

CITIZEN POWER

Public Policy Research Education and Advocacy

March 24, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**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 L-2014-2409385**

Dear Secretary Chiavetta:

Enclosed please find Citizen Power's Comments, in the above referenced proceeding.

Sincerely,



Theodore Robinson
Counsel for Citizen Power

all of the information necessary for a customer to make an informed choice regarding the expiration of their contract or in the event that the terms of the contract have been modified. Although we still believe that at the expiration of a fixed term contract the customer should have to “opt-in” regarding any new contract that has revised terms and conditions, we consider the specificity of the new Regulations at Section 54.10 a definite improvement.

However, Citizen Power has two specific modifications that they believe would further improve the Regulations. First, we believe that the 50% rate increase threshold in 52 Pa. Code §54.5(c)(14)(iv) should be reduced to 30%. Although we understand the need to balance the costs of administering a variable rate product with the need to inform customers of issues that are material to them, in our opinion a 30% increase in rates is significant enough to require notice. Second, many residential customers receive large amounts of unwanted mail from multiple sources, which increases the possibility that notices regarding contract renewals or changes in contract terms may be inadvertently thrown out. In order to increase the number of residential customers that respond to the options notice, we propose that 52 Pa. Code §54.10(A)(2)(V) specify that the front of the envelope should indicate that the expiration or changes in terms of the customer’s electric supply contract may modify the rates paid by the consumer.

Respectfully Submitted,

By: 
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