



May 27, 2015

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

MAY 28 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Docket Nos.: M-2014-2401130 Metropolitan Edison Company
M-2014-2401155 Pennsylvania Electric Company
M-2014-2401151 Pennsylvania Power Company
M-2014-2401148 West Penn Power Company

Dear Ms. Chiavetta:

The Electronic Data Exchange Working Group ("EDEWG") Leadership submits the following comments in response to the EDC plan filings for Seamless Moves and Instant Connects in the above Docket Nos.

The EDEWG Leadership facilitated multiple joint informal EDC-EGS conference calls with voluntary representation from the EDC-EGS community held in October and November 2013 to aide in formulating a uniform baseline for all EDCs to use for their specific implementation plans of Seamless Moves and Instant Connects. As a result, the group documented various business rules for qualifying a seamless move and instant connect as well as the development of the draft EDI 814 Move transaction to be used by the EDCs to finalize the Seamless Move. Absent Commission Order, the deliverables from the joint EDC-EGS conference calls did not require consensus or filing as the EDEWG recommended implementation for Seamless Move and Instant Connect.

EDEWG Leadership reviewed all of the EDC plan filings for Seamless Moves and Instant Connects and we found the plans for the FirstEnergy operating companies (FirstEnergy) do not operationally align with the rest of the EDC plan filings. Specifically, the FirstEnergy plans require the EGS to submit an 814 Enrollment transaction within 3 business days of receipt of the 814 Move transaction to complete the Seamless Move process. In the event the EGS fails to submit the 814 Enrollment transaction or it is received outside 3 business days, the result will be the customer receiving default service at the new location. The EDEWG Leadership disagrees with the requirement for the EGS to submit the EDI 814 Enrollment after receipt of the EDI 814 Move for the following reasons:

1. Such requirement, if approved for FirstEnergy, presents a different business process and technical implementation resulting in a lack of uniformity across Pennsylvania EDCs. This places additional cost on the EGSs to support a separate implementation instead of a consistent, uniform model for the entire marketplace to follow.
2. During the EDC-EGS conference calls, the additional requirement of the EDI 814 Enrollment was not put forth as the preferred model for finalizing the Seamless Move in the EDCs system. The model, as put forth in plan filings from the other EDCs, ends the process with the 814 Move being sent to the EGS. The group's understanding of the process relative to Seamless Move would be the EGS must serve the customer at the new service location as long as the customer meets all applicability requirements. The EGS maintains the opportunity to submit an EDI 814 Drop at any time.
3. Most importantly, once the customer completes their interaction with FirstEnergy requesting the move where the customer stated they wish to keep their current EGS, the customer expects their current EGS to move with them to their new service location. Under the FirstEnergy plan, in the event the EGS does not submit the 814 Enrollment or such submission is outside the 3 business day window, the customer's new service location will receive default service at. This business model is not a true seamless move and presents a significant risk for negative customer impact.

EDEWG Leadership believes in consistent, uniform business processes and technical solutions for supporting the retail energy marketplace. We appreciate this opportunity to provide comments and continues our commitment in the development of the Commonwealth's retail markets for the benefit of Pennsylvania's consumers.

Sincerely,



Christine Hughey
Christine Hughey
EDEWG EGS Co-chair
Constellation (An Exelon Company)



Susan Scheetz
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