

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
For Approval of a Default Service Program : Docket No. P-2015-2526627
And Procurement Plan for the Period :
June 1, 2017 through May 31, 2021 :

DIRECT TESTIMONY
OF
BARBARA R. ALEXANDER
Consumer Affairs Consultant

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

April 20, 2016

1 **I. INTRODUCTION AND SUMMARY**
2

3 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

4 A. My name is Barbara R. Alexander. I use the title of Consumer Affairs Consultant. My
5 address is 83 Wedgewood Dr., Winthrop, ME 04364. I appear in this case as a witness
6 on behalf of the Office of Consumer Advocate (OCA).

7 Q. WHAT IS YOUR BACKGROUND AND EXPERIENCE WITH RESPECT TO THE
8 ISSUES ON WHICH YOU ARE PROVIDING TESTIMONY IN THIS PROCEEDING?

9 A. I opened my consulting practice in March 1996, after nearly ten years as the Director of
10 the Consumer Assistance Division of the Maine Public Utilities Commission. While
11 there, I testified as an expert witness on consumer protection, customer service and low-
12 income issues in rate cases and other investigations before the Commission. My
13 consulting practice is directed to consumer protection, customer service and low-income
14 programs and policies relating to the regulation of the telephone, electric and gas
15 industries. In particular, I have focused on the changes in policies and procedures
16 required by state regulation in the transition to retail competition. My recent clients
17 include state utility consumer advocates in Pennsylvania, New Jersey, Maine,
18 Washington, Delaware, California, and AARP (in Montana, Illinois, New Jersey, the
19 District of Columbia, Mississippi, Maryland, Delaware, and Maine). Among my
20 publications are: Retail Electric Competition: A Blueprint for Consumer Protection, (U.S.
21 Department of Energy, Office of Energy Efficiency and Renewable Energy, October,
22 1998). Among my areas of expertise are policies and programs related to Default Service

1 and related issues concerning the transition to retail competition for both the electric and
2 natural gas industries. I have filed testimony on default service policies in Maine,
3 Montana, Maryland, District of Columbia, Texas, New Jersey, and Pennsylvania and
4 made numerous presentations on this issue before state regulatory commissions and at
5 national conferences.

6 I am a graduate of the University of Michigan (B.A. 1968) and the University of
7 Maine School of Law (J.D. 1976).

8 I have been involved in the implementation of retail electric and natural gas
9 competition in Pennsylvania on behalf of the OCA for several years. I filed testimony on
10 consumer education, consumer protection, supplier licensing, customer enrollment, default
11 service, and Code of Conduct issues for the OCA in the Commission's electric
12 restructuring proceedings in 1997 and 1998 and in the natural gas restructuring cases
13 beginning in 1999. I have provided testimony submitted on behalf of the OCA on service
14 quality and low-income program issues associated with recent electric and natural gas
15 distribution company mergers. With respect to issues relating to retail market competition
16 policies, I have filed testimony on behalf of the OCA on policies that should govern the
17 planning and acquisition of Default Service for residential customers and on proposals to
18 adopt a Purchase of Receivables (POR) programs, Customer Referral Programs, and other
19 "retail market enhancement" programs for electric and natural utilities, including
20 FirstEnergy distribution companies, Duquesne Light Co., PECO Energy (both gas and
21 electric service), PPL Electric, UGI Utilities, Columbia Gas of Pennsylvania, T.W.
22 Phillips Gas and Oil Co. and Peoples Natural Gas. I submitted Testimony on behalf of the
23 OCA in PPL Electric's prior Default Service Program applications in 2012 and 2014. My

1 updated CV with the specific identification of these proceedings is attached as Exhibit
2 BA-1.

3
4 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

5 A. I am filing Direct Testimony on behalf of the OCA with respect to the proposal by PPL
6 Electric Utilities Corp. (“PPL”) to continue its current Standard Offer Program (SOP) as
7 part of the proposed Default Service Programs (DSP) from June 1, 2017 through May 31,
8 2021. In addition, I address the growing concern that PPL’s Customer Assistance
9 Program [called OnTrack] customers are paying more for essential electric service when
10 served by Electric Generation Suppliers (EGS).

11 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.

12 A. The following conclusions and recommendations are discussed in further detail in my
13 testimony:

- 14 ▪ PPL’s SOP should be continued only pursuant to several conditions. First, ratepayers
15 should not fund any additional costs for this program that operates as a marketing
16 subsidy for participating EGSs. Second, the program’s disclosures need additional
17 reform as I have presented in more detail in my testimony. Third, PPL should be
18 required to undertake additional research into customer understanding and experience
19 with this program as presented at the time of enrollment, as well as customer
20 understanding and experience with the EGS renewal offers after the 12-month
21 program. If these conditions are accepted, I recommend that the program reflect a
22 May 31, 2021 sunset date. At that time, should PPL seek to renew the program, it
23 should do so with a separate filing that reflects the results of my required

1 recommendations and their study and analysis of customer experience.

- 2 ■ PPL's On Track customers are low income and receive financial assistance paid for
3 by other residential customers. These customers should be further protected against
4 the potential of paying more for essential electric service and potentially increasing
5 the subsidy for this valuable program from other residential customers when EGSs
6 charge higher prices compared to PPL's Price to Compare.

7 **II. BACKGROUND ON THE STANDARD OFFER REFERRAL PROGRAM**

8
9 Q. PLEASE DESCRIBE THE GENESIS OF THE STANDARD OFFER CUSTOMER
10 REFERRAL PROGRAM AND ITS IMPLEMENTATION IN THE 2013-2014 DSP.

11 A. The Commission issued its Final Order concerning proposals for its Intermediate Work
12 Plan to adopt retail market enhancements on March 2, 2012.¹ This Order contained
13 recommendations concerning how the EDCs should implement several market
14 enhancement programs, including the Standard Offer Customer Referral Program. The
15 Commission's Order established the following key parameters for this Program²:

- 16 • "The terms and conditions of the standard offer must be presented to customers
17 before they decide to enter the program." The enrollment by a customer will be
18 on an "opt-in" or voluntary basis.
- 19 • Participating EGSs must offer a 7% reduction in the Price to Compare (PTC) as
20 compared to the PTC in effect at the time of the offer.
- 21 • The contract term must be a minimum of four months and a maximum of twelve

¹ Investigation of Pennsylvania's Retail Electricity Market: Intermediate Work Plan, Docket No. I-2011-2237952, Final Order, (March 2, 2012) (Intermediate Work Plan Final Order).

² Intermediate Work Plan Final Order at 31-32.

1 months.

2 • The EGS must not charge an early termination fee during the term of the Referral
3 contract.

4 • The EGS must notify the participating customer at the end of the Referral Program
5 term of options to continue service (without the obligation of the 7% discount) and
6 that customers will remain with the EGS on a “month to month basis,” unless the
7 customer takes affirmative action to choose either a product offered by the EGS, a
8 product offered by another EGS, or elects to move to Default Service.

9 • The “bulk” of the costs for this program must be borne by the participating EGSs.

10 Q. FOLLOWING THIS ORDER, HOW WAS THIS REFERRAL PROGRAM
11 IMPLEMENTED BY PPL?

12 Q. PPL’s SOP was approved in its DSP II proceeding and was initiated with enrollments
13 beginning in August 2013. PPL’s program requires EGSs to offer a fixed price
14 agreement for 12 billing months to participating customers. The fixed price is set at 7%
15 below the Price to Compare (PTC) in effect at the time of a customer’s agreement to
16 participate in the program. Pursuant to the approval of its program, PPL’s customer
17 service representatives solicit interest in the program when customers call for any
18 purpose other than emergencies or relating to service termination. If a customer indicates
19 an interest in the program, PPL transfers the call to PPL Solutions, a third party
20 contractor engaged by PPL to discuss the program in more detail and solicits the
21 customer’s consent to enroll in the program. The customer is allowed to enroll with an
22 EGS that has agreed to the terms of the SOP. If a customer agrees to be enrolled with an
23 EGS (or agrees to participate but does not have a preference on a specific EGS, in which

1 case PPL selects the EGS randomly from those EGSs participating the program), PPL
2 notifies the selected EGS and the EGS issues its disclosures and terms and conditions to
3 the customer and submits an electronic order for enrollment to PPL. At the time of the
4 consideration of this program in DSP III, 77,463 residential customers had enrolled in
5 this program from August 2013 through May 2014 and 10-12 EGSs were participating in
6 the program. The Commission's DSP III Order³ continued the SOP with certain changes
7 to the disclosures that PPL (and its contractor, PPL Solutions) were required to use to
8 present and describe the program to customers. In addition, PPL's proposal to develop
9 and implement a web page to allow customers to enroll in the SOP electronically was
10 approved.

11 **III. ANALYSIS OF PPL'S IMPLEMENTATION OF THE SOP**

12

13 Q. PLEASE DESCRIBE PPL'S IMPLEMENTATION OF THE SOP AS DESCRIBED IN
14 ITS DSP IV FILING.

15 A. According to PPL, as of December 31, 2015, approximately 210,150 eligible small
16 commercial and residential customers were transferred to a third-party service provider
17 and approximately 186,295, or 88.6%, of those customers enrolled in the SOP. In
18 addition, since the SOP Web Self Service option became available June 1, 2015,
19 approximately 1,657 other customers have elected SOP.⁴ As a result, the SOP is the
20 primary way in which PPL's residential customers are served by an EGS. Participating

³ The SOP was approved as presented in a Partial Settlement. See, Opinion and Order, Docket No. P-2014-2417907 (Order Entered January 15, 2015).

⁴ Direct Testimony of James L. Rouland, PPL Statement No. 1, at 38.

1 EGSs pay \$28 per enrollment and PPL pays \$28 per enrollment to PPL Solutions⁵ and
2 has not incurred any significant additional costs for this program that are imposed on
3 other ratepayers.⁶ On Track (CAP) customers are eligible for shopping generally and are
4 solicited for enrollment in the SOP in the same manner as other customers.

5 Q. PLEASE DESCRIBE PPL'S DISCLOSURES TO ITS CUSTOMERS TO SOLICIT
6 INTEREST IN THE SOP.

7 A. PPL's customer service representatives state, "I see you are eligible to participate in a
8 standard offer program for a 7% discount on the generation portion of your bill. Would
9 you like to hear more?" If the customer answers "yes," the customer is told that the call
10 will be transferred to a "specialist." Once the call is transferred to PPL Solutions, the
11 customer is asked if they want to hear more about the Standard Offer Program. If the
12 customer agrees, the PPL Solutions agent informs the customer that "the actual
13 generation of the electric you receive can be provided by PPL Electric or a participating
14 supplier of your choice. I can offer you PPL Electric's rate of [current PTC] or the
15 standard offer rate of [], which is a 7% discount from the PPL Electric rate and will be
16 in effect for 12 months. This 7% discount is based on PPL's current rate. PPL's current
17 rate can change semiannually on June 1st and December 1st and your savings can vary as
18 PPL's rate changes. The standard offer rate may be higher or lower than PPL's rate when
19 the semiannual changes occur." If the customer expresses interest in this offer, the PPL
20 Solutions agent offers the customer to choose a specific EGS participating in the program

⁵ PPL Solutions is a wholly owned subsidiary of PPL Corporation, PPL Electric's parent company. PPL Response to I&E-18.

⁶ PPL Response to OCA-I-3. Since September 2014 there have not been any costs incurred for this program charged to ratepayers.

1 or one can be selected randomly. The PPL Solutions agent then tells the customer that
2 the selected EGS will send “information from them to confirm your enrollment.” And,
3 the customer is informed that, “You will be able to select a different supplier at any time
4 during or after that 12 month period and there will be no cancellation fee for doing so.”⁷

5 Q. PLEASE DESCRIBE THE DISCLOSURES ASSOCIATED WITH PPL’S WEB-
6 BASED ENROLLMENT IN THE SOP.

7 A. The web-based information is similar to the scripts used by PPL Solutions and quoted
8 above with several additions:⁸

9 • With regard to contract renewal, PPL states, “Customers will receive contract
10 renewal notices from their Standard Offer supplier prior to the end of the 12-month
11 period. At that time, they can remain with their current supplier, switch to another
12 competitive supplier or return to PPL’s Price to Compare in effect at that time. If
13 customers fail to select on one of these options, they will automatically remain with their
14 current supplier on a month-to-month basis on terms and conditions established by that
15 supplier. Customers should read the contract disclosure statement from their supplier to
16 find out what happens after the contract expires.”

17 • Furthermore, the web-based materials will inform the specific customer who
18 seeks further information about the SOP as to whether their current EGS (if the customer
19 is already enrolled with an EGS) is participating in the SOP. The customer is informed
20 that they have the option to enroll with an EGS participating in the SOP to receive the
21 new 12-month fixed price contract with a rate at 7% less than the current PTC. The

⁷ PPL Response to OCA-I-4, Attachment 1.

⁸ PPL Response to OCA-I-8, Attachment 1.

1 customer is informed of the potential of cancellation fees with their current supplier.

2 Q. HAS PPL DEVELOPED ADDITIONAL TRAINING OR BACKGROUND
3 MATERIALS FOR PPL SOLUTIONS WITH REGARD TO THE SOP?

4 A. Apparently not. PPL has stated that there are no “training materials” other than the
5 scripts.⁹

6 Q. HOW MANY EGSs HAVE ENROLLED IN THE SOP WITH PPL?

7 A. An EGS can enroll or ask to be removed from the program on a quarterly basis. The
8 number of EGSs that have been approved by PPL to participate in the SOP has varied,
9 from 3 in August 2013, 6 in September-November 2013, 12 in December 2013-February
10 2014, 9 in March-May 2014, 5 in June-August 2014, 11 in September-November 2014, 9
11 in December 2014-February 2015, with an increased participation of 12-15 EGSs from
12 March 2015 through May 2016.¹⁰

13 Q. DOES PPL ALLOW A CUSTOMER TO CALL AND CHANGE THEIR SOP
14 ENROLLMENT DURING THE 12-MONTH AGREEMENT TERM?

15 A. Yes. Apparently after enrolling with an EGS pursuant to the SOP, some customers have
16 called PPL and asked to “re-enroll” in the SOP during their 12-month SOP agreement.
17 PPL does not keep track of how many customers have initiated such “re-enrollments,”
18 but allows these customers to “re-enroll” which would allow the customer to get a new
19 12-month fixed price agreement based on the current SOP rate.¹¹ PPL has not
20 investigated the reasons why customers seek to make this change.

⁹ PPL Response to OCA-I-4.

¹⁰ PPL Response to OCA-I-1, Attachment 2.

¹¹ PPL Response to RESA-I-8.

1 Q. ARE MOST ENROLLMENTS IN THE SOP BY RESIDENTIAL CUSTOMERS?

2 A. Yes. While small commercial customers are eligible for the SOP, they enroll at the rate
3 of 200-300 per month.¹² As a result, the vast majority of enrollments are by residential
4 customers.

5 Q. HOW MANY CAP CUSTOMERS HAVE ENROLLED WITH AN EGS THROUGH
6 THE SOP?

7 A. PPL does not track this information by month, but the total number of On Track or CAP
8 customers who have enrolled with an EGS through the SOP since the start of the program
9 in August 2013 is 7,607.¹³

10 Q. HAS PPL UNDERTAKEN ANY STUDY OR ANALYSIS OF ITS CUSTOMERS
11 PARTICIPATING IN THE SOP AS IT RELATES TO IMPACTS ON CUSTOMER
12 BILLS OR OTHER CUSTOMER EXPERIENCES?

13 A. PPL has not undertaken any study, survey, or analysis of the program other than its
14 compilation of information on participation rates.¹⁴ As a result, PPL does not know how
15 many customers have cancelled their SOP contracts prior to the 12-month term¹⁵ or the
16 actual customer bill impacts associated with enrollment via the SOP as compared to
17 PPL's PTC rate during the 12-month customer contract term. PPL's information
18 concerning the customer bill impacts of CAP or OnTrack customers who have selected
19 an EGS does not differentiate between those who enrolled directly with an EGS and those

¹² PPL Response to OSBA-I-10.

¹³ PPL Response to OCA-I-1, Attachment 2.

¹⁴ PPL Response to OCA-I-10.

¹⁵ PPL Response to OCA-I-12.

1 who have enrolled via the SOP.¹⁶

2 Q. DID PPL CHANGE ITS CUSTOMER SERVICE REPRESENTATIVE SCRIPTS AND
3 WRITTEN MATERIALS TO REFLECT THE DISCLOSURES REQUIRED IN THE
4 2014 SETTLEMENT?

5 A. PPL changed the scripts used by PPL Solutions, but PPL's customer service
6 representatives do not provide any substantive information about this program to
7 customers before transferring them to PPL Solutions. So, while the PPL Solutions scripts
8 were changed to reflect the modifications of the disclosures as reflected in the DSP III
9 settlement that was approved by the Commission in its January 2015 Order, PPL's
10 customer service representatives still present the program as a 7% reduction in the
11 generation portion of the bill.

12 Q. WHAT BILL IMPACTS HAVE RESIDENTIAL CUSTOMERS EXPERIENCED AS A
13 RESULT OF ENROLLING IN THE STANDARD OFFER PROGRAM?

14 A. At the time of my analysis of the SOP in the DSP III proceeding, SOP customers who
15 enrolled starting in August 2013 had experienced a discount that retained its benefit in
16 terms of being lower than the PTC through June 2014. This trend continued during the
17 rest of 2014 and most of 2015 in that customers who enrolled in the SOP experienced a
18 savings of 7% or more because the PTC rate routinely exceeded the SOP rate during the
19 term of the contract. However, in December 2015 PPL's PTC rate dropped significantly
20 from 9.493 cents per kWh to 7.878 cents per kWh or almost 17%. As a result, customers
21 who had enrolled in the SOP prior to that date and who were given a contract rate of

¹⁶ PPL Response to OCA-1-16.

1 8.88987 cents per kWh in March-May 2015 and 8.82849 cents per Kwh in June-
2 November 2015 paid one cent per kWh or more than the PTC starting in December
3 2015.¹⁷ I am particularly concerned about customers who enrolled in this program in
4 November 2015 with a SOP rate of 8.82849 cents per kWh followed by a significant
5 reduction in the PTC to 7.878 cents per kWh in December 2015 and then a PTC rate of
6 7.918 cents per kWh in January 2016. These customers lost the full value of their initial
7 7% discount and will pay more than the PTC only one month after enrolling in the
8 program..

9 **IV. RECOMMENDATIONS AND REFORMS FOR THE STANDARD OFFER** 10 **CUSTOMER REFERRAL PROGRAM**

11
12 Q. DO YOU AGREE THAT THE SOP SHOULD CONTINUE DURING THE 2017-2021
13 DSP?

14 A. Yes, but my recommendation is tempered with certain reforms and conditions that the
15 Commission should impose concerning the continuation of PPL's SOP. As a preliminary
16 matter, my recommendation primarily reflects the fact that PPL's costs for this program
17 are recovered in EGS charges. That trend should be mandated to continue so that
18 ratepayers are not required to fund any costs for this Program. The purpose of this
19 program was to expose customers to customer choice and stimulate customer interest in
20 choosing an electric supplier and the program has accomplished that objective without
21 any adverse impact on ratepayers generally. Participating EGSs have received a
22 significant benefit from this program, referring particularly to avoided costs incurred by

¹⁷ PPL Response to OCA-I-1, Attachment 2.

1 the EGS to market and solicit enrollments by customers, as well as the benefit that the
2 EGS has the right to retain the customer after the 12-month SOP contract without their
3 affirmative consent.¹⁸ The current trend that requires the participating EGSs to pay for
4 the incremental costs of the program should continue.

5 Q. PLEASE DESCRIBE THE CONSUMER PROTECTIONS ASSOCIATED WITH A
6 CUSTOMER'S DIRECT ENROLLMENT WITH AN EGS COMPARED WITH AN
7 ENROLLMENT PURSUANT TO THE SOP.

8 A. Under this program PPL is enrolling a customer with an EGS. There is no third party
9 verification script or evidence as would be required for an EGS that signed up a customer
10 on the phone or at the customer's door. There are no written marketing materials or other
11 written disclosures given to the customer by PPL as part of this program. The entire
12 enrollment process is a one-sentence introduction by PPL, followed by a relatively short
13 interaction with an agent¹⁹ that is clearly described as a "specialist" by PPL so that the
14 customer is likely to assume that the program and the program terms have the imprimatur
15 of PPL. As a result, the customer's enrollment process with an EGS via the SOP is a

¹⁸ The New York Public Service Commission ordered that its referral programs be halted in February 2014, stating, "These programs facilitate customer enrollment by allowing ESCOs to avoid marketing, verification and enrollment costs. When these programs were established, they were explicitly conceived of as an interim, near-term strategy to expand the market. The programs appear to have outlived their usefulness. In the nine years since the programs were approved they have facilitated customer migration to ESCOs. However, we have found that the vast majority of mass market ESCO customers experience higher bills than they would have as full service utility customers and the programs have provided little or no competitive pressure or other value-added benefits to these retail markets. Under these circumstances, we will not continue to endorse these referral programs, which, as structured, create an expectation that the customer will save money in comparison to what they would have paid the utility. Accordingly, utilities should cease their ESCO referral programs within 60 days of issuance of this Order." *Order Taking Actions To Improve The Residential And Small Nonresidential Retail Access Markets*, Case 12-M-0476 (February 25, 2014), at 21.

¹⁹ According to PPL, the average duration for a customer call related to SOP by PPL Solutions is 3.5 minutes. PPL Response to I&E-19 (D).

1 very different and more casual experience than if the customer enrolled directly with an
2 EGS. Any EGS that conducts a telemarketing call to a prospective customer in
3 Pennsylvania must provide accurate and full disclosures about its terms and conditions
4 and conduct a verification call that includes the following information:

5 52 Pa. Code Sec. 111.12 Consumer Protection.

6 ***

7 (d) A supplier:

8 (1) May not engage in misleading or deceptive conduct as defined by State or
9 Federal law, or by Commission rule, regulation or order.

10 (2) May not make false or misleading representations including
11 misrepresenting rates or savings offered by the supplier.

12 (3) Shall provide the customer with written information about the products and
13 services being offered, or with instructions for where the information can be
14 obtained.

15 (4) Shall provide accurate and timely information about services and products
16 being offered. Information includes rates being offered, contract terms, early
17 termination fees and right of cancellation and rescission.

18 (5) Shall ensure that product or service offerings made by a supplier contain
19 information, verbally or written, in plain language designed to be understood by
20 the customer. This includes providing written information to the customer in a
21 language which the supplier's representative has had substantive discussions with
22 the customer or in which a contract is negotiated.

23 52 Pa. Code § 111.7. Customer authorization to transfer account; transaction;
24 verification; documentation.

25 ***

26
27 (2) The verification process shall be separate from the transaction process and
28 initiated only after the transaction has been finalized. When verifying a
29 transaction that resulted from an agent's contact with a customer at the customer's
30 residence, the verification process shall be initiated only after the agent has
31 physically exited the customer's residence, unless the customer agrees that the
32 agent may remain in the vicinity of the customer during the verification process.

1 Prior to initiating the verification process, the agent shall inform the customer that
2 the agent may not be in the vicinity during the verification unless the customer
3 agrees to the agent's presence.

4 (3) A customer shall be informed of the 3-business-day right of rescission of
5 the transaction under § § 54.5(d) and 62.75(d) (relating to disclosure statement
6 for residential and small business customers) and the customer's rights under
7 section 7 of the Unfair Trade Practices and Consumer Protection Law (73 P. S.
8 § 201-7) at the end of the verification process contact.

9 (4) A supplier shall maintain a record of a verification in a system that is
10 capable of retrieving the record by customer name and customer account number
11 for a period of time equivalent to at least six billing cycles to enable compliance
12 with § 57.177 (relating to customer dispute procedures) for an EGS and § 59.97
13 (relating to customer dispute procedures) for an NGS.

14 (5) The verification record must include the transaction documents and the
15 following information:

16 (i) The date that the transaction was completed.

17 (ii) The name or identification number of the agent that completed the
18 transaction.

19 (iii) The date of the verification.

20 (iv) The name or identification number of the individual that conducted the
21 verification.

22 (v) The results of the verification.

23 (vi) The date that the disclosure statement was provided to the customer and
24 the method by which it was provided.

25 (6) A supplier shall provide copies of verification records to the Commission
26 upon request.

27 Q. PLEASE DESCRIBE THE REFORMS AND CONDITIONS YOU RECOMMEND
28 FOR THE CONTINUATION OF THE SOP DURING DSP IV.

29 A. My first recommendation is that PPL should change the way in which PPL's customer
30 service representatives introduce this program to customers. I am concerned that PPL's

1 presentation of this program to customers emphasizes a program that will provide a “7%
2 discount on the generation portion of your bill.” This statement does not refer to the
3 primary purpose of the program to select an EGS. The statement makes it appear that the
4 customer is being offered a program that is implemented by PPL and not related to the
5 customer’s selection of an EGS other than PPL for their generation supply service.
6 Furthermore, the reference to the 7% discount in the one-sentence introduction to this
7 program by PPL’s customer service representatives does not properly reflect the
8 relationship of this 7% discount to the PTC over the period of the program. It is clear
9 that this program should not be promoted as one with “potential savings” since that is not
10 a pricing provision that is reflected in the EGS terms and conditions. While I agree that
11 the PPL Solutions agent provides additional and more correct details about this program,
12 I recommend several important reforms that should be implemented by PPL and its third
13 party agent. My primary recommendation in this regard is to eliminate any reference to a
14 7% discount in presenting this program to customers. The 7% discount is only relevant
15 when calculating the fixed price offer being presented to the customer and has no
16 relevance to the ongoing price paid by the customer, particularly in light of the PTC
17 changes. Furthermore, I recommend that PPL initially inform customers that this
18 program is a means to introduce customers to selecting an EGS in a more upfront
19 manner.

20 Prior to transferring a customer to PPL Solutions, PPL should affirmatively
21 inform customers:

- 22 • The customer can select or retain default service and refrain from any suggestion
23 that the customer must or should select an EGS;

- 1 • PPL is offering a means to introduce a customer to being served by an EGS with
2 an fixed rate contract for 12 billing cycles;
- 3 • The fixed rate will be slightly less than the current default service or Price to
4 Compare as stated on the customer's bill;
- 5 • The EGS price will not change for 12 months, but the PTC will change
6 semiannually in June and December and, therefore, the PTC may be higher or lower than
7 the fixed rate EGS price; and.
- 8 • The customer can return to default service without penalty at any time or select
9 another EGS without penalty during this 12-month period.

10 Q. WHAT ADDITIONAL OBLIGATIONS SHOULD BE IMPOSED ON PPL'S THIRD
11 PARTY AGENT THAT EXPLAINS THIS PROGRAM?

12 A. PPL Solutions already provides accurate statements about the program, and should be
13 prepared to repeat and explain further the above recommended disclosures. PPL
14 Solutions should take care to eliminate any statement or training materials that appear to
15 promise savings or lower prices with this or any other program in which the customer is
16 solicited to consider selecting an EGS. Further, PPL's agents (similar to PPL's web
17 presentation of the SOP) should be required to inform the customer that the EGS has the
18 right to send a notice of renewal of this agreement shortly before the end of the 12-month
19 period and make offers to the customer, but under Pennsylvania regulations the EGS can
20 retain the customer under a month-to-month contract with a fixed price if the customer
21 fails to respond to any renewal notice.

22 Q. DO YOU HAVE ANY FURTHER RECOMMENDATIONS FOR EVALUATING THE
23 STANDARD OFFER PROGRAM?

1 A. Yes. I recommend that PPL conduct a relatively simple survey and/or focus group of
 2 customers participating in this program and seek to gain information about customers’
 3 understanding of the program, the nature of the 7% discount (as it has been presented
 4 since the program’s inception), whether the customers understood that the PTC would
 5 change and impact the level of savings during the term of the contract, and their
 6 awareness of the comparison of the EGS price and the PTC during the term of the
 7 contract. This information would be very valuable for the evaluation of the Referral
 8 Program and a determination of whether it would be appropriate to continue beyond 2021
 9 and, if so, under what change in terms or reforms to respond to customer participation
 10 experiences.

11 Q. SHOULD PPL’S SOP INCLUDE A SUNSET DATE TO ENSURE THAT THESE
 12 REFORMS HAVE BEEN PROPERLY IMPLEMENTED?

13 A. Yes. I recommend that if these conditions are met, the Program should be allowed to
 14 continue until May 31, 2021. The program should be terminated at that time unless the
 15 Company has made an affirmative filing with the Commission, with opportunity for
 16 public notice and participation, to review whether this program is necessary, these
 17 recommended cost allocation and disclosure reforms have been implemented and with
 18 what results, and the survey and research I have identified as necessary is available to
 19 determine customer understanding and impacts.

20 **V. THE MAJORITY OF PPL’S ON TRACK CUSTOMERS HAVE SUFFERED**
 21 **HIGHER BILLS WHEN SHOPPING WITH AN EGS**

22 Q. HAS PPL UNDERTAKEN AN ANALYSIS OF THE BILL IMPACTS OF SELECTING
 23

1 AN EGS BY ONTRACK CUSTOMERS?

2 A. Yes. Michael Wukitsch presented testimony on behalf of PPL that describes the bill
3 impacts when these customers select an EGS as compared to obtaining generation supply
4 from PPL as default service customers. The percentage of OnTrack customers who have
5 chosen an EGS has increased from 46% in 2013 to 52% in 2015.²⁰ From January 2013
6 through October 2015, 55% of these customers served by an EGS were paying above the
7 PTC. These higher prices resulted in an average monthly energy charge \$31 higher each
8 month than they would have paid under the applicable PTC and a total average monthly
9 increase of \$3.5 million in OnTrack customer bills when this information is extrapolated
10 to 12 months.²¹ Mr. Wukitsch also stated that the net financial impact of OnTrack
11 shopping is an increase of approximately \$2.7 million annually in the generation supply
12 charges for these customers.²²

13 Q. DID PPL'S ANALYSIS OF ITS ONTRACK CUSTOMERS INCLUDE THOSE WHO
14 ENROLLED WITH AN EGS IN THE STANDARD OFFER PROGRAM?

15 A. Yes. Since most of the 7,607 CAP customers who enrolled with an EGS through the
16 SOP actually did save 7% or more during their SOP contracts in 2014 and most of 2015,
17 the impact of the EGS enrollments not associated with the SOP and who charged higher
18 prices compared to the PTC in Mr. Wukitsch's analysis is probably even more significant
19 because the SOP customers typically did see savings during the period of his analysis.

²⁰ Direct Testimony of Michael Wukitsch, PPL Statement No. 3, at 7.

²¹ Ibid., at 9. The \$3.5 million refers to the total generation supply charges that shopping OnTrack customers paid above the PTC.

²² Ibid., at 12. The \$2.7 million refers to the total net generation supply charges that shopping OnTrack customers paid (net of the OnTrack customers who paid above the PTC and those customers who paid at or below the PTC).

1 Although, Mr. Wukitsch's analysis did not include the impact of those CAP customers
2 who enrolled in mid to late 2015 who experienced higher EGS prices under their SOP
3 contracts compared to the PTC starting in December 2015 as I described above.

4 Q. IN ADDITION TO THE ADVERSE IMPACTS ON THE CAP CUSTOMER BILLS,
5 DO THESE INCREASED CHARGES BY EGSs COMPARED TO THE PTC IMPACT
6 OTHER RATEPAYERS?

7 A. Yes. These higher bills for CAP customers result in higher program costs that are
8 included in the rates paid by other residential customers.

9 Q. DO THESE HIGHER CHARGES FOR CAP CUSTOMERS IMPACT THEIR ABILITY
10 TO OBTAIN AND MAINTAIN ESSENTIAL ELECTRIC SERVICE?

11 A. Yes. These customers suffer the potential for failure to pay their monthly OnTrack bill,
12 resulting in credit and collection actions, termination of service, and possible elimination
13 from the OnTrack program. These costs are also reflected in rates paid by other
14 residential customers.

15 Q. WHAT DOES PPL RECOMMEND IN LIGHT OF THIS INFORMATION?

16 A. Based on the testimony of Mr. Wukitsch, Mr. Rouland, on behalf of PPL, recommends
17 that "some limits on CAP shopping should be developed" and that it is an issue of
18 statewide importance. He recommends a statewide collaborative or a rulemaking to
19 address these concerns and issues. However, Mr. Rouland also rejects any proposal that
20 would require PPL to be in the position of "actively monitoring, policing, and ultimately
21 enforcing the terms and conditions between EGSs and CAP customers."²³

22 Q. DO YOU AGREE WITH MR. ROULAND?

²³ Direct Testimony of James Rouland, PPL Statement No. 1, at 46.

1 A. No. I do not agree with the suggestion that this issue that reflects PPL’s OnTrack
 2 program design should necessarily be resolved in the context of a statewide collaborative.
 3 Rather, I recommend that steps be taken in this proceeding to establish reforms and the
 4 timetable for the implementation of reforms prior to the implementation of DSP IV or
 5 June 1, 2017.

6 Q. WHAT DO YOU RECOMMEND WITH REGARD TO THE SOP?

7 A. I recommend that OnTrack customers be assured of consumer protections in PPL’s
 8 Standard Offer Program. The most vital criterion for any program reform must be to
 9 ensure that OnTrack customers do not pay more for essential electric service than what
 10 PPL would charge for default service. The risk to the OnTrack customers and other
 11 ratepayers simply outweighs any theoretical benefit for “customer choice.” My
 12 recommendation is applicable to the SOP because there is no enforceable promise that
 13 the fixed price agreement will save customers compared to the PTC over the 12-month
 14 term of the contract.²⁴ This recommendation can be an additional requirement for EGSs
 15 participating in the SOP and implemented in the same manner as other conditions and
 16 program rules applicable to EGSs that agree to participate in PPL’s SOP.

17 Q. ARE THERE OTHER POTENTIAL POLICIES THAT PPL SHOULD CONSIDER TO
 18 ENSURE THAT CAP CUSTOMERS HAVE AFFORDABLE ELECTRIC SERVICE?

19 A. Yes. It is possible that PPL can implement a program rule that EGSs who seek to serve
 20 CAP customers, if at all, must do so at a rate that is at or below the applicable PTC. This
 21 approach would not require PPL to monitor EGS terms and conditions or be responsible

²⁴ I recognize that SOP customers actually did save compared to the PTC during 2014 and early 2015, but this is not a given in the program design and the loss of that discount and the obligation to pay more than the PTC that took effect in December 2015 when a lower PTC went into effect is an example of this concern.

1 for enforcing the terms of EGS contracts. PPL could establish a shopping program for
2 CAP customers similar to the SOP where approved EGSs are authorized to make offers
3 to CAP customers. Alternatively, since PPL bills and collects for EGSs, it could notify
4 the EGS and the customer when a price is charged that is higher than the PTC. I agree
5 that any such program rule should be enforced by the Commission and not PPL if the
6 EGS refuses to take the necessary step to either drop the customer and return the
7 customer to default service or lower its price to the CAP customer. Another option is to
8 alter the program rules for the Purchase of Receivables program to ensure that PPL will
9 only take collection action for any amount that is equal to or less than what would be
10 charged pursuant to the PTC and return otherwise remaining unpaid bill amounts to the
11 EGS. This latter proposal would allow EGSs to bill more than the PTC, but prevent
12 adverse collection action for those customers who do not pay in full.

13 Q. HOW SHOULD THE ACTUAL PROGRAM RULES DESIGNED TO PROTECT CAP
14 CUSTOMERS BE RESOLVED?

15 A. I recommend that a stakeholder process be ordered with the clearly stated purpose of
16 developing a program to protect CAP customers from unaffordable bills, and ratepayers
17 from increased program costs due to higher EGS charges. This program should be
18 mandated for implementation by June 1, 2017.

19 Q. DOES THIS COMPLETE YOUR TESTIMONY AT THIS TIME?

20 A. Yes.

21

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
For Approval of a Default Service Program : Docket No. P-2015-2526627
And Procurement Plan for the Period :
June 1, 2017 through May 31, 2021 :

EXHIBIT ACCOMPANYING THE
DIRECT TESTIMONY

OF

BARBARA R. ALEXANDER

Consumer Affairs Consultant

ON BEHALF OF THE
PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

April 20, 2016

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Recent Clients:

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Pennsylvania Office of Consumer Advocate
Washington Public Counsel (Attorney General)
The Energy Project (Washington)
Delaware Division of Public Advocate
Maryland Office of People's Counsel
Citizens' Utility Board (Illinois)
The Utility Reform Network (TURN) (California)
Oak Ridge National Laboratory, Department of Energy
COPE No. 378 (British Columbia, Canada)
The Public Utility Project of New York
Massachusetts Ratepayer Advocate (Attorney General)

Areas of Expertise:

- Default Service, Consumer Protection, Service Quality, and Universal Service policies and programs associated with the move to competition in the electric, natural gas, and telecommunications industries;
- Consumer Protection and Service Quality policies and programs associated with the regulation of competitive energy and telecommunications providers;
- The regulatory policies associated with the regulation of Credit, Collection, Consumer Protection, Low Income, and Service Quality programs and policies for public utilities;
- Rate design and pricing policies applicable to residential customers; and
- Advanced Metering Infrastructure costs and benefits and associated time-based pricing proposals.

Prior Employment

DIRECTOR

1986-96

*Consumer Assistance Division
Maine Public Utilities Commission*

Augusta, Maine

One of five division directors appointed by a three-member regulatory commission and part of commission management team. Direct supervision of 10 employees, oversight of public utility consumer complaint function, appearance as an expert witness on customer services, consumer protection, service quality and low income policy issues before the PUC. Chair, NARUC Staff Subcommittee on Consumer Affairs.

SUPERINTENDENT

1979-83

*Bureau of Consumer Credit Protection
Department of Professional and Financial Regulation*

Augusta, Maine

Director of an independent regulatory agency charged with the implementation of Maine Consumer Credit Code and Truth in Lending Act. Investigations and audits of financial institutions and retail creditors, enforcement activities, testimony before Maine Legislature and U.S. Congress.

Education

JURIS DOCTOR

1973-76

University of Maine School of Law

Portland, Maine

Admitted to the Bar of the State of Maine, September 1976. Currently registered as "inactive."

B.A. (WITH DISTINCTION) IN POLITICAL SCIENCE
University of Michigan

1964-68

Ann Arbor, Michigan

Publications and Testimony

“How to Construct a Service Quality Index in Performance-Based Ratemaking”, The Electricity Journal, April, 1996

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Certain Amendments to Illinois Administrative Code Part 280, Docket No. 06-0379 (May and September 2006).
[Consumer Protection rules]

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Direct and Rebuttal Testimony on behalf of the Maryland Office of People's Counsel before the Maryland PSC, In The Competitive Selection of Electricity Supplier/Standard Offer or Default Service for Investor-Owned Utility Small Commercial Customers and, Delmarva Power and Light and Potomac Electric Power Residential Customers, Case No. 9064 (August and September 2006). [Default Service policies]

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Comments on behalf of AARP District of Columbia before the District of Columbia PSC, In the Matter of the Development and Designation of Standard Offer Service in the District of Columbia, Case No. 1017 (2006). [Default service policies]

Comments on behalf of AARP New Jersey before the New Jersey Board of Public Utilities, In the Matter of the Establishment of a Universal Service Fund Pursuant to Section 12 of the Electric Discount and Energy Competition Act of 1999, Docket No. EX00020091 (August 2006) [Recommendations for USF program changes]

Direct and Rebuttal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC, Joint Application of Equitable Resources, Inc. and the People's Natural Gas Co., d/b/a Dominion Peoples, for Approval of the Transfer of All Stock Rights of the Latter to the Former and for the Approval of the Transfer of All Stock of Hope Gas, Inc., d/b/a/ Dominion Hope to Equitable Resources, Inc., Docket No. A-122250F5000 (September and October 2006). [Customer Service, Service Quality, and Universal Service issues]

Direct Testimony on behalf of Pennsylvania Office of Consumer Advocate before the Pennsylvania PUC, Pennsylvania PUC v. Natural Fuel Gas Distribution Corp., Docket No. R-00061493 (September 2006) [Supplier Purchase of Receivables Program]

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Reply Testimony of Barbara Alexander before the Public Service Commission of Maryland, In the Matter of the Investigation into the Marketing, Advertising and Trade Practices of Major Energy Electric Services, LLC and Major Energy Services, LLC, Case No. 9346(b) (March 2015) [unfair and deceptive practices; compliance with MD statutes and regulations for electric generation supplier]

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Direct, Surrebuttal and Supplemental Surrebutal Testimony on behalf of the Pennsylvania Office of Consumer Advocate before the Pennsylvania Public Utility Commission, Commonwealth of Pennsylvania by Attorney General Kathleen Kate, through the Bureau of Consumer Protection and Tanya McCloskey, Acting Consumer Advocate v. Respond Power, Docket No. C-2014-2427659 (May-October 2015) [unfair and deceptive practices; compliance with PA statutes and regulations for electric generation supplier]

Direct Testimony of Barbara Alexander before the Pennsylvania Public Utility Commission, on behalf of the Pennsylvania Office of Consumer Advocate and Bureau of Consumer Protection, Attorney General, Commonwealth of Pennsylvania by Attorney General Kathleen Kate, through the Bureau of Consumer Protection and Tanya McCloskey, Acting Consumer Advocate v. IDT Energy, Inc., Docket No. C-2014-2427657 (April 2015) [unfair and deceptive practices; compliance with PA statutes and regulations for electric generation supplier]

Affidavit of Barbara Alexander before the Pennsylvania Public Utility Commission, on behalf of the Pennsylvania Office of Consumer Advocate and Bureau of Consumer Protection, Attorney General, Commonwealth of Pennsylvania by Attorney General Kathleen Kate, through the Bureau of Consumer Protection and Tanya McCloskey, Acting Consumer Advocate v. Blue Pilot Energy, LLC, Docket No. C-2014- 2427655 (June 2015) [unfair and deceptive practices; compliance with PA statutes and regulations for electric generation supplier]

Direct Testimony of Barbara Alexander before the Pennsylvania Public Utility Commission, on behalf of the Pennsylvania Office of Consumer Advocate and Bureau of Consumer Protection, Attorney General, Commonwealth of Pennsylvania by Attorney General Kathleen Kate, through the Bureau of Consumer Protection and Tanya McCloskey, Acting Consumer Advocate v. Blue Pilot Energy, LLC, Docket No. C-2014- 2427655 (September 2015) [unfair and deceptive practices; compliance with PA statutes and regulations for electric generation supplier]

Alexander, Barbara, "Residential Demand Charges: A Consumer Perspective," presentation for Harvard Electricity Project, June 2015.

Reply Testimony of Barbara Alexander before the Public Service Commission of Maryland, In the Matter of the Investigation into the Marketing, Advertising and Trade Practices of Blue Pilot Energy, Case No. 9346(c) (July 31, 2015) [unfair and deceptive practices; compliance with MD statutes and regulations for electric generation supplier]

Direct Testimony of Barbara Alexander before the Washington Utilities and Transportation Commission, on behalf of Public Counsel and the Energy Project, WUTC v. Avista Utilities, Dockets UE-150204 and UG-150205, (July 2015) [Analysis of request for smart meter (AMI) deployment and business case.]

Alexander, Barbara, "Future Utility Models: A Consumer Perspective," presentation for Kleinman Center for Energy Policy, U. of Pennsylvania, August 2015.

Presentations and Training Programs:

- Presentation on Residential Rate Design, Harvard Electricity Policy Group, Plenary Session, Washington, DC (June 2015)
- Presentation, EUCI Workshop on Demand Rates for Residential Customers, Denver, CO [May 2015]
- Presentation, Smart Grid Future, Brookings Institute, Washington, DC [July 2010]
- Participant, Fair Pricing Conference, Rutgers Business School, New Jersey [April 2010]
- Presentation on Smart Metering, National Regulatory Conference, Williamsburg, VA [May 2010]
- Presentation on Smart Metering, Energy Bar Association Annual Meeting, Washington, DC [November 2009]
- Presentation at Workshop on Smart Grid policies, California PUC [July 2009]
- National Energy Affordability and Energy Conference (NEAUC) Annual Conference
- NARUC annual and regional meetings
- NASUCA annual and regional meetings
- National Community Action Foundation's Annual Energy and Community Economic Development Partnerships Conference
- Testimony and Presentations to State Legislatures: Virginia, New Jersey, Texas, Kentucky, Illinois, and Maine
- Training Programs for State Regulatory Commissions: Pennsylvania, Georgia, Kentucky, Illinois, New Jersey
- DOE-NARUC National Electricity Forum
- AIC Conference on Reliability of Electric Service
- Institute of Public Utilities, MSU (Camp NARUC) [Instructor 1996-2006]
- Training Programs on customer service and service quality regulation for international regulators (India and Brazil) on behalf of Regulatory Assistance Project
- Georgia Natural Gas Deregulation Task Force [December 2001]
- Mid Atlantic Assoc. of Regulatory Utility Commissioners [July 2003]
- Illinois Commerce Commission's Post 2006 Initiative [April 2004]
- Delaware Public Service Commission's Workshop on Standard Offer Service [August 2004]

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :
For Approval of a Default Service Program : Docket Nos. P-2016-2526627
And Procurement Plan for the Period :
June 1, 2017 through May 31, 2021

VERIFICATION

I, Barbara R. Alexander, hereby state that the facts above set forth in my Direct
Testimony, OCA Statement No. 2, are true and correct and that I expect to be able to prove the
same at a hearing held in this matter. I understand that the statements herein are made subject to
the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DocuSigned by:

Signature: 8D0E58CA47E24C2...
Barbara R. Alexander

Consultant Address: 83 Wedgewood Dr.
Winthrop, ME 04364

DATED: April 20, 2016