

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 29, 2014

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101

RE: Rulemaking to Amend the Provisions of
52 Pa. Code, Section 54.5 and Section 54.10
and analogous 52 Pa. Code Section 62.75
Docket No. L-2014-2409385

Dear Secretary Chiavetta:

Enclosed for filing please find the Office of Consumer Advocate's Comments in the above-referenced proceeding.

If you have any questions, please feel free to contact me at the number listed above.

Respectfully Submitted,

A handwritten signature in black ink that reads "Hobart J. Webster".

Hobart J. Webster
Assistant Consumer Advocate
PA Attorney I.D. #314639
E-Mail: HWebster@paoca.org

Enclosure

cc: Dan Mumford, Deputy Director
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HHOUSE@pa.gov
Office of Competitive Market Oversight

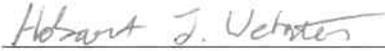
case that service contracts are initiated or expire on the same date, but the contract may expire in relatively close proximity. This could result in multiple notices to the consumer and lead to confusion.

The Office of Consumer Advocate (OCA) appreciates the opportunity to respond to the Commission's proposed rulemaking and fully supports the Commission in its endeavors to provide clarity regarding the concurrent application of 52 Pa. Code §§ 54.5 and 54.10 and 52 Pa. Code § 62.75. The OCA is in general agreement with the Commission's proposed rules and agrees that sending four renewal notices at different times to combined electric/natural gas customers is likely lead to confusion. Authorizing combined electric/natural gas providers to comply with the extended timeframes in 52 Pa. Code § 62.75 (g)(1) as proposed in the Commission's Tentative Order is the most reasonable course of action. Providing these notices on the abbreviated timeframes in 52 Pa. Code §§ 54.5 and 54.10 would likely not provide customers with enough time to make an informed decision regarding their combined electric/natural gas service in light of the time it takes to switch natural gas supplies.

The OCA supports the Commission's emphasis that the other provisions of 52 Pa Code § 54.10 still apply to combined electric/natural gas providers when presenting notice information for the customer's electric generation service. The OCA also supports the Commission's recommendation that suppliers provide combined electric/natural gas customers with the same rights for the natural gas service that they are required to provide for electric service. As the Commission correctly points out, providing a customer with the level of protection the electric regulations require would maintain consistency and minimize customer confusion.

The OCA looks forward to continuing to work with the Commission and the stakeholders to develop a retail choice market where consumers are fully informed, educated and fairly treated so that they can make informed and sound choices in the best interests of themselves, their families and their businesses.

Respectfully Submitted,



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DATED: July 29, 2014