



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166  
Tel: 717.232.8000 • Fax: 717.237.5300

Pamela C. Polacek  
Direct Dial: 717.237.5368  
Direct Fax: 717.260.1736  
ppolacek@mwn.com

May 20, 2013

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

**VIA HAND DELIVERY**

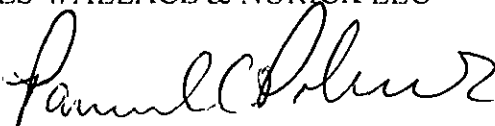
**RE: EDC Customer Account Number Access Mechanism for EGSs;  
Docket No. M-2013-2355751**

Dear Secretary Chiavetta:

Enclosed please find the Comments of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company regarding the above-referenced proceeding.

Sincerely,

McNEES WALLACE & NURICK LLC

By   
Pamela C. Polacek

Counsel to Citizens' Electric Company of Lewisburg, PA  
and Wellsboro Electric Company

PCP/sar

Enclosure

RECEIVED  
2013 MAY 20 PM 4:18  
PA PUC  
SECRETARY'S BUREAU

[www.mwn.com](http://www.mwn.com)

HARRISBURG, PA • LANCASTER, PA • STATE COLLEGE, PA • COLUMBUS, OH • WASHINGTON, DC

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

---

**COMMENTS OF  
CITIZENS' ELECTRIC COMPANY OF LEWISBURG, PA  
AND WELLSBORO ELECTRIC COMPANY**

---

RECEIVED  
2013 MAY 20 PM 4:18  
PA PUC  
SECRETARY'S BUREAU

On April 18, 2013, the Pennsylvania Public Utility Commission ("PUC" or "Commission") issued a Tentative Order in the above-captioned docket regarding a proposal by the Office of Competitive Market Oversight ("OCMO") to provide for procedures that would facilitate access by electric generation suppliers ("EGSs") to electric distribution companies' ("EDCs") account numbers for newly enrolled customers in cases where the account number is not available either from the customer or from the Eligible Customer List ("ECL").<sup>1</sup> In accordance with the Commission's established schedule, Citizens' Electric Company of Lewisburg, PA ("Citizens") and Wellsboro Electric Company ("Wellsboro") (collectively, the "Companies") hereby submit these Comments.

Citizens' and Wellsboro join in, and support, the Comments submitted by the Energy Association of Pennsylvania ("EAP") regarding the Tentative Order. Each EDC should have the flexibility to develop its own procedures to provide EGSs with account numbers for customers that want to switch to the EGS. Larger EDCs may prefer to address such requests through Electronic Data Exchange ("EDI") while smaller EDCs such as Citizens' and Wellsboro may

---

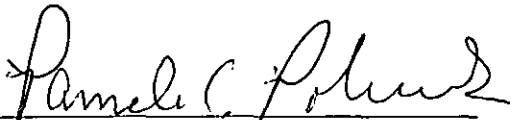
<sup>1</sup> See *EDC Customer Account Number Access Mechanism for EGSs*, M-2013-2355751, at 8 ("Tentative Order").

prefer to process requests through their call centers. Any guidelines adopted by the Commission should be straight-forward, easy to apply and flexible. Citizens' and Wellsboro each have EDI waivers in place until 25% of their customers shop; however, work is underway to implement EDI solutions in the Citizens' and Wellsboro territories. As part of the process, the Companies will evaluate the options to comply with any guidelines that the Commission issues at this docket.

**WHEREFORE**, Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company respectfully request that the Pennsylvania Public Utility Commission consider and adopt, as appropriate, the foregoing Comments.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Pamela C. Polacek (Attorney I.D. #78276)  
Adeolu A. Bakare (Attorney I.D. # 208541)  
McNees Wallace & Nurick LLC  
100 Pine Street  
Harrisburg, PA 17108-1166  
Phone: 717.232.8000  
Fax: 717.237.5300  
[ppolacek@mwn.com](mailto:ppolacek@mwn.com)  
[abakare@mwn.com](mailto:abakare@mwn.com)

Counsel to the Citizens' Electric Company of  
Lewisburg, PA and Wellsboro Electric Company

Dated: May 20, 2013

RECEIVED  
2013 MAY 20 PM 4:18  
PA PUC  
SECRETARY'S BUREAU