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March 25, 2014

## VIA HAND DELIVERY

Honorable Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

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

PA PUC  
SECRETARY'S BUREAU

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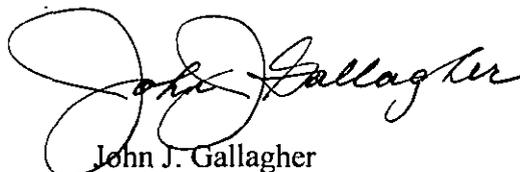
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Dear Secretary Chiavetta:

Enclosed please find one (1) copy of the Comments of Pike County Light & Power Company in response to the Commission's Secretarial Letter seeking comments in the above-captioned matter.

Should you have any questions concerning this correspondence please contact me at your convenience.

Sincerely,



John J. Gallagher

Enclosures



PCL&P is unique among Pennsylvania utilities.<sup>1</sup> PCL&P is an electric distribution company (“EDC”) serving approximately 4,700 residential and commercial customers in Pike County, Pennsylvania. PCL&P is a wholly-owned subsidiary of Orange and Rockland Utilities, Inc. (“O&R”). O&R provides electric service to approximately 225,000 customers in Orange, Rockland and Sullivan counties in the State of New York. Another subsidiary of O&R, Rockland Electric Company (“RECO”), serves approximately 72,000 customers in the State of New Jersey. PCL&P, O&R and RECO operate a fully integrated electric system serving parts of Pennsylvania, New York and New Jersey (collectively referred to as the “System”).<sup>2</sup> PCL&P receives all of its electricity through two 34.5 kV radial circuits that cross the Delaware River from Port Jervis, New York.

In addition to operating as part of a fully integrated electric system, PCL&P, O&R and RECO also use integrated computer systems to manage their operations. These computer systems include the Customer Information Management System (“CIMS”) billing system, Electric Data Interchange (“EDI”) system and Retail Access Information System (“RAIS”). Currently, all three companies follow the same rules in most areas, including the process for customer switching. Under the current computer systems, an enrollment request must be received at least 15 days prior to the next meter read date in order for the switch to be effective on that meter read date. Pursuant to waivers received in its default service proceedings, PCL&P follows the New York Uniform Business Practices to process switches. All three companies use the same procedure and timeframe.

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<sup>1</sup> *Petition of Pike County Light & Power Company for Approval of Its Default Service Implementation Plan*, Docket No. P-2013-2371666 (Order entered March 20, 2014). In support of its decision respecting PCL&P’s supply procurement, the Commission noted “the unique nature of this particular company.” *Id.*, at p. 13.

<sup>2</sup> Unlike the other utilities in the Commonwealth, PCL&P, by virtue of being part of the System, operates in the New York Control Area that is administered by the New York Independent System Operator (“NYISO”). In contrast, the other Pennsylvania electric utilities are members of the PJM Interconnection, LLC (“PJM”).

Given the short amount of time provided for filing comments, PCL&P had only a limited opportunity to develop implementation timeframes and cost estimates. Nevertheless, PCL&P has been able to determine that it will be unable to implement the proposed changes within six months, as delineated in the Letter. Due to the complexities and base logic of the CIMS changes required, implementation would take closer to one year. Moreover, these changes cannot be implemented for lighting or any other unmetered accounts. Finally, PCL&P's current cost estimates for implementing the proposed changes are a minimum of \$1.5 million.

Based upon the foregoing and in the event the proposed changes are ultimately adopted, PCL&P respectfully requests a waiver from the proposed changes to 52 Pa. Code, Sections 57.173 and 57.174. PCL&P is a small part of a much larger system. However, since the proposed changes would only be necessary in PCL&P's service territory, PCL&P's customers would have to bear all of the associated costs. Given PCL&P's small customer base, the impact of these costs on PCL&P's customers will be significant.

PCL&P notes that, pursuant to its currently effective default service plan, the Commission granted the Company's request for a waiver from 52 Pa. Code, Sections 57.173 and 57.174.<sup>3</sup> In fact, the Commission has consistently granted PCL&P's requests for a waiver from these provisions in the Company's last several default service proceedings.<sup>4</sup> Regardless of whatever amendments the Commission ultimately makes to 52 Pa. Code, Chapter 57, PCL&P respectfully requests that the Commission continue the effectiveness of these waivers. These

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<sup>3</sup> *Petition of Pike County Light & Power Company for Approval of Its Default Service Implementation Plan*, Docket No. P-2011-2252042 (Order entered May 24, 2012).

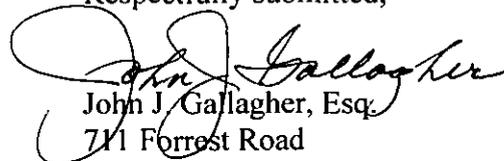
<sup>4</sup> *Petition of Pike County Light & Power Company for Approval of Its Default Service Implementation Plan*, Docket No. P-2010-2194652 (Order entered February 25, 2011); *Petition of Pike County Light & Power Company for Expedited Approval of Its Default Service Implementation Plan*, Docket No. P-2008-2044561 (Opinion and Order entered March 23, 2009); *Petition of Pike County Light & Power Company for Expedited Approval of Its Default Service Implementation Plan*, Docket No. P-00072245 (Opinion and Order entered August 16, 2007).

waivers were granted based upon a showing made by PCL&P that it is unlike any other Pennsylvania EDC and, because of its unique characteristics, it would not be reasonable to require PCL&P to comply with certain Commission regulations. There have been no changes in the facts or circumstances upon which PCL&P's waivers were based. Therefore, the Commission should continue the effectiveness of these waivers.

## Conclusion

For the reasons set forth above, PCL&P respectfully requests that the Commission eliminate the proposed six-month implementation timeframe. Alternatively, PCL&P respectfully requests a waiver of the proposed changes to 52 Pa. Code, Chapter 57.

Respectfully submitted,



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Date: March 25, 2014