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File #: 163476

March 10, 2017

***VIA ELECTRONIC FILING***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor North  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2017 through May 31, 2021**  
**Docket No. P-2016-2526627**

Dear Secretary Chiavetta:

Enclosed please find the Petition of PPL Electric Utilities Corporation for Approval to Amend the Implementation Date of the Customer Assistance Program Standard Offer Referral Program in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Michael W. Hassell

MWH/skr  
Enclosure

cc: Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: March 10, 2017

  
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Michael W. Hassell

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :  
Corporation for Approval of a Default : Docket No. P-2016-2526627  
Service Program and Procurement Plan for :  
the Period June 1, 2017 through May 31, :  
2021 :

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**PETITION OF PPL ELECTRIC UTILITIES CORPORATION  
FOR APPROVAL TO AMEND THE IMPLEMENTATION DATE  
OF THE CUSTOMER ASSISTANCE PROGRAM  
STANDARD OFFER REFERRAL PROGRAM**

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TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

Pursuant to 66 Pa.C.S. § 703(g), PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby Petitions the Pennsylvania Public Utility Commission (“Commission”) for expedited approval to amend its fourth Default Service Program and Procurement Plan (“DSP IV Program”) to modify the implementation date of its Customer Assistance Program Standard Offer Referral Program (“CAP-SOP”) from June 1, 2017 to September 1, 2017. As part of PPL Electric’s Commission-approved DSP IV Program, the CAP-SOP is to become effective on June 1, 2017. However, as further explained below, PPL Electric has determined that additional time is required to design, complete, and test the information technology (“IT”) and programmatic changes necessary to implement the CAP-SOP. Therefore, PPL Electric proposes to amend the implementation date for the CAP-SOP from June 1, 2017 to September 1, 2017 in order to have sufficient time to fully complete the system changes necessary to implement the CAP-SOP. In support of this Petition, PPL Electric states as follow:

**I. INTRODUCTION AND BACKGROUND**

1. This Petition is filed by PPL Electric, a public utility subject to the regulatory jurisdiction of the Commission.

2. The Company’s address is PPL Electric Utilities Corporation, Two North Ninth Street, Allentown, Pennsylvania 18101.

3. PPL Electric’s attorneys are:

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4. PPL Electric furnishes electric distribution, transmission and default supply services to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

5. PPL Electric is a “public utility,” an “electric distribution company” (“EDC”) and a “default service provider” as defined in Sections 102 and 2803 of the Pennsylvania Public Utility Code, 66 Pa.C.S. §§ 102, 2803.

6. On January 29, 2016, PPL Electric filed a Petition requesting Commission approval of its proposed DSP IV Program. As part of its filing, PPL Electric also introduced a proposal to mitigate the impacts of shopping by customers enrolled in its Customer Assistance Program (“CAP”).

7. As a result of settlement discussions, the active parties were able to achieve a partial settlement in principle prior to the June 16, 2016 evidentiary hearings. This partial settlement resolved all the issues and concerns raised by the active parties in the proceeding except shopping by customers enrolled in PPL Electric's CAP, which was reserved for litigation.

8. In addition, prior to the June 16, 2016 evidentiary hearing, PPL Electric, the Commission's Bureau of Investigation and Enforcement ("I&E"), the Office of Consumer Advocate ("OCA"), and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") entered into a Joint Litigation Position that: (i) withdrew the three separate CAP shopping proposals originally proposed by PPL Electric, OCA, and CAUSE-PA; and (ii) supported a single revised CAP shopping proposal set forth in PPL Electric's rejoinder testimony, the CAP-SOP. Pertinent to this petition, the Joint Litigation Position proposed that, if adopted by the Commission, the CAP-SOP would become effective June 1, 2017.

9. An evidentiary hearing was held on June 16, 2016. The active parties agreed to waive cross examination, and moved their respective testimonies and exhibits into the record.

10. On July 19, 2016, a Joint Petition for Partial Settlement ("Settlement") was filed to resolve all issues raised in the proceeding, except for the reserved issue of shopping by customers enrolled in PPL Electric's CAP.<sup>1</sup>

11. Certain interested parties submitted initial and reply briefs on the reserved issue of shopping by customers enrolled in PPL Electric's CAP.

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<sup>1</sup> PPL Electric, I&E, OCA, the Office of Small Business Advocate ("OSBA"), PP&L Industrial Customer Alliance ("PPLICA"), Retail Energy Supply Association ("RESA"), and Exelon Generation Company, LLC ("ExGen") were Signatory Parties to the Settlement. CAUSE-PA, the Sustainable Energy Fund ("SEF"), NextEra Energy Power Marketing, LLC ("NextEra"), and Noble Americas Energy Solutions LLC ("Noble") were not parties to the Settlement but indicated that they do not object.

12. By Secretarial Letter dated August 17, 2016, the Commission issued the Initial Decision (“ID”) of Administrative Law Judge Susan D. Colwell. Pertinent to the pending Petition, the ID recommended the CAP-SOP shopping proposal be adopted, including the proposed June 1, 2017 effective date.<sup>2</sup>

13. Exceptions to the ID were filed by PPL Electric, RESA, and PPLICA on September 6, 2016. Replies to Exceptions were served by PPL Electric, OCA, I&E, and CAUSE-PA on September 16, 2016.

14. On October 27, 2016, the Commission issued an Opinion and Order in the DSP IV Program proceeding that approved the Settlement and adopted the CAP-SOP jointly proposed by PPL Electric, I&E, OCA, and CAUSE-PA. *See Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2017 through May 31, 2021*, Docket No. P-2016-2526627 (Order entered Oct. 27, 2016) (“*DSP IV Order*”). Pertinent to the pending Petition, the Commission directed that the CAP-SOP become effective June 1, 2017. *See DSP IV Order*, Ordering Paragraph 14.a.

15. On November 14, 2016, RESA filed a Petition for Reconsideration, seeking reconsideration of the Commission’s approval of the CAP-SOP in the *DSP IV Order*. Answers to RESA’s Petition were filed by PPL Electric, I&E, OCA, and CAUSE-PA.

16. By Order entered November 16, 2016, the Commission granted RESA’s Petition for Reconsideration, pending further consideration on the merits.

17. By Order entered January 26, 2017, the Commission denied RESA’s Petition for Reconsideration on the merits.

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<sup>2</sup> The ID recommended that the CAP-SOP be adopted with one modification. Specifically, the ID recommended a third, new option be added when a CAP customer reached the end of their 12-month CAP-SOP contract. Following consideration of the parties’ exceptions, the Commission declined to adopt the ID’s recommended modification to the CAP-SOP.

18. On February 27, 2017, RESA filed a Petition for Review of the Commission's October 27, 2016 and January 26, 2017 Orders, with respect to the Commission's approval of the CAP-SOP. *RESA v. Pa. P.U.C.*, 230 CD 2017. As of the date of the filing of this Petition, RESA has not sought a stay of the implementation of the CAP-SOP.

19. PPL Electric herein proposes to amend the implementation date for the Commission-approved CAP-SOP from June 1, 2017 to September 1, 2017.

## II. PROPOSED AMENDMENT

20. As explained above, the *DSP IV Order* adopted the CAP-SOP to become effective on June 1, 2017.

21. Since the *DSP IV Order* was issued on October 27, 2016, PPL Electric has been evaluating the IT and system changes needed to fully implement the CAP-SOP. Preliminarily, PPL Electric has identified the need to develop significant IT enhancements, including, but not limited to: enrollment and re-enrollment changes; setting up CAP-SOP rates and rejection codes; setting up letter and contact triggers at time of enrollment; identify recertification activity and make necessary changes; system changes to allow for seamless move to work with the CAP-SOP; develop reporting to track CAP customers utilizing CAP-SOP; and develop a mechanism to move customers into CAP-SOP during initial roll out. In addition, PPL Electric will need to work with the electric generation suppliers ("EGSs") participating in the CAP-SOP to set-up Duns numbers and add rate codes and values to distinguish CAP-SOP suppliers from non-CAP suppliers. Based on this evaluation PPL Electric has determined that it is unable to design, complete, and test the IT and system changes necessary to implement the CAP-SOP by June 1, 2017.

22. For these reasons, PPL Electric proposes to amend the implementation date for the CAP-SOP from June 1, 2017 to September 1, 2017. No other changes or modifications to the

CAP-SOP are proposed as part of this Petition, and thus there is no substantive modification to the CAP-SOP approved by the Commission.

23. Within PPL Electric's service territory, CAP customers have always had the ability to either (i) receive default service, or (ii) shop for and receive electric supply from EGSs. During the period between June 1, 2017 and the amended implementation date of September 1, 2017, PPL Electric proposes to maintain the status quo and permit CAP customers to continue to shop. PPL Electric recognizes that this slightly delays the start date for CAP-SOP; however, the additional time to implement the CAP-SOP is appropriate and needed to ensure the program is fully developed and to avoid any unnecessary customer confusion.

24. Delaying the CAP-SOP implementation date from June 1, 2017 to September 1, 2017, will give PPL Electric sufficient time to fully complete the system changes necessary to implement the CAP-SOP, as well as to test and evaluate the CAP-SOP to identify any programmatic issues before it is fully implemented.

25. For these reasons, PPL Electric submits that the proposed amendment of the CAP-SOP implementation date from June 1, 2017 to September 1, 2017 is in the public interest and should be approved.

### **III. NOTICE**

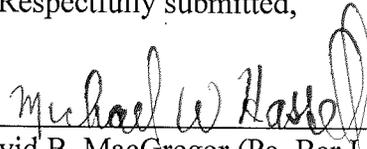
26. A copy of this Petition is being served on all parties to the DSP IV Program proceeding.

27. In addition, PPL Electric has contacted and advised all parties to the DSP IV Program proceeding of the proposed short delay to the CAP-SOP implementation date.

**IV. CONCLUSION**

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission approve the amendment of the implementation date of the Customer Assistance Program Standard Offer Referral Program from June 1, 2017 to September 1, 2017.

Respectfully submitted,



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Dated: March 10, 2017

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