

PENNSYLVANIA ENERGY MARKETERS COALITION

May 28, 2015

Rosemary Chiavetta
Secretary, Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Dear Secretary Chiavetta:

Please find enclosed the comments of the Pennsylvania Energy Marketers Coalition (“PEMC”), in response to the Joint Revised Implementation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power (“FirstEnergy Utilities” or “FirstEnergy”) for seamless moves and instant connects, filed on April 20, 2015, in the following docket entries: M-2014-2401130; M-2014-2401155; M-2014-2401151; and M-2014-2401148.

Please do not hesitate to contact me with any questions or concerns regarding our comments.

Sincerely,



Antonio Soruco
Regulatory Consultant
Pennsylvania Energy Marketers Coalition
(PEMC)

Director, Regulatory and Legislative Affairs
P.R. Quinlan Associates Inc.
1012 14th Street NW, Suite 903
Washington, DC 20005

Enclosure

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

First Energy Utilities filings on Seamless Moves and Instant Connects)	Docket Nos. M-2014-2401130;
)	M-2014-2401155; M-2014-2401151;
)	and M-2014-2401148

COMMENTS OF THE PENNSYLVANIA ENERGY MARKETERS COALITION

The Pennsylvania Energy Marketers Coalition (“PEMC”)¹ appreciates this opportunity to submit comment in response to the Joint Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power (“FirstEnergy Utilities”) or (“FirstEnergy”) for seamless moves and instant connects, filed on April 20, 2015, in the following docket entries: M-2014-2401130; M-2014-2401155; M-2014-2401151; and M-2014-2401148.

The PEMC believes the implementation of seamless moves will not only benefit the customer by allowing them to move to a new location within their utility’s service territory without interruption of their energy supply, but will also further strengthen the attractiveness of the competitive market for customers who seek to shop for their energy.

The PEMC seeks clarification on one issue, however, that is important to ensuring a smooth transfer in the seamless move process: customer notification.

The PEMC agrees with the First Energy utilities that notifying the customer about the implications of the seamless move is important so the customer is educated about what entails as

¹ For purposes of this filing, the PEMC consists of Agway Energy Services, LLC (“Agway”), Pennsylvania Gas & Electric (“PAG&E”), and SouthStar Energy Services, LLC (“SouthStar”).

well as keeping the customer aware that the Electric Generation Supplier's (EGS) existing terms and conditions will also transfer from the current location to the new location. First Energy writes "...the Companies believe that customers should receive written notification of the seamless move to ensure the customer remains educated about the transfer in pricing, billing option and (if applicable) tax exemption status, and to help diffuse misplaced concerns about slamming." First Energy at 6.

The PEMC only seeks clarification on this proposed notification plan, referred to as the "move" letter by First Energy. We want to ensure that EGSs are expected to provide this written notification to the customer **solely as an informational notice** as opposed to requiring any sort of positive action by the customer (e.g., asking the customer whether he or she wishes to remain with his or her current EGS at the new location). Adding friction to the seamless move process in the form of additional action by the customer would undermine the entire purpose of the enhancement. The PEMC reiterates that it strongly supports educating customers about the transfer of the EGS terms and conditions and providing additional educational information, including to help "diffuse misplaced concerns about slamming." An educated consumer base which understands the full range of energy choices available to them is vital to strengthening the overall energy market in Pennsylvania.

CONCLUSION

The PEMC appreciates First Energy utilities work in implementing these enhancements to improve the energy shopping experience for customers in the Commonwealth of Pennsylvania. We recognize that much more work lies ahead and we therefore pledge our

support to the Commission and to the stakeholders involved in implementing seamless moves and instant connects plans.

Respectfully submitted,

PENNSYLVANIA ENERGY MARKETERS COALITION



Frank Caliva, III



Antonio Soruco

Regulatory Consultant
Pennsylvania Energy Marketers Coalition

Regulatory Consultant
Pennsylvania Energy Marketers Coalition

President
P.R. Quinlan Associates Inc.
1012 14th Street NW, Suite 1106
Washington, DC 20005

Director
P.R. Quinlan Associates Inc.
1012 14th Street NW, Suite 1106
Washington, DC 20005

CC: Agway Energy Services, LLC
South Star Energy Services
Pennsylvania Gas & Electric

Distribution to PEMC Members:

Michelle Mann
Compliance Paralegal
Pennsylvania Gas & Electric

Mark J. Pitonzo
Director of Business Development
Agway Energy Services, LLC

*Pennsylvania Energy Marketers Coalition
Seamless Moves and Instant Connects Plans*

May 28, 2015

Docket Nos. M-2014-2401130; M-2014-2401155; M-2014-2401151; and M-2014-2401148

Joe Monroe
Vice President, Regulatory & Market Development
South Star Energy Services