

**Informal Comments  
of Citizens' Electric Company of Lewisburg  
and Wellsboro Electric Company**

**I. INTRODUCTION**

At a Public Meeting held on August 15, 2013, the Commission issued a Joint Motion approving the establishment of Eligible Customer List ("ECL") procedures for the natural gas market, including mandated triennial refreshing of ECLs.<sup>1</sup> The Joint Motion also noted that the Commission's procedures for electric ECLs, as established by the Order entered November 15, 2011, at Docket No. M-2010-2183412 ("Electric ECL Order"), omitted any refresh requirements. To that end, the Commission's Joint Motion also directed the Office of Competitive Market Oversight ("OCMO") to explore routine refreshing of electric ECLs in conjunction with its Committee Handling Activities for Retail Growth in Electricity ("CHARGE").

On January 16, 2014, CHARGE convened a conference call and requested Informal Comments from stakeholders regarding the necessity and appropriateness of routine refreshing of electric ECLs. As longtime CHARGE participants, Citizens' Electric Company of Lewisburg, PA ("Citizens") and Wellsboro Electric Company ("Wellsboro") hereby submit these limited Informal Comments for consideration.

**II. COMMENTS**

The currently effective Electric ECL Order directed Electric Distribution Companies ("EDCs") to conduct a one-time companywide solicitation providing customers with an opportunity to withhold customer information from the ECLs provided to Electric Generation Suppliers ("EGSs"). The Commission's recent Gas ECL Order adopted a similar initial solicitation, but additionally required Natural Gas Distribution Companies ("NGDCs") to

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<sup>1</sup> Following issuance of the Joint Motion, the Commission entered an Order on September 23, 2013, at Docket No. M-2012-2324075 ("Gas ECL Order"), formally adopting specific ECL procedures.

conduct "refresh" solicitations every three years. Any customer failing to affirmatively opt out of the triennial refresh would be included in the respective gas ECL.

Citizens' and Wellsboro have reviewed the Gas ECL Order and agree that applying the three-year refresh procedure to the electric market seems to be a reasonable balance between the goals of providing suppliers with current customer information and reasonably preserving customers' rights to restrict release of customer information. In addition, a three-year refresh would not impose an undue administrative burden on EDCs. While Citizens' and Wellsboro do not oppose adoption of a mandated triennial refresh for electric ECLs at this time, the companies reserve the right to review and address comments submitted by other stakeholders.

Respectfully submitted,

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Dated: February 28, 2014