

FES submits these informal comments in response to OCMO's January 16, 2014 e-mail to CHARGE participants regarding routine refreshing of the Eligible Customer Lists ("ECL") maintained by Pennsylvania electric utilities. OCMO was directed to explore this issue in a Joint Motion of Commissioners Pamela A. Witmer and James H. Cawley following the adoption of a Final Order outlining Interim Guidelines for natural gas distribution companies' ("NGDC") ECLs that included such provisions. (Docket No. M-2012-2324075; Final Order entered September 23, 2013) ("Final Order").

FES notes that most aspects of the electric ECLs were considered at length in developing the Commission's Interim Guidelines for electric ECLs at Docket No. M-2010-2183412. Therefore, any tentative order that follows the informal comments received herein should be limited to the single issue of whether routine refresh guidelines should be adopted for the electric ECLs. It should not be seen as an opportunity to reiterate arguments on other ECL issues that have been resolved.

The NGDC Final Order determined that NGDCs must educate their customers regarding the disclosure options at least annually, create new ECLs every three years by re-soliciting their entire residential and small commercial customer base, and update the ECLs on a monthly basis and post them in a secure area on the companies' websites. Further, the Final Order permits NGDCs to seek cost recovery from residential and small commercial customers for activities associated with the Final Order's ECL requirements. FES does not oppose this same approach for electric ECLs.