

Tori L. Giesler, Esq.
(610) 921-6658
(330) 315-9263 (Fax)

610-929-3601

January 17, 2017

VIA UNITED PARCEL SERVICE

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

RECEIVED

JAN 17 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: *PECO Energy Company Pilot Plan for an Advance Payments Program and
Petition for Temporary Waiver of the Commission's Regulations With Respect
To That Plan; Docket No. M-2016-2530484***

Dear Secretary Chiavetta:

On October 26, 2016, PECO Energy Company ("PECO") filed a pilot plan and petition with the Pennsylvania Public Utility Commission ("Commission") seeking authority to implement an advance payment pilot for a select segment of its residential customer class, as well as waivers of certain portions of the Commission's regulations under Chapter 56 (collectively, the "Pilot Plan"). On October 28, 2016, the Commission issued a Secretarial Letter acknowledging receipt of the Petition and setting December 15, 2016 and January 16, 2017 as the due dates for comments and reply comments to respectively be submitted ("October 28 Secretarial Letter"). Notice of the filing and the prescribed deadlines for comment were also published in the Pennsylvania Bulletin on November 12, 2016. Having reviewed the comments filed to date in this matter, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, the "Companies") submit this letter for consideration in accordance with the October 28 Secretarial Letter.

In general, the Companies support PECO's effort to explore the opportunity to provide innovative payment solutions to its customers, including the use of a pilot model from which experience and further information can be obtained. While it may not be appropriate to socialize the details of any such program across all electric distribution companies' ("EDCs") operations in Pennsylvania, the Companies anticipate that the results of the PECO pilot may be helpful in informing any similar programs that they, or their counterpart EDCs, may wish to pursue in the future. Of course, like any other broad scale program, it is also important that EDCs be given the flexibility to determine if and when such a pilot or program is appropriate within their territories and if so, how it should be structured to meet their customers' needs while making operational

January 17, 2017

sense. While the Companies take no position on the details of the Pilot Plan as proposed, it should be underscored that PECO's Pilot Plan outlines an optional opt-in program that is limited to a small segment of its customer base that must qualify based on a set of prescribed criteria, as well as actively and affirmatively seek participation. Those customers, once granted access to the program, may opt out at any time without consequence. Given the flexibility proposed to be offered to participating customers in that regard and the fact that PECO is proposing a pilot as compared to full implementation, the Companies support PECO's request to implement a prepayment pilot, in whatever form results from this proceeding. The Companies further encourage that the results of any such pilot be made available for other EDCs to learn from.

The Companies appreciate the opportunity to provide feedback regarding PECO's Pilot Plan and look forward to the opportunity to further explore this topic. Please date stamp the extra copy of this letter and return it in the postage-prepaid envelope provided.

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

Very truly yours,



Tori L. Giesler

dln
Enclosures

c: As Per Certificate of Service

RECEIVED

JAN 17 2017

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PECO Energy Company Pilot Plan for an :
Advance Payments Program and Petition :
for Temporary Waiver of the : **Docket No. P-2016-2573023**
Commission's Regulations with Respect To :
That Plan :

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, as follows:

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

Lauren M. Burge
Harrison W. Breitman
Office of Consumer Advocate
555 Walnut Street, 5th Floor Forum Place
Harrisburg, PA 17101

Gina Miller
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Ward L. Smith
Richard G. Webster
PECO Energy Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699

Dated: January 17, 2017



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

RECEIVED

JAN 17 2017

Urgent.

This envelope is for use with the following services:

UPS Next Day Air®
UPS Worldwide Express™
UPS 2nd Day Air®

or call 1-800-PICK-UPS® (1-800-742-5877)
pickup or find a drop off location near you.



CMPC

de.

To: CHIAVETA, R. PUC

	UPS Next Day Air® UPS Worldwide Express®
	Shipping Document

WEIGHT	LTR <input checked="" type="checkbox"/>	F <input type="checkbox"/>
--------	-----------------------------------------	----------------------------

Agency PUC
Floor:
External Carrier:

1/18/2017 10:22:09 AM

SATURDAY D



SHIPMENT FROM

UPS ACCOUNT NO. 7522

REFERENCE NUMBER

33001

TELEPHONE

Tom & Gieske 610 421-6665

First Energy

P.O. Box 16001, 2801 Pottsville Pa

Reading, PA 19605

DELIVERY TO

TELEPHONE:

Res may Unavailable, business

Business, please call - Utility Commission

400 North 50th St. Floor

Harrisburg, PA 17101

UPS Next Day Air®

1

J459 049 6170



J459 049 6170

TRACKING NUMBER

DATE OF SHIPMENT

01019120CS 6/14 RFD

United Parcel Service, Louisville, KY

Serving you for more than 100 years
United Parcel Service.

