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May 20, 2013

VIA E-FILING

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

**RE: EDC Customer Account Number Access Mechanism for EGSs;
Docket No. M-2013-2355751**

Dear Secretary Chiavetta:

As directed in the Tentative Order entered April 18, 2013 in the above-captioned proceeding, enclosed for electronic filing are the *Comments of FirstEnergy Solutions Corp.*

Very truly yours,



Amy M. Klodowski
Attorney
FirstEnergy Solutions Corp.

AMK:dml

Enclosures

cc: Dan Mumford
Patricia Wiedt

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDC Customer Account Number)
Access Mechanism for EGSs)

Docket No. M-2013-2355751

**COMMENTS OF
FIRSTENERGY SOLUTIONS CORP.**

FirstEnergy Solutions Corp. (“FES”) respectfully submits these Comments in response to the questions posed by the Pennsylvania Public Utility Commission (“Commission”) in its Tentative Order entered on April 18, 2013 in the above-captioned proceeding. The Tentative Order was issued following a recommendation from the Commission’s Office of Competitive Market Oversight (“OCMO”) to provide for a process by which Electric Generation Suppliers (“EGSs”) would have access to the Electric Distribution Company (“EDC”) account numbers of customers enrolling for EGS service in situations, generally involving sales activities at public venues, where the account numbers are not available from either the customers or from the Eligible Customer List (“ECL”). OCMO’s proposal arose from a meeting it held through the Committee Handling Activities for Retail Growth in Electricity (“CHARGE”) on July 26, 2012, in which the issue was raised of how to facilitate EGS access to EDC customer account numbers in such situations.

In the Tentative Order, the Commission stated that the inability of EGSs to obtain customer account numbers in the context of selling at public venues is a serious impediment to customer shopping. In addition, the Commission found that it is technically possible to provide an automated mechanism to facilitate EGS access to customer account numbers when that number is otherwise unavailable at the time of an in-person enrollment. The Commission invited comments on policy and technical issues involved in the development by EDCs of systems to

enable EGSs to obtain customers' account numbers not otherwise immediately available. In addition, the Commission requested comments on a number of specific questions enumerated in the Tentative Order, which address the various issues involved in implementing the process the Commission envisions. The Commission requested that comments be filed within thirty (30) days of the entry date of the Tentative Order, or by May 20, 2013. FES respectfully submits these Comments in response to the Commission's directive.

I. INTRODUCTION

FES, a subsidiary of FirstEnergy Corp., is experienced in wholesale and retail markets, offering wholesale and retail energy and related products and services to over 2.5 million customers in all customer classes throughout Pennsylvania and five other states. FES has direct knowledge of the challenges EGSs experience when attempting to enroll a customer and an EDC account number is not readily available. In these Comments, FES offers recommendations that it believes will streamline the enrollment process, which will result in greater customer satisfaction with their shopping experience.

FES appreciates this opportunity to file comments regarding the proposal of a critical procedure to help streamline the customer enrollment process and thanks the Commission for its continuing support of the competitive retail markets. FES fully supports the Commission's determination that an EGS's inability to access a customer's account number while conducting a marketing event at a public venue is a significant barrier to the success of the competitive retail electricity market. The best process to use for providing account numbers to EGSs, particularly at public events, is a portable, real-time technology, such as a secure internet-based system, that allows the EGS to look up a customer's account while the customer is still present in order to

correct any account number request deficiencies without delay so that the customer can quickly and easily complete the enrollment application in one step. This level of customer service will eliminate the irritation of repeated customer contacts to complete an enrollment application, reduce a customer's lost savings while the enrollment process is delayed, and ensure a greater level of customer satisfaction with the shopping process, all of which will encourage shopping. In the following section, FES's responses to the questions posed in the Tentative Order will offer specific recommendations as to the best ways to achieve the Commission's goal of enabling EGS access to EDC customer account numbers, while at the same time maintaining the important consumer protections required by Pennsylvania law.

II. RESPONSES TO THE QUESTIONS RAISED IN THE TENTATIVE ORDER

1. EDCs may propose using different technologies to provide account numbers. If so, how much variation among utilities would be too confusing or burdensome upon the suppliers using the systems?

Having to work with numerous EDC technologies would be burdensome for EGSs. FES would have to train its employees how to use each different technology utilized by EDCs. Also, FES would need to evaluate its IT system's compatibility with each different EDC technology. Any necessary training or system modification would have to be evaluated to determine whether the costs are justified by the benefits to be gained. Therefore, it is preferable that the technologies EDCs utilize vary as little as possible.

2. Technologies that have been discussed include the internet, interactive voice response (IVR) telephone and electronic data exchange (EDI). Are some technologies preferable to others and if so, why?

FES strongly prefers a secure internet-based system due to its ease of portability through electronic devices to various event marketing sites. Also, if EDCs implement an automated mechanism for providing account numbers, an internet-based system can provide real-time responsiveness, which will allow EGSs to request account numbers while the customer is still present to complete the enrollment request at the point of contact. This type of real-time interaction will create a more positive customer experience and further encourage electric choice.

EDI technology is a possible alternative to an internet-based system. FES and EDCs already use EDI on a daily basis. However, EDI currently lacks the portability of an internet-based system and would also require more technical training than an internet-based system.

FES strongly recommends against using an IVR telephone system. Like EDI, an IVR system would require additional technical training, but unlike EDI the IVR system tends to have a high error rate and low customer satisfaction because of its difficulty understanding voice commands. In FES's experience, IVR systems routinely misunderstand the pronunciation and/or spelling of surnames and street names, a problem which will be exacerbated in a public setting where there is likely to be a substantial amount of background noise or interference.

3. In providing account numbers, should there be limits on the response time back from the EDC, and if so, should the timeframes be dependent upon the technology being used?

If EDCs use an internet-based mechanism, then the response time should be immediate or nearly so. Real-time responses are a vital component of completing an enrollment request while

providing a positive customer service experience to potential customers who are interested in participating in shopping. The appeal of real-time response capability is a drawback of using an EDI system, unless EDCs are able to automate their EDI processes to accommodate the portability and real-time response requirements noted above so it could be used at marketing events.

4. What specific identifying data should a supplier be required to submit to the EDC to get an account number? At a minimum, should a customer's name and address be required?

A supplier should be required to submit the customer's name, at least partial street address (house number, street name) and zip code when requesting the customer's account number. In addition, optional fields such as a nickname, phone number, middle initial and e-mail address should be available to limit the potential for either "no results" or "multiple hits" responses. It is important to recognize that addresses can be formatted in numerous ways, so the formatting requirements must be clearly specified by the EDC and the use of wildcards must be permitted (see response to Question 5, below).

5. What level of precision is necessary to ensure accurate data?

The requisite level of data precision should be flexible enough to account for variations in names or street addresses, but is also most likely to result in a definitive match. Any technology implemented by the EDC should allow the EGS to utilize wildcards to allow for variations in a customer's name or a street type. For example, in regards to a street type, submitting "Dr*" should search for both "Dr." and "Drive" or in regards to names, submitting "Jo*" should search for both "Joe" and "Joseph."

Also, any data formatting requirements of the technology should be clearly communicated to the EGSs, for example, whether the street type included in an address should always be abbreviated, such as “Blvd” for “Boulevard” or if phone numbers need to be submitted with or without dashes. To avoid excessive information request rejections, the technology used by the EDC should permit separation of data fields such as first name and last name as well as street number and street name, and employ a drop down box for street type (i.e. Street, Avenue, Drive, etc.). FES recognizes that this suggestion may be impracticable if an EDC’s data management system does not support these separate submission fields. To help remedy this problem, all submission fields should allow for wildcards or other data intelligence software to accommodate variations in the account holder’s name or address.

Finally, any “no results” or “multiple hits” responses from the EDC should include a detailed response of why the search was unsuccessful, including the name or address field that caused the search to be unsuccessful. For example, take the case of two customers who are married and living together and are attempting to enroll, but do not know their account number or which spouse is listed as the account holder on the electric bill. If a customer account number request is submitted with the wrong spouse’s name, then a results response should indicate that there were no identical matches, but customer’s last name matches the address. This would immediately allow the EGS to submit another request with the other spouse’s name. For another example, a customer prefers to use his nickname “Bob”, but the electric account is under his formal name, “Robert.” By having the capability to provide this additional information, an EGS will be able to troubleshoot an exact data match with the customer(s) being present to facilitate a faster enrollment process. A successful automated query mechanism should be flexible and provide meaningful results to assist EGSs efficiently accessing a customer’s account number.

6. The amount and recovery of costs could vary by EDC and by the technology used. If there are significant costs, can they be estimated at this time? Who should be responsible for those costs and what mechanisms should be used to assess and collect costs?

EDCs should endeavor to minimize costs by utilizing or modifying existing technology and software, if possible. Creating a mechanism to provide EGSs with efficient, timely access to customer account number provides a benefit to all customers; therefore, the costs of implementing and maintaining the necessary technology should be paid for by all customers through a non-bypassable rider.

7. What safeguards are needed to ensure that account numbers are accurately communicated and provided only to the customer and supplier involved?

Appropriate safeguards can be built into the technology used by the EDCs. For example, password-protected log-ons for an internet-based system will allow the EDC and EGS to track requests and responses for account numbers. In addition, when submitting a request for any customer's account number, EGSs can be required to electronically attest that the account number request is made with the intention of enrolling the customer and it is made with the customer's consent. Furthermore, the EGS's request may be accompanied with an electronic acknowledgement that the EGS has received an executed Letter of Authorization ("LOA") from the customer (which should be valid in either paper or electronic format) and is capable of producing the LOA upon the Commission's request.

In addition, the Commission's regulations at 52 Pa. Code §54.8 protect customers from disclosure of information in the hands of EGSs. The potential penalties for violating the Pennsylvania or the Commission's consumer protection regulations, including license revocation, are sufficient to ensure that customer account numbers (and other private customer

information) are maintained safely by EGSs and are only shared between the customer and the intended supplier.

8. What information and format should be required in an LOA?

FES believes that this issue is best left for discussion among participants in the upcoming LOA working group being formed in response to Issue No. 46A on the CHARGE agenda.

9. Are there possible reporting requirements that should be developed so that the Commission can monitor the effectiveness and security of the systems? This could include things like the total number of account numbers provided and the number of complaints or problems associated with the provision of account numbers under these mechanisms.

As EDCs are developing the technology to provide EGSs with the access to customer account numbers envisioned in this proceeding, various tracking mechanisms can be built into that technology to track pertinent information. EDCs are in the best position to monitor all account number requests and if an automated process is used, accessing this information should require minimal effort. Any tracking mechanism and Commission oversight protects and benefits all customers, and therefore, any additional costs for implementing such a mechanism should be included in the total cost of developing the technology, and paid for by all customers through a non-bypassable rider.

10. What are the appropriate sales channels that would be authorized to use this process?

The proposed process could provide a significant benefit to all customers through several sales channels where a customer may not be able to easily locate his or her EDC account number. Public venue marketing events are the most obvious sales channels that would benefit

from an automated account number retrieval process. However, FES can see such a process being useful in all other sales channels through which customers may attempt to enroll but might not have access to their account numbers, whether because they are not at home or they simply do not retain their electric bills. These other sales channels include telemarketing, mailers or web-based marketing. Any process that removes a significant barrier to enrollment should be broadly applied as to benefit all customers, regardless of those customers' preferred method of enrollment.

11. What process should the EDCs use to develop their solutions, including the level of stakeholder involvement and Commission oversight?

In Pennsylvania, interested stakeholders are accustomed to participating in workshops, such as the Electronic Data Exchange Working Group (EDEWG). Working groups allow for timely, collaborative input from all parties with a vested interest in the topic. Therefore, FES believes utilizing either an existing working group or creating a new working group would be the best forum for stakeholders and EDCs to discuss solutions and concerns regarding the development of technologies that allow EGSs authorized access to customers' account numbers.

12. What are reasonable timeframes for the development and implementation of these systems?

Determining a reasonable timeframe is largely dependent upon the technology being implemented; therefore, until a technology resource is determined, FES has no position on setting such a timeframe.

13. Are there any other concerns, suggestions or questions that the Commission needs to address?

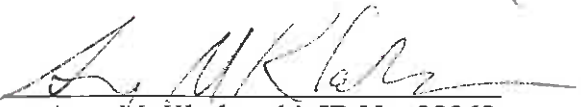
FES has no additional concerns, suggestions, or questions at this time.

III. CONCLUSION

FES believes that the Commission's support of the competitive markets in Pennsylvania has resulted in these markets' significant growth and success. The Commission's support of removing a remaining barrier to successful retail marketing through the process to result from this proceeding will allow Pennsylvania's competitive electric market to continue to thrive. FES appreciates this opportunity to submit these comments and looks forward to participating in the Commission's continued efforts to increase customer shopping across the Commonwealth.

Respectfully submitted,

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