PENNSYLVANIA PUBLIC UTILITY COMMISSION Harrisburg, Pennsylvania 17105-3265

Re: Interim Guidelines Regarding Standards For Changing a Customer's Electricity Generation Supplier Public Meeting: November 10, 2011 2270442-DIR Docket M-2011-2270442

STATEMENT OF COMMISSIONER CAWLEY

Before us for consideration are proposed interim guidelines that are intended to facilitate the timely transfer of a customer's account from an electric distribution company (EDC) to a competitive electric generation supplier (EGS or supplier) or from one EGS to another. These proposed guidelines propose to accelerate the process of enrolling a customer with his or her EGS of choice. As part of these changes, the tentative order proposes to require EGSs to advise a customer about the date that the customer's account can be transferred to the EGS. In Pennsylvania, this switching date is currently tied to the customer's individual monthly meter read date. Specifically, it is proposed that the EGS must provide an estimate of the starting date of EGS supply service to the customer in the Disclosure Statement.

It would be helpful if the parties commented on the following issues, in light of these proposed changes:

- 1. How important is it to consumers that they have a good faith estimate of the projected starting date for EGS service in the Disclosure Statement?
- 2. Are there other means or timelines that would more beneficially provide information to customers regarding the service starting date?
- 3. If a customer opts out of the Eligible Customer List (ECL) and the EGS and/or customer does not readily have information on customer specific meter read dates, will this complicate the customer contracting process, and what new processes or EDC information systems can be provided *in real time* to enable effective contracting between EGSs and customers?*
- 4. What is the experience of EGSs with regard to customers having ready access to their billing statements so that EGSs can provide the necessary meter read information to customers during the contracting process? Does the vast majority of customers keep a copy of their bills and/or have a copy available when contracting with an EGS?

November 10, 2011

James H. Cawley Commissioner

^{*} EDI processes usually provide for batch processing that may not be sufficiently responsive to obtaining meter cycle information on a real time base, but instead require twenty-four or more hours in response times.