution Charges	796 kWh	X	\$0.05940	47.28
State Tax Adjustment				-0.11

Supplier Logo

Energy One Solutions Corp Charges / 123-456-7890  
 796 KWH TOTAL@ \$0.075/KWH GENERATION 59.70

**Total Current Charges** **\$113.96**

13-Month Usage (Total kWh)



**Your Usage Profile**

Period	Usage	Avg Daily Usage	Days	Avg Daily Temp
Current Month	796	24.8	32	29
Last Month	757	23.6	32	39
Last Year	682	20.6	33	36

Avg kWh per Month	686
Total Annual kWh Usage	8,232

**Shopping Information Box**

When shopping for a competitive electric/natural gas supplier, please provide the following: Account Number: 00000-00000  
 Electric Rate: Electric Residential Service Gas Rate: Gas Residential Service

DO NOT MAIL THIS PORTION WITH YOUR PAYMENT

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**INVESTIGATION OF** :  
**PENNSYLVANIA'S RETAIL** :  
**ELECTRICITY MARKET:** : **DOCKET NO. M-2014-2401345**  
**JOINT ELECTRIC DISTRIBUTION** :  
**COMPANY – ELETRIC GENERATION** :  
**SUPPLIER BILL** :

**CERTIFICATION OF SERVICE**

I hereby certify and affirm that, on March 10, 2014, I have served a copy of PECO Energy Company's Comments to the Tentative Order Entered on February 6, 2014 on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA E-FILING**

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

**VIA FIRST CLASS MAIL**

Abraham Silverman  
NRG Energy Inc.  
211 Carnegie Center  
Princeton, NJ 08540

Tanya J. McCloskey, Acting Consumer  
Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor Forum Place  
Harrisburg, PA 17101-1923

Honorable Camille George  
Pennsylvania House of Representatives  
38 B East Wing  
Harrisburg, PA 17120-2020

Pamela C. Polacek, Esq.  
McNees Wallace & Nurick  
Citizen's Electric Company of Lewisburg PA  
and Wellsboro Electric Co.  
100 Pine Street  
PO Box 1166

Terrance J. Fitzpatrick, President and CEO  
Energy Association of Pennsylvania  
800 N. 3rd Street, Suite 205  
Harrisburg, PA 17102

Edward V. Johnstonbaugh, Administrator  
Future Times Energy Aggregation Group  
474 Justabout Road  
Venetia, PA 15367

Frank Caliva, III, Consultant  
Strategic Communications LLC  
Pennsylvania Energy Marketers Coalition  
3532 James Street, Suite 106  
Syracuse, NY 13206

Joel Malina, Executive Director  
Compete Coalition  
1317 F Street NW, Suite 800  
Washington DC 20004

Theodore S. Robinson, Esq.  
Citizen Power  
2121 Murray Avenue  
Pittsburgh, PA 15217

Michael Meath, President  
Strategic Communications, LLC  
Pa Energy Marketers Coalition  
3532 James Street, suite 106  
Syracuse, NY 13206

Madelon Kuchera, Esq.  
BlueStar Energy Services  
363 West Erie Street, 7th Floor  
Chicago, IL 60654

Todd S. Stewart, Esq.  
Hawke McKeon and Sniscak LLP  
Dominion Retail & Interstate Gas Supply  
100 North Tenth Street  
Harrisburg, PA 17101

John J. Gallagher, Esq.  
Pike County Light and Power  
711 Forrest Rd.  
Harrisburg, PA 17112

Deanne M. O'Dell, Esq.  
Eckert Seamans Cherin & Mellott LLC  
Retail Energy Supply Association  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17108-1166

PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101-1414

Richard Hudson  
Director of Regulatory Affairs  
Consolidated Edison  
1102 Park Square  
Munhall PA 15120

Daniel Clearfield, Esq.  
Eckert Seamans Cherin & Mellott LLC  
Direct Energy Services  
213 Market Street, 8th Floor  
Harrisburg, PA 17101

Dr. Andrew Klier  
Professor, Earth & Mineral Engineering  
Penn State University  
213 Hosler Building  
University Park, PA 16802

Tim Locascio, Manager  
Liberty Power Corp.  
1970 West Cypress Creek Road, Suite 600  
Fort Lauderdale, FL 33309

Elizabeth R. Marx, Esq.  
Pa. Coalition Against Domestic Violence  
3605 Vartan Way  
Harrisburg, Pa 17110

Sam Denisco  
VP of Government Affairs  
Pennsylvania Chamber of Business and  
Industry  
417 Walnut Street  
Harrisburg, PA 17101-1902

Katie Bolcar  
The Solar Alliance  
PO Box 392  
Linthicum, MD 21090

Honorable Barry Smitherman, Chairman  
Public Utility Commission of Texas  
1701 N. congress Avenue  
Austin, TX 78711-3326

Scott J. Schwarz, Esq.  
City of Philadelphia  
1515 Arch Street, 16th Floor  
Philadelphia, PA 19102-1595

Chris Hendrix  
Director Regulatory Compliance  
Texas Retail Energy  
2001 S. E. 10th Street  
Bentonville, AR 72716

Harry Kingerski  
Director of Regulatory Affairs  
Spark Energy, LP  
2105 City West, Suite 100  
Houston, TX 77042

Jay Kooper  
Director of Regulatory Affairs  
Hess Corporation  
One Hess Plaza  
Woodbridge, NJ 07095

The Honorable Phyllis Mundy  
State Rep  
120<sup>th</sup> Legislative District  
36 East Wing  
P.O. Box 202120  
Harrisburg, PA 17120-2120

Paul E. Russell, Esq.  
PPL Electric Utilities Corporation  
2 North Ninth Street  
Allentown, PA 18101

Frederick J. Eichenmiller, Esq.  
Duquesne Light  
411 Seventh Avenue, 8<sup>th</sup> Floor  
Mail Drop 8-5  
Pittsburgh, PA 15219

Thu B. Tran, Esq.  
Community Legal Services Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102

David S. Cohen, President  
Rescom Energy LLC  
20 East Avenue  
Bridgeport, CT 06610

William R. Lloyd, Jr.  
Office of Small Business Advocate  
Steven C. Gray, Esq.  
Suite 1102  
Commerce Building  
300 N. Second Street  
Harrisburg, PA 17101

Jacob G. Smeltz, Vice President  
Electric Power Generation Association  
800 North Third Street, Suite 303  
Harrisburg, PA 17102

Ray Landis  
Director Government Affairs  
AARP  
30 N 3<sup>rd</sup> Street, Suite 750  
Harrisburg, PA 17101

Aron J. Beatty, Esq.  
Office of Consumer Advocate  
5<sup>th</sup> Floor Forum Place  
555 Walnut Street  
Harrisburg, PA 17101-1923

Melanie J. Elatieh, Esq.  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406

Deanne M. O'Dell, Esq.  
Eckert Seamans Cherin & Mellott LLC  
Stream Energy Pa  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

David Fein, Vice President  
Constellation Energy Group Inc.  
Constellation NewEnergy Inc & Constellation  
Energy Commodities Group Inc.  
10 South Dearborn Street, 47<sup>th</sup> Floor  
Chicago, IL 60603

Brian J. Knipe, Esq.  
Buchanan Ingersoll & Rooney PC  
76 South Main  
Akron, OH 44308

Courtney Lane  
Citizens for Pennsylvania's Future PennFuture  
1500 Walnut Street, Suite 502  
Philadelphia, PA 19102

Michael A. Gruin, Esq.  
Stevens & Lee  
Washington Gas Energy Services Inc.  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101

Robert M. Strickler, Esq.  
Griffith Strickler Lerman Solymos & Calkin  
York County Solid Waste & Refuse Authority  
110 South Northern Way  
York, PA 17402-3737

Robert H. Hoaglund, III  
Assistant General Counsel  
Duquesne Light Company  
411 Seventh Avenue, 16<sup>th</sup> Floor 16-1  
Pittsburgh, PA 15219

Divesh Gupta, Esq.  
Constellation Energy  
Constellation NewEnergy Inc  
111 Market Place, Suite 500  
Baltimore, MD 21202

Craig G. Goodman, President  
National Energy Marketers Association  
3333 K Street NW, Suite 110  
Washington, DC 20007

Harry A. Warren, Jr.  
Washington Gas Energy Inc.  
13865 Sunrise Valley Drive, Suite 200  
Herndon, VA 20171-4661

Vera J. Cole, PhD.  
Mid-Atlantic Renewable Energy Association  
2045 Upper Rocky Dale Road  
Green Lane, PA 18054

Todd S. Stewart, Esq.  
Hawke McKeon and Sniscak LLP  
Interstate Gas Supply  
100 North Tenth Street  
Harrisburg, PA 17101

Bruce H. Burcat  
Mid Atlantic Renewable Energy Coalition  
P.O. Box 385  
Camden, DE 19934

Gary A. Jack  
Assistant Vice President Regional Affairs  
Duquesne Light  
411 Seventh Avenue  
Pittsburgh, PA 15219

Teresa K. Schmittberger, Esq.  
McNees Wallace and Nurick LLC  
Industrial Customer Groups  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108

Elizabeth Nottingham, President  
Verdigris Energy LLC  
P.O. Box 1777  
Allen, TX 75013

Glen Thomas, President  
GT Power Group LLC  
1060 First Avenue, Suite 400  
King of Prussia, PA 19406

Linda R. Evers, Esq.  
Stevens and Lee  
Washington Gas Energy Services  
111 North Sixth Street  
P.O. Box 679  
Reading, PA 19603-0679

Amy M. Klodowski, Esq.  
FirstEnergy Solutions Corp.  
800 Cabin Hill Drive  
Greensburg, PA 15601

Dana Pirone Carosella, Esq.  
Stevens & Lee PC  
Wal-Mart Stores East LP and Sams East Inc.  
620 Freedom Business Center, Suite 200  
King of Prussia, PA 19406

Mark C. Morrow, Esq.  
UGI Corporation  
460 North Gulph Road  
King of Prussia, PA 19406

Darryl A. Lawrence, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor Forum Place  
Harrisburg, PA 17101-1923

Bradley A. Bingaman, Esq.  
FirstEnergy  
76 South Main Street  
Akron, OH 44308-1890

Tori L. Giesler, Esq.  
FirstEnergy  
2800 Pottsville Pike  
P.O. Box 16001  
Reading, PA 19612-6001

Anthony D. Kanagy, Esq.  
Post & Schell  
Duquesne Light Company  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Michael Speerschneider, Senior Manager  
EverPower Wind Holdings, Inc.  
1251 Waterfront Place, 3<sup>rd</sup> Floor  
Pittsburgh, PA 19335

Benjamin L. Willey, Esq.  
Law Offices of Benjamin L. Willey LLC  
York Co. Solid Waste & Refuse Authority  
7272 Wisconsin Avenue, Suite 300  
Bethesda, MD 20814

Elizabeth P. Trinkle  
McNees & Wallace and Hurick LLC  
Citizens' Electric Company and Wellsboro  
Electric Company  
100 Pine Street  
PO Box 1166  
Harrisburg, Pa 17108-1166

Harry S. Geller, Executive Director  
PA Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

Elsie Caplan, Project Manager  
American Public Power Association  
1875 Connecticut Avenue, NW  
Washington, DC 20009

Shelby A. Linton-Keddie, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Pamela C. Polacek, Esq.  
McNees Wallace & Nurick  
Industrial Customer Groups  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

Christopher C. O'Hara  
Assistant General Counsel  
NRG Energy Inc  
211 Carnegie Center Drive  
Princeton, NJ 08540

Nancy, Vice President of Regulatory Affairs  
Electric Power Supply Association  
1401 New York Avenue NW, 12<sup>th</sup> Floor  
Washington, DC 20005



Romulo L. Diaz, Jr. (Pa. No. 88795)  
Anthony E. Gay (Pa. No. 74624)  
W. Craig Williams (Pa No. 306405)  
Exelon Business Services Company  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101-8699  
Phone: 215.841.5974  
Fax: 215.568.3389  
E-mail: [Craig.Williams@exeloncorp.com](mailto:Craig.Williams@exeloncorp.com)

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*Counsel for PECO Energy Company*