



COMMONWEALTH OF PENNSYLVANIA

July 21, 2014

E-FILED

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

**Re: Interim Guidelines for Eligible Customer Lists
Docket No. M-2010-2183412**

Dear Secretary Chiavetta:

I am delivering for filing today the Comments, on behalf of the Office of Small Business Advocate, in the above-captioned matter.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INTERIM GUIDELINES FOR : **Docket No. M-2010-2183412**
ELIGIBLE CUSTOMERS LISTS :

**COMMENTS OF THE OFFICE
OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

In the public meeting held June 19, 2014, the Pennsylvania Public Utility Commission (“Commission”) issued a Tentative Order in the above-captioned matter seeking comments from interested stakeholders on the proposal made by the Commission’s Office of Competitive Market Oversight (“OCMO”) to require triennial company-wide solicitations of residential and small commercial customers by the Electric Distribution Companies (“EDCs”) in order to update the electric Eligible Customer Lists (“ECLs”), which are made available to electric generation suppliers (“EGSs”). The Office of Small Business Advocate (“OSBA”) submits the following comments pursuant to the Tentative Order.

II. COMMENTS

The OSBA takes no position on whether it is necessary for ECLs to be “refreshed,” and if so, how often. However, the OSBA is concerned about the costs and how such costs will be recovered. The Commission’s decision on whether to adopt OCMO’s proposal should be guided by EDC comments to this Tentative Order with respect to the estimated costs of performing triennial company-wide solicitations and the proposal should be rejected if the costs outweigh any potential benefits.

If the Commission decides to adopt OCMO’s proposal, all costs should be recovered from EGSs through a discount on purchased EGS receivables. The OSBA has consistently argued in default service proceedings that the costs associated with retail market enhancements should be recovered solely from

EGS. Similarly, the OSBA believes that the cost of updating ECLs should be the responsibility of EGSs. EGSs are provided these lists for their benefit.

In the alternative, if the Commission determines that EGSs should not be solely responsible for the costs of updating ECLs, such costs should be recovered through a non-bypassable charge applicable to all residential and small business distribution customers, including those who have switched to an EGS. It would be inequitable for costs to be recovered only from default service customers who choose not to shop, thereby subsidizing the benefits being afforded to EGSs.

III. CONCLUSION

In view of the foregoing, the OSBA respectfully requests that the Commission adopt Interim Guidelines for Eligible Customer Lists consistent with the OSBA's comments above.

Respectfully submitted,



Elizabeth Rose Triscari
Assistant Small Business Advocate
Attorney ID No. 306921

For:

John R. Evans
Small Business Advocate

Office of Small Business Advocate
300 North Second Street, Suite 1102
Harrisburg, PA 17101

Dated: July 21, 2014