



COMMONWEALTH OF PENNSYLVANIA

March 24, 2014

**E-FILED**

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

**Re: Rulemaking to Amend the Provisions of 52 Pa. Code, Section 54.5  
Regulations Regarding Disclosure Statement for Residential and Small  
Business Customers and to Add Section 54.10 Regulations Regarding the  
Provision of Notices of Contract Renewal or Changes in Terms  
Docket No. L-2014-2409385**

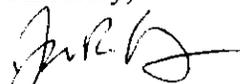
Dear Secretary Chiavetta:

On March 19, 2014, the Pennsylvania Public Utility Commission (“Commission”) issued a Secretarial Letter informing electric generation suppliers (“EGSs”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”) that it intends to promulgate a rulemaking that will revise the Commission’s current regulations regarding disclosure statement requirements for residential and small business customers. The Commission is also proposing to add new regulations codifying renewal/change in terms notice requirements. The Commission has determined that “the public interest requires extraordinary measures to be taken,” and accordingly, the rulemaking will take the form of a “final-omitted” proceeding. However, the Commission has given interested parties the opportunity to submit comments within five days.

Upon initial review of the rulemaking, the OSBA supports the substantive goals the Commission is intending to achieve, namely, to make disclosure statements more understandable and useful to customers, especially in the context of variable-rate products. However, the manner in which these goals are implemented and at what cost to customers is of great concern to the OSBA. Given the short time provided and without the benefit of initial comments from EGSs, the OSBA is unable to provide detailed comments at this time, but reserves all rights to participate in this proceeding going forward.

The OSBA believes that the Commission's truncated procedures may also hamper all other parties' ability to provide detailed comments and therefore strongly recommends that reply comments be permitted.

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Evans", written in a cursive style.

John R. Evans

Small Business Advocate