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VIA FEDERAL EXPRESS

April 20, 2015

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

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APR 20 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: EDC plan filings for Seamless Moves and Instant Connects
Docket No. M-2014-2401103

Dear Secretary Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is a plan to implement Seamless Moves and Instant Connects in its service territory by July 1, 2016. PPL Electric is filing this plan pursuant to the Public Utility Commission's letter in this docket dated March 20, 2015.

PPL Electric has served copies of the enclosed plan on the Office of Competitive Market Oversight, the Office of Consumer Advocate and the Office of Small Business Advocate.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on April 20, 2015, which is the date it was deposited with an overnight express delivery service as shown on the delivery receipt attached to the mailing envelope.

Please date and timestamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding the enclosed plan, please call me at (610) 774-4254 or Cheryl T. Oehler, PPL Electric's Manager of Retail Supply Coordination, Scheduling and Settlement, at (610) 774-6567.

Very truly yours,

Paul E. Russell

Enclosures

cc: Office of Competitive Market Oversight - via Email
Tanya J. McCloskey, Esq.
Mr. John R. Evans

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDC plan filings for Seamless Moves :
and Instant Connects : Docket No. M-2014-2401103
:

**PPL ELECTRIC UTILITIES CORPORATION
COMPLIANCE FILING PLAN FOR IMPLEMENTING
SEAMLESS MOVES AND INSTANT CONNECTS
FOR METERED ACCOUNTS**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I. INTRODUCTION

On February 15, 2013, the Pennsylvania Public Utility Commission ("Commission") entered a Final Order in *Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service*, at Docket No. I-2011-2237952 ("*RMI Final Order*"). Pursuant to the *RMI Final Order*, the Commission directed Electric Distribution Companies ("EDCs") to develop and submit plans by the end of 2013 to implement Seamless Moves and Instant Connects by June 1, 2015. EDCs were directed to utilize existing supplier consultation processes in developing their plans. Finally, the Commission directed that the plans include the EDC's expected costs and its proposed mechanism for recovering those costs.

By Secretarial Letter dated August 13, 2014, the Commission permitted EDCs to delay the development of Instant Connects and Seamless Moves. Specifically, the August 13, 2014 Secretarial Letter provided EDCs with the option of delaying the development of *Instant Connects and Seamless Moves* if the implementation could hinder or delay the development of 3-business day supplier switching. Stated otherwise, the EDCs were encouraged to proceed with the development of Instant

Connects and Seamless Moves only if doing so would not impede the development of 3-business day switching.

On August 19, 2014, PPL Electric Utilities Corporation ("PPL Electric" or the "Company") responded to the Secretarial Letter dated August 13, 2014, regarding EDC implementation of Seamless Moves and Instant Connects (PPL Electric Utilities: Docket No. M-2014-2401103). Given the need for technical and business resources for implementing a frequent 3-day supplier switch timeframe, PPL Electric elected to delay the implementation of Seamless Moves and Instant Connects.

By Secretarial Letter dated March 20, 2015, EDCs were directed to file revised plans to implement Seamless Moves and Instant Connects in their service territories by July 1, 2016. PPL Electric hereby submits its compliance filing plan for implementing Seamless Moves and Instant Connects. As described in more detail below, PPL Electric will be able to fully implement Seamless Moves and Instant Connects for all metered accounts by July 1, 2016.¹

II. IMPLEMENTATION PLAN FOR METERED ACCOUNTS

A. GENERAL PROVISIONS

1. Definitions

In addition to terms defined elsewhere in this document, the following terms used in this Compliance Filing are defined as follows:

¹ On September 25, 2014, PPL Electric filed a Petition at Docket No. P-2014-2445072 seeking a temporary waiver of certain technical requirements of 52 Pa. Code §§ 57.174 and 57.179, including, among other things, a waiver of the requirement for non-metered account multiple off-cycle switching for the period of December 15, 2014 through September 30, 2015. By Secretarial Letter dated October 23, 2014, the Commission granted the waiver for non-metered account multiple off-cycle switching. Contemporaneously with this compliance filing, PPL Electric is separately filing a Petition at Docket No. P-2014-2445072 requesting to further delay the implementation of multiple off-cycle switches for non-metered accounts until December 31, 2016. For this reason, non-metered accounts are not included in this compliance filing for Seamless Moves and Instant Connects.

(ii) "3-Day Rule" is the 3 business day period immediately following the Company's receipt of an EDI 814 enrollment transaction within which PPL Electric will process the customer's supplier selection.

(iii) "CAP customer" is a customer currently enrolled in PPL Electric's Customer Assistance Program.

(iv) "EDEWG" or "Electronic Data Exchange Working Group" is the Commission's EDI Standards group.

(v) "EDI" or "Electronic Data Interchange" is a standardized format for the electronic transfer of data among entities.

(vi) "EGS" or "Supplier" is a retail electric generation supplier.

(vii) "Instant Connect" is the ability to start supply service on 'Day 1' of new utility service without the customer first having to go on default service.

(viii) "PLC" or "Peak Load Contribution" is an estimate of the load contribution of a retail or wholesale customer to the summer peak of the EDC, which is used to develop the capacity obligation of the host EDC.

(ix) "Seamless Move" is the ability for a customer to move to a new address without interruption in the service provided by the customer's EGS.

2. Information and Schedule

PPL Electric will post information regarding Seamless Move and Instant Connect procedures on the General Supplier Information webpage of its website. (<https://www.pplelectric.com/at-your-service/for-generation-suppliers/general-supplier-reference-information.aspx>). This website will serve as the main source of information for PPL Electric's implementation of Seamless Move and Instant Connect functionality.

Seamless Moves and Instant Connects will be offered by PPL Electric to all eligible metered residential customers and small commercial and industrial ("Small C&I") customers under 25 kW starting on July 1, 2016. Implementation by that date will require PPL Electric to modify both its billing and EDI systems and to educate its employees on the details of both new programs. As addressed below, PPL Electric requests Commission approval of these plans for implementing Seamless Moves and Instant Connects no later than July 1, 2016.

B. SEAMLESS MOVE (PARAMETERS/ASSUMPTIONS)

Below are the eligibility requirements for and process details related to customer participation in the Seamless Move process:

1. Eligibility Requirements

- Customers shopping with an EGS and moving within the PPL Electric service territory, including CAP customers.
- Customers that request, in the same telephone call, to disconnect at one premise and to connect at a different premises.
- Customers establishing a new account/location must be the same rate class (Residential/Small C&I) as the previous account/location.
- Customers with a move date that has not already occurred.
- Landlord Accounts are not eligible if they are not the party contracted with the Supplier. When a shopping tenant moves from a premise, his or her Supplier selection would not be assigned to the landlord.

2. Process Details

- PPL Electric will not ask if the customer wants to keep his or her EGS; the Company will automatically process the Seamless Move transaction for *shopping customers*.
- PPL Electric will transfer summary data or interval data indicator on a customer's old account to a new account:
 - Account retains same bill option, which includes: (1) utility consolidated billing (bill ready or rate ready); or (2) dual bill, where the EDC and the EGS issue separate bills to the customer.
 - Account retains same EGS rate code, which reflects the customer *contractual pricing*, when the *rate ready utility consolidated billing* option is in use.
 - Account retains same tax exemption percentage.
- No customer rescission is applicable to a move.
- Because the EGS for the new location is not changing, PPL Electric will not send a notification letter for Seamless Move transactions.

3. Rate Eligibility Requirements

Below are the rate eligibility requirements for customer participation in the Seamless Move process:

- Seamless Move will be offered only to metered Residential and Small C&I customers (less than 25 kW). The following chart lists eligible Seamless Move customer rate schedules:

Customer Group	Rate Schedule	Description
Residential	RS	RS – Residential Service
	RTS	RTS(R) – Residential Service – Thermal Storage
Small C&I	GS-1	GS-1 – Small General Service
	GS-3	GS-3 – Large General Service – Customers with less than 100 kW peak demand
	GH-2	GH-2(R) – Separate Meter General Space Heating Service

4. PPL Electric Requirements

Below are PPL Electric's requirements relative to the Seamless Move process:

- A new, utility-initiated EDI 814 Move transaction will be implemented in accordance with EDEWG approved 814 Move Implementation Guidelines. This will include an anticipated start date and new premise demographics, such as address, bill cycle, meter information, PLC tags, etc.
- If an account does not become active at the new location due to obligations not being met, such as security deposits or proof of identification:
 - PPL Electric will void the new account and send an EDI 814 Drop transaction to the Supplier.
 - This process will utilize the same logic as if an account were closed.
- PPL Electric will send an EDI 814 Change transaction with the updated start date if the anticipated connect date previously communicated on the EDI 814 Move transaction has changed.

- Once an EGS relationship is established with a pending active account, all EDI 814 Change transactions that a Supplier would typically receive for an active account will be sent by PPL Electric.

5. EGS Responsibilities

Below are the responsibilities of EGSs relative to the Seamless Move process:

- Contract portability is assumed. The business model requires that the contract remains with the customer despite the move.
- EGSs will draft new contract language for a move transaction that includes the contract portability clause.
- EGSs cannot reject a Seamless Move transaction. Therefore, no response to the EDI 814 Move transaction will be required.
- If an EGS does not want to maintain the contract with the moving customer, it will need to submit an 814 EDI Drop transaction. The effective/drop dates will be based on the existing switching/enrollment rules. All existing consumer notification regulations are applicable.

C. INSTANT CONNECTS (PARAMETERS/ASSUMPTIONS)

PPL Electric plans to implement the necessary Customer Service System and billing changes to enable customers to be automatically enrolled with the EGS selected on Day 1 of service. Currently a new connect customer is automatically placed on default service until the customer would choose to shop with an EGS subject to the existing switching/enrollment rules. Under the Instant Connect process, customers will benefit from having to take no further action in selecting an EGS, and EGSs will benefit from having the customer enrolled on the earliest possible start date of a new connect.

1. Eligibility Requirements

Below are the eligibility requirements for and process details related to customer participation in the Instant Connect process:

- New, non-shopping customers moving into PPL Electric's service territory, with a desire to shop on Day 1 of service will be eligible for Instant Connect.
- The customer must have a valid account number to provide to his or her intended Supplier in order for the Supplier to send in an EDI 814 Enrollment transaction.
- No Instant Connect is available when the connect date has already occurred.
- Landlord accounts are not applicable. The tenant would be eligible to shop on Day 1.

2. Process Details

- There will be a confirmation letter sent by PPL Electric for the Instant Connect EDI 814 Enrollment transaction consistent with existing shopping procedures.

3. Rate Eligibility Requirements

Below are the rate eligibility requirements for customer participation in the Instant Connect process:

- Instant Connect will be offered only to metered Residential and Small C&I customers (less than 25 kW). The following chart lists eligible Instant Connect customer rate schedules:

Customer Group	Rate Schedule	Description
Residential	RS	RS – Residential Service
	RTS	RTS(R) – Residential Service – Thermal Storage
Small C&I	GS-1	GS-1 – Small General Service
	GS-3	GS-3 – Large General Service – Customers with less than 100 kW peak demand
	GH-2	GH-2(R) – Separate Meter General Space Heating Service

4. PPL Electric Requirements

Below are PPL Electric's requirements relative to the Instant Connect process:

- PPL Electric will send out an EDI 814 Enrollment response the next business day after the EDI 814 Enrollment transaction is received from the EGS.
- If the account is not active when the EDI 814 Enrollment transaction is processed, the transaction will not be rejected by PPL Electric. Instead, PPL Electric will send an EDI 814 Enrollment response transaction to the EGS with the anticipated connect date.
- If an account does not become active at the new location due to obligations not being met, such as security deposits or proof of identification:
 - PPL Electric will void the new account, and an EDI 814 Drop transaction will be sent to the Supplier.
 - This process will utilize the same logic as if an account was closed.

- PPL Electric will send an EDI 814 Change transaction with the updated start date if the anticipated connect date previously communicated on the EDI 814 Enrollment response transaction has changed.
- Once an EGS relationship is established with a pending active account, all EDI 814 Change transactions that an EGS would typically receive for an active account will be sent by PPL Electric.
- PPL Electric will begin scheduling for the load, based upon the anticipated connect date.

5. EGS Responsibilities

Below are the responsibilities of EGSs relative to the Instant Connect process:

- EGS must send an EDI 814 Enrollment transaction to PPL Electric consistent with current enrollment practice.
- EGS must solicit the customer for demographic information for new customers moving into PPL Electric's service territory.
- EGS must send the customer a letter within three business days after receipt of the EDI 814 Enrollment response detailing the terms and conditions of its program. Additionally, the EGS is obligated to comply with all rules and regulations set forth in 52 Pa. Code Chapter 54.

III. TIMELINE

In order to meet the July 1, 2016 timeline required by the Secretarial Letter dated March 20, 2015, for implementation of Seamless Moves and Instant Connects for metered accounts, PPL Electric must modify both its billing and EDI systems. In addition, the Company must educate its employees, particularly its Customer Service Representatives, on the details of both new programs. Accordingly, in order to have

sufficient time to undertake these initiatives and meet the July 1, 2016 timeline, PPL Electric respectfully requests Commission approval of these plans for implementing Seamless Moves and Instant Connects for metered accounts on an expedited basis.

IV. COST RECOVERY

PPL Electric estimates the capital costs associated with implementing Seamless Moves and Instant Connects will be approximately \$700,000, which includes modifications to the Company's billing and EDI systems. PPL Electric proposes to seek recovery of these costs in future base rate filings.

Additionally, PPL Electric estimates the ongoing expenses associated with the need for additional Customer Service Representative time to administer the Seamless Moves and Instant Connects transactions will not exceed \$10,000 annually. PPL Electric also proposes to seek recovery of these costs in future base rate filings.

V. **CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission issue an Order accepting the Company's compliance plan for Seamless Moves and Instant Connects for Metered Accounts, as set forth herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Paul E. Russell", is written over a horizontal line.

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Date: April 20, 2015

Attorney for PPL Electric Utilities Corporation

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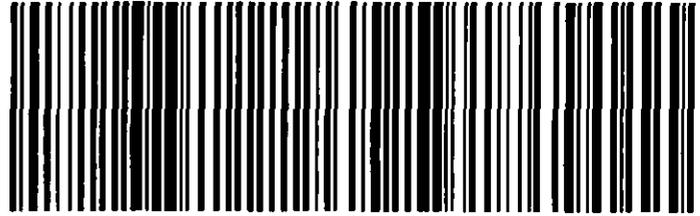
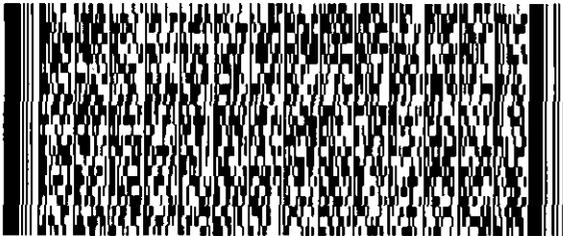
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