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October 22, 2018

Electronic Filing

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

Re: Stakeholder Collaborative and Request for Comments re: FirstEnergy CAP
Shopping Program Implementation and Customer Referral Program Scripting.
Docket Nos.: P-2017-2637855, P-2017-2637857, P-2017-2637858, P-2017-
2637866

Dear Secretary Chiavetta:

Please find enclosed comments of WGL Energy Services, Inc. (“WGL Energy”) in response to the Pennsylvania Public Utility Commission’s (“Commission”) Secretarial Letter dated September 6, 2018, pertaining to the above captioned dockets. WGL Energy submits these comments after the deadline of October 19, 2018, because we erroneously thought the comments were informal and could be sent by email and that filing was not required. WGL Energy respectfully requests the Commission accept WGL Energy’s comments into the record to be included as part of the above captioned dockets.

Please call the undersigned if there are questions regarding this filing.

Respectfully submitted,

Bernice K. McIntyre

Bernice K. McIntyre
Director, Regulatory Strategy

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Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Petition of Metropolitan Edison Company,	P-2017-2637855
Pennsylvania Electric Company, Pennsylvania	P-2017-2637857
Power Company, and West Penn Power Company	P-2017-2637858
For Approval of their Default Service Programs	P-2017-2637866

COMMENTS OF WGL ENERGY SERVICES, INC.

WGL Energy Services, Inc. (“WGL Energy”) hereby files these brief Comments in response to the Commission’s Secretarial Letter dated September 6, 2018. In that Secretarial Letter, the Commission set an informal stakeholder collaborative to be led by the Office of Competitive Market Oversight (OCMO). The workgroup is directed to: (1) address the mechanics and details of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power (collectively “FirstEnergy”) new Customer Assistance Program (CAP), with a recommendation provided to the Commission by the end of January 2019; and (2) that the issue of scripts for the Customer Referral Program (“CRP”) be referred to OCMO to convene and coordinate a group of interested stakeholders for the purpose of collaboratively addressing the scripting and training materials associated with FirstEnergy’s CRP with a recommendation provided to the Commission by the end of January 2019. The Secretarial Letter invited interested stakeholders to submit potential agenda items by October 19, 2018 to be addressed at the November 5, 2018 collaborative meeting.

WGL Energy submits this letter to provide a list of potential topics for the discussion at the November 5, 2018 collaborative meeting, as it pertains to the mechanics of First Energy's new CAP Shopping program. The topic of interest include, and are not limited to, the following: (1) utility notification to EGSs when EGS customers enroll in CAP; (2) timing for EGSs to relinquish CAP customers who are on month-to-month contracts; (3) utility notification to EGSs when their "Dropped" customers exit CAP.

(1) Utility notification to EGSs when EGS customers enroll in CAP

WGL Energy submits that FirstEnergy should be required to send each Electric Generation Supplier ("EGS") a weekly email, or, at least once a month, identifying which existing customers of the supplier have enrolled in CAP during the prior month, so that the supplier can drop the customer at the appropriate time. As the only party with the direct access to that information, FirstEnergy is in the best position to assume the obligation of identifying the appropriate customers who must be "dropped" and notifying the EGSs accordingly. A weekly email will provide EGSs with sufficient time to double check the enrollment status of each identified customer, communicate with FirstEnergy regarding any issues or concerns, and generate the required notice letters in the timeframe required by 52 Pa. Code § 54.10.

(2) Timing for EGSs to relinquish CAP customers who are on month-to-month contracts

WGL Energy proposes allowing 120 days for an EGS to return a month-to-month customer to FirstEnergy default service after that customer enrolls in CAP, or, for existing CAP customers on month-to-month contracts, 120 days after the Order is final.

(3) Utility notification to EGSs when their “Dropped” customers exit CAP

In addition to notifying EGSs when their enrolled customers enter CAP, basic fairness justifies requiring FirstEnergy to notify the EGSs when their customers who were “dropped” upon entry to CAP subsequently leave CAP. If a customer who is enrolled with an EGS on either a fixed term or month-to-month contract subsequently enrolls in CAP and is dropped by the EGS as a result, FirstEnergy should pro-actively notify that EGS when the customer exits CAP. This will give the affected EGS the first opportunity to re-engage with the customer to seek re-enrollment. The customer would not be forced to re-enroll with the EGS. But at least the EGS who was forced to “drop” the customer would have the opportunity to make the first contact with the customer to discuss re-enrollment options with the customer.

Conclusion

WGL Energy believes that the modifications discuss herein are crucial to make FirstEnergy new CAP shopping program workable and fair to EGSs. WGL Energy looks forward to continued engagement with the Commission and other stakeholders on this matter.

Respectfully submitted,

October 22, 2018

Bernice K. McIntyre

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