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July 30, 2019

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

**Re: Electric Distribution Company Default Service Plans –
Customer Assistance Program Shopping
Docket No. M-2018-3006578**

Dear Secretary Chiavetta:

PECO Energy Company's Comments in this docket are attached for filing.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WS/adz
Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ELECTRIC DISTRIBUTION :
COMPANY DEFAULT SERVICE : **DOCKET NO. M-2018-3006578**
PLANS – CUSTOMER ASSISTANCE :
PROGRAM SHOPPING :

COMMENTS OF PECO ENERGY COMPANY

On February 28, 2019, the Pennsylvania Public Utility Commission (the “Commission”) entered an Order in the above-referenced proceeding (the “Order”) seeking comments on the proposed Policy Statement, with such comments to be filed with the Commission 45 days from the date of publication in the Pennsylvania Bulletin. On June 15, 2019, the Order was published in the Pennsylvania Bulletin, 49 Pa. Bull. 3083, thus establishing a due date of July 30, 2019 for filing comments. PECO Energy Company (“PECO” or the “Company”) submits these Comments in accordance with the Order.

The Order (p. 1) “sets guidelines for [Electric Distribution Companies, or “EDCs”] that limit harm to CAP participants while still providing CAP participants the benefits of the retail electric market.” PECO appreciates and supports the efforts of the Commission to establish these guidelines. The Order (p. 5) highlights three aspects of its guidelines, directing that:

In designing CAP shopping programs, EDCs should include the following provisions:

1. A requirement that the CAP shopping product has a rate that is always at or below the EDCs’ PTC(s) over the duration of the contract between the [Electricity Generation Suppliers, or “EGSs”] and the CAP participant.
2. A provision that the contract between the EGS and the CAP participant contains no early termination or cancellation fees.
3. A provision that, at the end of the contract, the CAP participant may re-enroll with the EGS at a product that meets the same requirements as outlined in numbers 1 and 2 above, switch to another EGS offering a product that meets those requirements or be returned to default service.

PECO supports these salient features of the Commission’s guidelines. Indeed, when PECO initially proposed a CAP Shopping Plan for its service territory in May 2013¹, it proposed a similar constraint on the rate EGSs could charge for CAP shopping products² and, in September 2016, PECO revised its proposal to include a prohibition against early cancellation or termination fees.³

The Order (p. 6) provides the following direction regarding the filing of CAP shopping proposals under the Policy Statement:

The mechanics of CAP shopping programs should be addressed by EDC’s in their next default service plan proceedings following adoption of the proposed policy statement, so as not to impact current, Commission-approved programs, and to allow for due process for all parties.

PECO supports this filing procedure for the reasons stated by the Commission and also because this procedure retains flexibility for EDCs to address the needs and constraints of their service territory and systems. Without delving deeply into the mechanics of a future PECO proposal, PECO notes that it is currently able to perform “bill-ready” consolidated billing for EGSs, but does not support “rate-ready” billing functionality; that may in turn affect the manner in which the salient features of the Commission’s Policy Statement can be implemented in PECO’s service territory. The procedure proposed by the Commission will allow such EDC-specific issues to be addressed in the default service plan proceeding that is specific to that EDC.

¹ See Petition of PECO Energy Company for Approval of its Customer Assistance Program Shopping Plan, filed May 1, 2013 in Docket No. P-2012-2283641 (“PECO’s DSP II Proceeding”).

² *Id.*, ¶ 20.

³ See Letter of Richard G. Webster to Secretary Rosemary A. Chiavetta, *Re: PECO’s Customer Assistance Program, Proposed Rule Revision*; Docket No. P-2012-2283641 (Sept. 1, 2016).

CONCLUSION

PECO appreciates the opportunity the Commission has provided to offer these Comments. PECO looks forward to presenting the mechanics of its CAP Shopping proposal in a future default service proceeding as directed by the Commission.

Respectfully submitted,



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