

Tori L. Giesler, Esq.
(610) 921-6658
(610) 939-8655 (Fax)

610-929-3601

October 13, 2015

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: *Joint Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Seamless Moves and Instant Connects;*
Docket Nos. M-2014-2401130; M-2014-2401155; M-2014-2401151;
M-2014-2401148

Dear Secretary Chiavetta:

Pursuant to the Commission's Final Order entered on October 1, 2015 in the above-referenced proceedings, enclosed herewith for filing is the Second Revised Joint Seamless Moves/Instant Connects Implementation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

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Enclosures

**SECOND REVISED SEAMLESS
MOVES/INSTANT CONNECTS
IMPLEMENTATION PLAN**

**METROPOLITAN EDISION COMPANY
PENNSYLVANIA ELECTRIC COMPANY
PENNSYLVANIA POWER COMPANY
WEST PENN POWER COMPANY**

October 1, 2015

**SECOND REVISED SEAMLESS MOVES/INSTANT CONNECTS
IMPLEMENTATION PLAN
METROPOLITAN EDISION COMPANY, PENNSYLVANIA ELECTRIC COMPANY,
PENNSYLVANIA POWER COMPANY AND WEST PENN POWER COMPANY**

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BACKGROUND

The Pennsylvania Public Utility Commission's ("Commission") order entered February 15, 2013 at Docket No. I-2011-2237952 ("End State Order") directed electric distribution companies ("EDCs") to develop and submit plans to the Commission by the end of 2013 to implement "seamless moves" and "instant connects" in their respective service territories by June 1, 2015.¹ Consistent with that directive, Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power"), and West Penn Power Company ("West Penn") (each of which may be referred to as "Company" and/or in combination as "Companies") filed a joint plan on December 31, 2013 outlining how seamless moves and instant connects would be implemented throughout their service territories ("Original Plan").

Via Secretarial Letter issued on August 13, 2014, the Commission postponed the implementation of these plans, in order to allow EDC resources to be focused towards implementing new regulations that accelerated the supplier switching process. On March 20, 2015, the Commission issued a second Secretarial Letter on this topic, extending the timeline by which EDCs must implement seamless moves and instant connects to July 1, 2016 ("March 20 Secretarial Letter"). The March 20 Secretarial Letter directed that, within thirty days, EDCs file revised plans accounting for the extended implementation deadline and adjusting for the three business day switching timeline in place under the new regulations. The March 20 Secretarial Letter also called for comments to be filed in response to the EDCs' revised plans. Consistent

¹ As defined in the Commission's End State Order, "seamless moves" are the ability of a customer's choice of supplier, also known as an electric generation supplier ("EGS"), to move with the customer to a new address without interruption, and "instant connect" is the ability of supply service to start on "day one" of new utility service without the customer first having to take default service. *Investigation of Pennsylvania's Retail Electricity Market: End State of Default Service*, Docket No. I-2011-2237952 (Order entered February 15, 2013), pp. 70, 74-75.

with that directive, on April 20, 2015, the Companies filed a Revised Joint Implementation Plan, which updated the Companies' Original Plan for the new implementation deadline, as well as accounting for various process changes that arose following acceleration of the switching process under Section 57.174 of the Commission's regulations ("Revised Plan").

On October 1, following consideration of not only the Companies' Revised Plan but also comments filed on May 28, 2015 by various parties in response to that Revised Plan, the Commission entered a Final Order directing the final model that the Companies are to implement to effectuate instant connects and seamless moves. In addition to directing the model to be implemented, the Commission directed an implementation deadline of September 30, 2016, as well as addressed cost recovery. The Commission also called for the Companies to submit a revised plan and tariff revisions consistent with the Final Order. The Companies submit this Second Revised Joint Implementation Plan ("Second Revised Plan") in compliance with the Commission's October 1, 2015 Final Order.

SEAMLESS MOVES IMPLEMENTATION

Eligibility

Customer eligibility shall be based upon a customer meeting each of the following criteria:

1. Customer must have an active account with the Company;
2. Customer must have an existing relationship with an EGS serving at the customer's current premise;
3. Customer does not have a pending change to a new EGS;
4. Customer plans to physically move from their current premise to a new premise within the same Company service territory, and provides the Company at least one day advance notice;
5. The new location must be an active premise, which is a necessary prerequisite for the Company to assign the seamless move customer an account number on a pending active basis;²
6. The timeframe during which a gap in service between the two service locations (current and new) may occur is limited to three days;
7. Customer will remain within the same residential or commercial rate class, with compatible metering capabilities to enable billing consistent with Table 1, below;
and
8. Customer will use the same account name at the new premise.

Although most of the eligibility criteria are self-explanatory, further detail is provided below for items 7 and 8 to clarify the Companies' intent and reasoning.

² A "pending active" basis means an account number is set to become active at a specified future date.

Criterion 7. *Customer will remain within the same residential or commercial rate class, with compatible metering capabilities to enable billing.*

The residential and commercial rate classes may be comprised of multiple rate schedules under each Company’s individual retail tariff. Table 1 reflects those residential and commercial rate schedules at each Company that will be eligible for the use of seamless moves.

Table 1

Eligible Rates for Seamless			
<u>Operating Company</u>	<u>Rate Code</u>	<u>Account Class</u>	<u>Rate Description</u>
Metropolitan Edison	RS	Res	Residential Service
	GSV	Res	Volunteer Fire Co. and Non Profit
	GSS	Com	General Service Secondary - Small
Penelec	RS	Res	Residential Service
	GSV	Res	Volunteer Fire Co. and Non Profit
	GSS	Com	General Service Secondary - Small
PennPower	RS	Res	Residential Service
	GSR	Res	Volunteer Fire Co. and Non Profit
	GSS	Com	General Service Secondary - Small
WestPennPower	RS10	Res	Residential Service
	GS10	Res	Volunteer Fire Co. and Non Profit
	GS20	Com	General Service Secondary - Small

Similarly, a customer that is transferring EGS-billed dynamic rates (such as time-of-use rates) from the old premise to the new premise will only be eligible where the metering at the new premise has compatible metering capabilities in order to enable billing.

Criterion 8. *Customer will use the same account name at the new premise.*

Eliminating a change in legal entity is critical to meet the Commission’s directive that the EGS move with the customer to a new address without interruption. The assignment of a

new legal entity would mean the Companies would be serving a new customer, rather than the same customer. Customers who use a different account name at a new premise will, instead, be handled as an instant connect, as described later in the Second Revised Plan.

Notification

Currently, customers can indicate a move to a new premise by contacting the respective Company they wish to take delivery service from. The Second Revised Plan permits seamless moves to be processed by telephone, subject to the eligibility criteria provided above. The customer must provide the Company the requested disconnect date from the current premise and the connect date at the new premise during the same telephone call. This information is critical in order to connect the customer to the two different premises, establish eligibility, and process a seamless move. Seamless move requests will not be known, and therefore not processed, if the customer notifies the Company of a disconnection of service at one premise, and then at a different period in time contacts the Company about connecting service at a new premise. Further, seamless moves have the potential to result in overlapping services or a gap in service when a disconnect at the current premise and a connect at the new premise take place on different dates. The gap in service between the current premise and the new premise can never be longer than three days.

The Second Revised Plan effectively provides for the customer's choice of EGS to move with the customer to a new address without interruption. Seamless moves will not trigger the need for the Companies to send the confirmation letter described in 52 Pa. Code § 57.173 due to the fact that the customer is not requesting a change of the EGS.

Process

Where a customer requests a move and meets the eligibility criteria for seamless moves, the respective Company will notify the customer that the customer will retain the existing EGS at the new premise. In order to enable the Companies to effectuate a seamless move, EGSs will be required to maintain the same pricing, billing option, and tax exemption status at both the current premise as well as the new premise until the seamless move is completed. This requirement helps ensure that the Companies will not inadvertently take action that would trigger the requirements of 52 Pa. Code § 54.5(g).

If the customer meets the eligibility requirements for a seamless move, the Company will submit an EDI 814 Move transaction that same day to notify the EGS of a pending seamless move. The 814 Move transaction does not currently exist and must still be developed and approved by the Commission's Electronic Data Exchange Working Group ("EDEWG"). However, the Companies anticipate that the 814 Move transaction will generally include the same information as the existing EDI Enrollment transaction. The primary functions of the 814 Move transaction are to notify an EGS of a pending seamless move, provide relevant information regarding the move, and initiate the enrollment process for the new service location. Attachment A includes information the Companies suggest be included in the new 814 Move transaction.

Successful seamless moves will result in the EGS becoming the EGS of record as of the customer's move-in date at the new premise, even if the move-in date is not a scheduled meter read date. If the customer changes the move-in date, the Company will notify the EGS of the revised move-in date via an EDI 814 Change transaction. However, requests to backdate the connection date will not be permitted. If the customer never moves into the new premise, the Company will send the EGS an EDI drop transaction for the pending account at the new premise.

To effectively price transmission service and generation capacity obligations, each premise has an assigned network service peak load (“NSPL”) for transmission capacity and a peak load contribution (“PLC”) for generation capacity. The PLC and NSPL are premise-specific, which means customers do not transfer the NSPL and PLC capacity obligations from their current premise to a new premise. Instead, the Companies must assign new NSPL and PLC capacity obligations at the new premise, which are calculated as the class average default value until new values are assigned annually on January 1st for NSPL and June 1st for PLC (based upon historical usage at the new premise).

When a contract is ported to the new premise, differences may occur to NSPL and PLC values that were assigned due to the fact the old premise may not hold the same values as the new premise. The 814M for the new premise will include updated NSPL and PLC values in order to help address this concern.

INSTANT CONNECTS IMPLEMENTATION

Eligibility

The Companies' strategy for instant connects is primarily designed for customers establishing electric service with one of the Companies for the first time. However, there are other less common situations where instant connects may occur. Below is a list of situations where the Companies envision instant connects may take place:

1. Customer is moving into the Company service territory and establishing an account with the Company for the first time;
2. Customer is re-establishing a Company account after a set number of days expire since the closure of the same Company account;
3. Service is upgraded or reconfigured, necessitating that an additional Company account for the same customer be established;
4. There is a change in the party responsible for service, meaning that a new legal entity will receive service from the Company; or
5. A new customer account is established based upon an investigation (i.e., revenue protection/theft of service).

The above list is not necessarily exhaustive, but is meant to represent the most common situations in which instant connects would be applicable. In each situation, instant connects will only be available at locations that are active premises, a necessary prerequisite for the Companies to assign the new customer an account number on a pending active basis. An active premise is key in programming development in order to associate a customer with a specific premise. This effectively means that new building construction would not be eligible for instant connects where the developer or builder is establishing service for the first time with no meter present, but would

be eligible for the end-use customer that is transferring electric service responsibility from the developer or builder to the customer. Instant connects will be made available to customers of all rate classes, regardless of size.

Notification

Currently, customers may indicate a move to a new premise by contacting the respective Company they wish to take delivery service from. Instant connects must be processed by telephone, subject to the eligibility criteria provided above. The customer must provide the Company the requested move-in date and satisfaction of any security deposit or identification requirements.

Process

As discussed above, instant connects will be processed by the same means that new service is currently processed. An EGS will continue to submit to the Company an EDI 814 Enrollment transaction for customers that elect EGS-provided service. The 814 Enrollment will require an indicator to show the enrollment is due to an instant connect, which indicator must be developed and approved by EDEWG. The customer's move-in date, fulfillment of any required security deposit or identification requirements, and the Company's receipt of the 814 Enrollment transaction must all be received into the EDC's billing system prior to the move-in date in order to be effective as of the move-in date. Enrollments received on or after the move-in date will follow standard enrollment rules and time periods in accordance with the Companies' retail and supplier tariffs. If the customer changes their move-in date, the Company will notify the EGS of the new move-in date via an EDI 814 Change transaction. However, requests to backdate the

connection date will not be permitted. If the customer never moves into the new premise, the Company will send the EGS an EDI Drop transaction for the pending account at the new premise.

The primary differences between the current process and the new instant connect process are in that the Companies will:

1. Accept and hold a pending enrollment from an EGS for a pending active account;
and
2. The EGS will become the EGS of record as of the customer's move-in date at the new premise, even if the move-in date is not a scheduled meter read date.

As previously noted, an instant connect is the ability of supply service to start on "day one" of new utility service without the customer first having to go on default service. It should be clarified, though, that "day one" is not the same as being effective on one-day notification to the Company.

Residential and small commercial customers will continue to use the Companies' Customer Referral Program (for as long as that program remains active), with 814 Enrollments received from participating EGSs to be processed as an instant connect, subject to the above eligibility. The Companies will not contact the EGS on behalf of the customer, which means that customers wishing to select an EGS (and who are not participating in the Customer Referral Program) should directly contact their selected EGS after receiving their pending active account number from the Company. The EGS (notified either by the Customer Referral Program or directly by the customer) will then submit an EDI Enrollment to the Company for the pending account number.

As discussed with respect to seamless moves, in order to effectively price transmission service and generation capacity obligations, each premise has an assigned NSPL for transmission service and a PLC for generation capacity, which are both premise-specific. When a customer

calls to initiate electric service, the Companies assign new NSPL and PLC obligations at the new premise, which are calculated as the class average default value until new values are assigned annually on January 1st for NSPL and June 1st for PLC based upon historical usage.

However, unlike seamless moves, instant connects are applicable to the establishment of a new legal entity for receipt of electric service. New PJM rules, effective January 1, 2015, allow the Companies to report yesterday's PLC and NSPL values by supplier, therefore, the Companies do not anticipate differences between what an EGS should have been charged for transmission and generation capacity at the new premise versus what an EGS is actually charged.

ADDITIONAL CONSIDERATIONS

The Companies explored several process proposals to accommodate both seamless moves and instant connects. Functionality of this Second Revised Plan is premised on the assumption that the Companies are the providers of default service. In the event that the default service model changes such that another entity becomes responsible for providing default service, the Companies may need to amend or withdraw this Plan, depending upon the scope and breadth of any changes to the EDC-customer relationship.

COST AND COST RECOVERY

The design and implementation of seamless moves and instant connects will cause the Companies to incur costs in a variety of areas, such as EDI programming, billing system changes, development of tracking statistics, and workflow changes. Further, a new contact center process and associated training will be needed, including changes to call center scripts. The Companies estimate a total cost of approximately \$2.5 million to design and implement seamless moves and instant connects based upon the criteria set forth in the Companies' Second Revised Plan. Costs for both seamless moves and instant connects will be included in the determination of revenue requirements in each of the Companies' next distribution base rate proceedings.

IMPLEMENTATION TIMELINE

The Commission directed an implementation deadline of September 30, 2016, giving the Companies nearly the same duration they requested in both their Original and Revised Plans to implement seamless move and instant connect functionality. The Companies are confident that they will be able to meet this deadline for instant connect functionality. While they are undertaking an effort to meet the September 30, 2016 deadline for seamless moves, the Companies do have concerns with their ability to effectively implement this functionality given the number of changes

directed over their proposed model, particularly when considered against other projects scheduled during the implementation period.

The Companies' current software platform, SAP, is comprised of a number of modules that integrate together, affecting almost every part of managing the Companies' business. To implement new functionality such as seamless moves and instant connects, SAP transports are used because a production system cannot be used for development. An SAP transport involves a complex and detailed process, which includes development, testing, quality assurance, and implementation.

The extensive programming and testing of seamless moves and instant connects must be completed with a quarterly technical maintenance release prior to the planned in-service date in order to ensure proper operation of seamless moves and instant connects. Under their Original and Revised Plans, the Companies would have created an 814M EDI transaction for the sole purpose of providing notice to EGSs (rather than as transactions requiring additional action). The Companies' proposals also allowed the Companies to modify the existing 814 enrollment logic to fit the new functionality. However, the Final Order now requires the Companies to program their system in order to allow the 814M EDI transaction to both provide notice, as well as trigger an action to port the supplier to the customer's new location. This is a significant change which introduces additional risk to the Companies' processes, and as such will require a much large scope of programming and testing.

Another significant modification to the Companies' implementation strategy relates to their obligation to automatically port a customer's EGS to the new location. Under this model, an EGS's opportunity to reject a seamless move is no longer available, and the Companies are required to establish more restrictive eligibility requirements than originally proposed. These more stringent

restrictions will require additional programming that wasn't included in the Companies' original project scope when estimating their implementation timeline needs. The Companies' proposal capitalized upon parameters that their SAP system is already designed around, and which are therefore already programmed into the system. The Companies now must program and test additional parameters and logic to be established for the proper functionality of seamless moves as directed by the Final Order.

As mentioned above, the Companies are endeavoring to meet the September 30, 2016 deadline for all functionality directed by the Final Order, utilizing its scheduled August 2016 SAP transport. However, the additional programming and testing that will be required is expected to overlap with efforts already planned during that very same period for the roll out of smart meter system functionality associated with the Companies' move-in and move-out processes. Therefore, it is possible that the Companies may determine there is a need to seek a three-month extension of time to implement seamless moves in order to ensure proper system functionality. In addition, the Companies' Second Revised Plan, like its Original and Revised Plans, requires that a new 814 Move transaction and 814 Enrollment indicator be approved by EDEWG before the Companies are fully able implement this functionality.

ATTACHMENT A

Possible Data Elements in an 814 Move Transaction

- Beginning segment indicating transaction number and date
- EDC name and Data Universal Numbering System (“DUNS”) information
- EGS name and DUNS information
- Customer name as it appears on the customer’s bill
- Customer’s new service address
- City/state/zip and county for customer’s new service address
- Customer contact name and communication number – if available
- Bill to party – if applicable
- Customer billing address – if applicable
- Customer billing city/state/zip – if applicable
- Bill to contact name and communication number – if applicable/available
- Third party name, contact information, address, and city/state/zip to receive a copy of notices – if applicable
- Third party name, contact information, address, and city/state/zip to receive a copy of bills – if applicable
- Transaction reference number and enrollment request for generation services
- Customer Move status indicator
- EGS account number – if available
- EDC account number at new location
- EDC account number at old location
- EDC billing cycle

- Consolidated billing or dual billing indicator
- Party responsible to calculate the charges on the bill
- PJM LMP bus number – if applicable
- Summary interval data at account level – if applicable
- Special meter configuration – if applicable
- Estimated start date
- Tax exemption percent (rate ready only)
- PLC
- NSPL
- EDC meter number
- Loss factor
- EDC load profile, rate class, and rate subclass – if applicable
- EGS rate code (rate ready only)
- Service voltage
- EDC meter reading cycle, meter type, meter multiplier, and number of dials/digits
- Metering information sent on the 867 transaction

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Plan of Metropolitan Edison	:	Docket No. P-2014-2401330
Company, Pennsylvania Electric Company,	:	Docket No. P-2014-2401155
Pennsylvania Power Company and West	:	Docket No. P-2014-2401151
Penn Power Company for Seamless Moves	:	Docket No. P-2014-2401148
and Instant Connects	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Service by first class mail and email, as follows:

John R. Evans
Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101
joevan@pa.gov

Antonio Coruco
P.R. Quinlan Associates, Inc.
1012 14th Street NW, Suite 903
Washington, DC 20005
*Counsel for Pennsylvania Energy Marketers
Coalition*

Johnnie E. Simms
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
josimms@state.pa.us

Christine Hughey
Constellation NewEnergy
1221 Lamar Street
Suite 250
Houston, TX 77010
*On behalf of the Electronic Data Exchange
Working Group*

Hobart J. Webster
Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Deanne O'Dell
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17108-1248
Counsel for Retail Energy Supply Assoc.

David P. Zambito
Cozen O'Connor
17 North Second Street
Suite 1410
Harrisburg, PA 17101
Counsel for FirstEnergy Solutions

Dated: October 13, 2015



Tori L. Giesler
Attorney No. 207742
FirstEnergy Service Company
2800 Pottsville Pike
P.O. Box 16001
Reading, Pennsylvania 19612-6001
(610) 921-6658
tgiesler@firstenergycorp.com