



March 10, 2014

**VIA E-Filing**

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

**RE: Investigation of Pennsylvania's Retail Electricity Market Joint  
Electric Distribution Company– Electric Generation Supplier Bill,  
Docket M-2014-2401345**

Dear Secretary Chiavetta:

On February 6, 2014, the Pennsylvania Public Utility Commission (“Commission”) issued a Tentative Order (TO”) to the above referenced docket as part of its Investigation of Pennsylvania’s Retail Electricity Market. The TO addressed suggestions, comments and proposals put forward to make a more supplier-oriented utility consolidated electric bill. In its TO, the Commission recommended the creation of a conspicuous “Shopping Information Box” that can be developed and placed anywhere on the EDC bill. Among other issues, the Commission sought comments to the suggested placement and presentation of the ”Shopping Information Box”, specifically including comments regarding the presentation of information for customers with multiple customer/account numbers.

In lieu of extensive comments, the Pennsylvania Utility Law Project (“PULP”), on behalf of its low-income clients, offers comments limited to presentation of information within the proposed Shopping Information Box. Failure to address other matters discussed within the TO is neither an implied endorsement nor criticism of those recommendations.

PULP is a specialized statewide project of the Pennsylvania Legal Aid Network designated to assist low-income residential utility and energy consumers. For over 30 years, PULP has represented the interests of low income Pennsylvanians in energy and utility matters through direct representation, statewide advocacy, and support and assistance to the staff and clients of local legal aid programs, non-profits and community-based agencies. PULP staff has been actively involved in all phases the

Commission's Retail Markets Investigation as well as a participant in the CHARGE calls hosted by the Office of Competitive Market Oversight ("OCMO").

PULP's recommendation regarding the manner of presentation of rates within the Shopping Information Box is based upon its observation that prices are best understood when presented simply and that Electric Distribution Company prices and Electric Generation Supplier prices are most able to be compared when presented in the same manner. PULP therefore recommends that the rates within the Shopping Information Box be presented to the customer in the same manner as has been provided in the section containing the Price to Compare ("PTC".)

Penelec's bill is used as a reference in this proceeding. The Commission maintains on its website, for educational purposes, a sample Penelec bill, which is available at the following web address: [http://www.puc.pa.gov/general/consumer\\_ed/pdf/Electric\\_Bill\\_Breakdown-Penelec.pdf](http://www.puc.pa.gov/general/consumer_ed/pdf/Electric_Bill_Breakdown-Penelec.pdf). TO, fn.7 at 6. The bill is instructive regarding the presentation of information for customers who may have either single or multiple accounts. In its bill, Penelec presents its current generation and transmission PTC as a standard residential rate of "**7.47 cents per KWH**". Penelec informs the customer that "For you to save, a supplier's price must be lower." The use of 7.47 cents KWH is simply stated and thus an easy standard for the customer to use as a comparison. However, all other rates presented within the bill are presented as 7 or 8 decimal numbers. For example, the First Energy Solutions generation/transmission charge is presented as **.07291139**. This type of presentation, while providing a high level of accuracy, is not easily understood or easily comparable to the presentation of the PTC rate.

The reconciliation by the Commission of this different manner of presentation need not mean that a high degree of accuracy needs to be sacrificed to continue to provide clarity and simplicity. PULP recommends that the generation/transmission rate included in the Shopping Information Box be provided in the same manner as presented for the PTC and that generation/transmission charges be presented for example, as: **7.291139 cents per KWH**.

PULP appreciates the attention to which the Commission has given this issue and supports the Commission's endeavor to enhance the shopping experience by the provision to the consumer of information in a manner which is clearly labeled, easily understood and easily comparable. Please do not hesitate to contact the undersigned should you have questions, concerns, or desire additional information.

Respectfully submitted,  
**Pennsylvania Utility Law Project**  
*On behalf of its low-income clients*



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