



COMMONWEALTH OF PENNSYLVANIA

March 25, 2014

E-FILED

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

**Re: Proposed Rulemaking: Standards for Changing a Customer's Electricity
Generation Supplier
Docket No. L-2014-2409383**

Dear Secretary Chiavetta:

On March 18, 2014, the Pennsylvania Public Utility Commission ("Commission") issued a Secretarial Letter informing jurisdictional Electric Distribution Companies ("EDCs"), the Office of Consumer Advocate ("OCA"), and the Office of Small Business Advocate ("OSBA") that it intends to promulgate a rulemaking that will amend the Commission's current regulations at 52 Pa. Code, Chapter 57, to direct EDCs to accelerate switching time frames through off-cycle meter reads in a fashion that will permit Pennsylvania retail electric customers to switch suppliers within three (3) days or less. 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 seven (7) days.

Upon initial review of the rulemaking, the OSBA may be generally supportive of the substantive goal the Commission is intending to achieve, namely, to facilitate more expeditious switching time frames for customers who chose to switch to, or from, suppliers. 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 EDCs, 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,

John R. Evans
Small Business Advocate