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May 17, 2017

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Leave to Withdraw Its Petition to Amend the Implementation Date of the Customer Assistance Program Standard Offer Referral Program (“CAP-SOP”) Docket No. P-2016-2526627

Dear Secretary Chiavetta:

On May 8, 2017 PPL Electric Utilities Corporation (“PPL”) filed the above referenced petition (“PPL Withdraw Petition”) requesting approval to withdraw its March 10, 2017 petition which sought to amend the implementation date for the CAP-SOP from June 1, 2017 to September 1, 2017 (“PPL Delay Petition”). The Retail Energy Supply Association (“RESA”)¹ filed a letter objecting to the request to withdraw on May 12, 2017 setting forth, *intra alia*, its concerns about the impact of the new CAP shopping restrictions on certain existing customers of electric generation suppliers (“EGS”) who are participants in PPL’s customer assistance program (“CAP”)². In response to these concerns, PPL filed a letter dated May 16, 2017 setting forth its viewpoint that PPL “is not and will not require any suppliers currently serving CAP customers under existing shopping contracts to ‘drop’ their current PPL Electric CAP shopping customers” and that any belief that EGSs are required to terminate existing CAP shopping contracts is “patently false and a complete mischaracterization of the CAP-SOP.”³

RESA’s May 12 Letter and PPL’s response clearly indicate that there is uncertainty in the market about how the new CAP shopping restrictions should be implemented for certain groups of existing EGS customers, namely those on month to month contracts or those whose contracts are scheduled to renew on or after June 1. In its letter PPL appears to be

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

² Specifically, those existing customers who are on month to month contracts or whose contracts would renew on or after June 1.

³ PPL May 16, 2017 letter at 2-3.

taking the view that EGSs are not required to 'drop' these existing CAP customers and return them to PPL's default service. If PPL's assertion is correct and it is the intent of the Commission to not require EGSs to 'drop' these existing CAP customers, then RESA would welcome specific clarity in this regard from the Commission. Additional clarity that EGSs are not required to 'drop' existing customers would serve to address many of RESA's concerns expressed in the May 12 Letter and provide a reasonable opportunity for EGSs to undertake the operational work necessary to comply as existing EGS CAP participant customers would continue to be served under the specific renewal terms in the customer's contract.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Hon. Charles E. Rainey, Jr., Chief Administrative Law Judge w/enc.
Cheryl Walker Davis, Director, Office of Special Assistants (via email only)
Jonathan Nase, Office of Special Assistants (via email only)
Daniel Mumford, Director, Office of Competitive Market Oversight (via email only)
James Mullins, Assistant Counsel, Law Bureau (via email only)
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of RESA's foregoing Letter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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