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July 21, 2014

VIA FEDERAL EXPRESS FILING

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

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JUL 21 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: **Interim Guidelines for Eligible Customer Lists**
Docket No. M-2010-2183412

Dear Secretary Chiavetta:

Enclosed please find PECO Energy Company's ("PECO") comments in the above-referenced docket.

If you have any questions, feel free to contact me directly at (215) 841-4220.

Very truly yours,

A handwritten signature in black ink, appearing to read "MS", written over a horizontal line.

Michael S. Swerling
Assistant General Counsel
PECO Energy Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**INTERIM GUIDELINES FOR ELIGIBLE
CUSTOMER LISTS** :

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Docket No. M-2010-2183412

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**COMMENTS OF PECO ENERGY COMPANY
ON THE COMMISSION'S TENTATIVE ORDER**

INTRODUCTION

On June 19, 2014, the Pennsylvania Public Utility Commission ("Commission") issued a Tentative Order in Docket No. M-2010-2183412 seeking comments on the Office of Competitive Market Oversight's ("OCMO") recommendation that Electric Distribution Companies ("EDC") perform triennial customer solicitations to update their electric Eligible Customer Lists ("ECL").¹ This is similar to the ongoing triennial solicitation requirement previously established for Natural Gas Distribution Companies ("NGDC").² PECO Energy Company ("PECO" or the "Company") believes that a uniform ECL solicitation applicable to both gas and electric customers will benefit the competitive marketplace. Specifically, a uniform approach will: 1) eliminate duplicative costs associated with separate solicitations (one for electric customers and one for gas customers); 2) allow dual service customers to make one choice every three years; and 3) provide suppliers and

¹ EDCs provide these lists to alternative suppliers containing account information for default service customers that can be targeted for shopping.

² See *Interim Guidelines For Natural Gas Distribution Company Eligible Customer Lists*, Docket No. M-2012-2324075 (Final Order entered on September 23, 2013) in which the Commission adopted interim guidelines requiring:

NGDCs to re-solicit all of their residential and small commercial customers on a triennial basis regarding their options surrounding the disclosure of their customer information for the purposes of creating a new ECL for NGSS.

(Final Order at 4).

marketers with a reliable predetermined schedule for refreshing gas and electric ECLs. PECO appreciates the opportunity to respond and hereby submits these comments in support of a uniform combined solicitation applicable to dual service customers.

COMMENTS

A. PECO plans to issue a single solicitation to all of its gas and electric customers during the first quarter of 2015.

OCMO requested comments on the most effective manner by which EDCs could coordinate dual service solicitations that did not run in tandem. PECO plans to perform a single solicitation applicable to all of its gas and electric customers during the first quarter of 2015. PECO believes doing so is an effective manner to coordinate its dual service solicitation in accordance with the Commission's Tentative Order.

B. A dual service customer's choice to include data should apply equally to gas and electric ECLs.

OCMO sought comments on how dual service customers, through a single solicitation, could include different levels of information on each ECL. Based on PECO's experience, customers prefer to include the same level of information for both gas and electric ECLs. Accordingly, PECO recommends applying each customer's choice of data provision equally to each ECL – both gas and electric. This makes the most sense for PECO customers because their decision is applied at the customer account level (which for PECO customers includes both gas and electric service information). PECO's system also is designed to accommodate common elections, which avoids customer confusion and keeps implementation costs at a reasonable level based on the customer experiences. In addition, this approach avoids Electric

Generation Supplier (“EGS”) confusion and their need to track different customer elections, if a customer was to have different levels of information in the gas and electric ECLs.

C. PECO’s recommendations on the proposed content of company-wide solicitations.

1. What the ECL is?

PECO agrees that solicitations should explain the purpose for having customers participate in ECLs. However, PECO believes that this concept should be explained in a manner that is easily understandable to customers. Therefore, solicitations should provide a clear understanding that suppliers receive customer information, which may be used as a source for EGS marketing campaigns.

2. What customer information is included in an ECL?

PECO believes an explanation should be included in the solicitation making it clear that the utility can provide EGSs with the customer’s name, address, account number and usage. The solicitation may become confusing and lengthy if all of the gas and electric ECL data elements were listed. See PECO’s response to number 3 below in which it suggests placing these data elements on the PECO website. In addition, according to PECO’s experience, providing these elements does not increase a customer’s willingness to include more information in the ECL.

3. What the more detailed information represents.

Based on PECO’s experience, the information detailed in the solicitation should be simple to encourage the inclusion of customer data in the ECL. Including explanations about other data elements (such as load profiles, transmission/capacity obligations, and peak demand)

may confuse customers and cause them to restrict data. However, PECO agrees that explanations about these data points should be available to any interested customers. Therefore, PECO will consider placing such detail on its website.

4. How this information is used by EGSs.

PECO believes a statement in the solicitation explaining that customer information can be provided to suppliers who will use it to contact them about competitive offers should be satisfactory.

5. How EDCs safeguard this information.

PECO agrees that the solicitation should explain how EDCs will safeguard customer data. This point is best accomplished by explaining that EDCs will only share information (according to the customer's direction) with Natural Gas Suppliers ("NGS") and EGSs that have been licensed by the Commission.

6. How wide this information will be disseminated.

Please see PECO's response to number 5 above.

7. Potential benefits of including your information.

Regarding the benefits of including customer information in the ECL, PECO believes that the solicitation should state, with the customer's acquiescence, data contained in the ECL will help make various competitive options (rates, contract terms, renewable energy, etc.) available to the customer.

8. Outline the methods customers can use to choose the information they prefer to include.

PECO agrees that the solicitation should contain the methods that customers may use to include information in ECLs. This can be accomplished by explaining that customers may notify EDCs of their election by mail by completing and returning the bill insert solicitation card, on the utility's website, or by contacting a customer service representative.

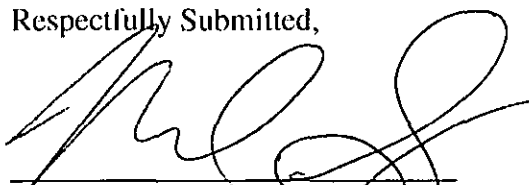
D. Cost Recovery.

Because PECO already has invested in the infrastructure necessary to maintain ECLs with common customer elections and performed solicitations, ongoing costs are expected to be modest and will be recovered through base rates. However, should the Commission adopt additional requirements for ECLs, solicitations, or further customer communications, PECO reserves the right to seek recovery on a full and current basis.

III. CONCLUSION

PECO appreciates the opportunity to comment on this important matter and requests that the Commission favorably consider these comments.

Respectfully Submitted,



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July 21, 2014

For PECO Energy Company

From: (215) 841-5353
Anita Zaketa

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Rosemary Chiavetta, Secretary
PA Public Utility Commission
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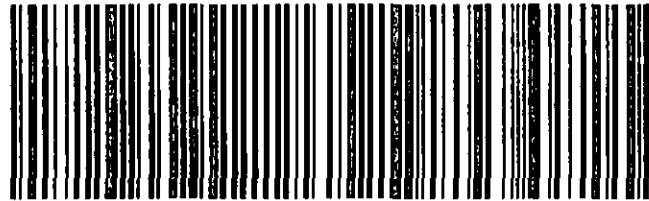
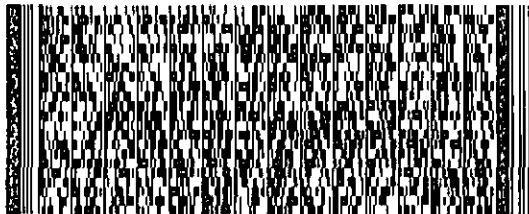
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