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July 11, 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:

Please accept this letter in lieu of a more formal answer of the Retail Energy Supply Association (“RESA”)¹ to the petitions for reconsideration filed by the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) and the Office of Consumer Advocate (“OCA”) regarding the Commission’s Order entered June 23, 2017 in this proceeding involving the implementation of restrictions on the ability of PPL’s customer assistance program (“CAP”) participants to shop for alternative competitive supply with an electric generation supplier (“EGS”). In short, while RESA does not seek to exclude the advocates from participating in any future discussions regarding the implementation process, it is critical that EGSs have this opportunity afforded by the Commission to engage in business-to-business discussions – facilitated by the Office of Competitive Market Oversight (“OCMO”) – that are focused on resolving the EGSs’ operational concerns regarding their existing customers (and future customers) who may also be PPL’s CAP participants.

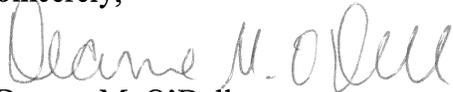
In response to three letters filed by RESA requesting further direction from the Commission about how the new shopping restrictions should be implemented for certain groups of existing EGS customers, the Commission directed that OCMO facilitate a meeting with PPL and the affected EGSs, including RESA, “to examine and resolve any operational issues that are integral

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.

to the implementation” of the shopping restrictions.² In their Petitions, CAUSE-PA and OCA both ask the Commission to permit all parties to participate in these meetings, claiming that the operational issues that must be resolved by PPL and the EGSs can have policy and consumer protection implications in which the advocates are interested.

While RESA did not specifically request that these discussions be limited to PPL and the EGSs, PPL and the EGSs do regularly engage in business-to-business operational discussions without the presence of consumer advocates.³ RESA’s preference would be for the entities that are managing the operations and in control of the customer relationships to be able to meet and focus on operational issues with the leadership of OCMO to guide the discussion.⁴ To be clear, RESA does not seek to exclude the advocates from participating in this process entirely as OCMO can seek their input at any time. However, in RESA’s opinion, the failure to date to resolve these very important operational issues between PPL and the EGSs counsels in favor of ensuring that PPL and the EGSs have this opportunity afforded by the Commission to engage in focused business-to-business discussions intended to resolve the outstanding issues related to EGSs’ existing and future customers who also participate in PPL’s CAP.

Sincerely,



Deanne M. O’Dell

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

² Order at Ordering ¶2, pp. 17-18.

³ In fact, two such meetings have already occurred in which PPL set forth the process that it will utilize for EGSs who wish to voluntarily participate as suppliers in the CAP-SOP program. See RESA letter dated May 12, 2017 at 2-3 which describes the shortcomings (from RESA’s perspective) of the April 25, 2017 meeting between PPL and the EGSs. These meetings have not resolved the continuing uncertainty about how the new shopping restrictions should be implemented for certain groups of existing EGS customers.

⁴ Indeed, since December 2009, OCMO has served as the Commission’s electric retail choice ombudsman, fulfilling the role of resolving informal disputes between default service providers and EGSs. See http://www.puc.pa.gov/utility_industry/electricity/electric_competitive_market_oversight.aspx. See Secretarial Letter, Docket No. M-2009-2082042 (December 10, 2009). No consumer advocate participation is required for such OCMO-facilitated discussions, unless OCMO later determines that such input would be appropriate. OCMO also regularly meets with the EDCs without the presence of other interested stakeholders.

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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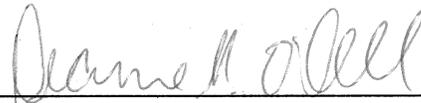
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