

**PENNSYLVANIA UTILITY LAW PROJECT
118 LOCUST STREET
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March 24, 2013

Via E-Filing

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

Re:

**Petition of PECO Energy Company for
Approval of its Default Service Program II**

P-2012-2283641

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs	P-2011-2273650 P-2011-2273668 P-2011-2273669 P-2011-2273670
Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan	P-2012-2302074
Petition of Duquesne Light Company For Approval of a Default Service Program And Procurement Plan for the Period June 1, 2013 through May 31, 2015	P-2012-2301664

Dear Secretary Chiavetta:

Enclosed please find the Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania ("CAUSE-PA") regarding the Commission's Tentative Order concerning reconsideration of the Retail Opt-In programs in the above referenced matters. These copies are being provided, as per the Certificate of Service, in electronic format to all parties. Should you have any questions or concerns please do not hesitate to contact the undersigned. Thank you.

**PENNSYLVANIA UTILITY LAW PROJECT
Counsel to CAUSE-PA**



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CC: Office of Special Assistants

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company for
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Docket No. P-2012-2283641

Joint Petition of Metropolitan Edison
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Their Default Service Programs

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P-2011-2273668
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and Procurement Plan

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For Approval of a Default Service Program
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the Comments of CAUSE-PA to the Tentative Order on Reconsideration in the above Docketed matters as set forth below in accordance with the requirements of 52 Pa. Code § 1.54(b)(3):

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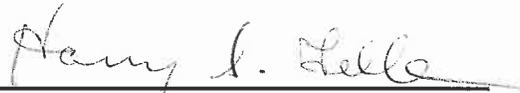
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Respectfully submitted,
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Date: March 24, 2013

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PUBLIC UTILITY COMMISSION**

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Docket No. P-2012-2301664

TENTATIVE ORDER ON RECONSIDERATION

COMMENTS OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA
("CAUSE-PA")

March 24, 2013

The Coalition For Affordable Utility Services and Energy Efficiency In Pennsylvania (“CAUSE-PA”), an intervenor in each of the above captioned proceedings, through their counsel, The Pennsylvania Utility Law Project (“PULP”), respectfully submits these Comments to the Tentative Order on Reconsideration (“TO”) of the Pennsylvania Public Utility Commission (“Commission”) adopted and entered on March 14, 2013 to each of the above captioned proceedings.

In its TO, the Commission tentatively reconsidered the implementation schedule for the Retail Opt-In (“ROI”) Program in each of the captioned proceedings based upon its concern that implementation of the ROI Program so close in time to the implementation of the Standard Offer Referral Program may result in confusion for customers. The Commission is tentatively planning to postpone implementation of the ROI Program in each of the affected EDC service territories in order to permit the Standard Offer Customer Referral Program to move forward on its own. The Commission intends to revisit the ROI Program after it has had the opportunity to consider the ongoing results of the Standard Offer Referral Program.

CAUSE-PA supports delayed implementation of the ROI Program and believes that the implementation of both programs so close to one another would likely engender customer confusion. This was the position taken by CAUSE-PA in each of these proceedings. For example, CAUSE-PA Witness Carol J. Biedrzycki testified in the four First Energy Companies’ Joint Default Service Plan Proceeding:

Introducing the Customer Referral Program on the heels of the Opt-in Aggregation Program may lead to customer confusion and may have the unintended consequence of turning customers off to the shopping experience. It

is likely that many customers will not appreciate a distinction between the Opt-in Aggregation Program and the Customer Referral Program.¹

Further, CAUSE-PA believes that time is needed following completion of the Standard Offer Referral Program to review its implementation, analyze results, and consider the lessons learned prior to a determination to implement the ROI. It may be that the Standard Offer Referral Program has accelerated residential customer shopping to an extent that the additional resources required to be dedicated to a ROI would no longer be prudent. In addition, the customer experience during and after the Standard Offer Referral Program will no doubt be instructive to the Commission about any modifications that may need to be made to the ROI process.

Accordingly, CAUSE-PA supports the Commission's determination to postpone implementation of the ROI Program in each of the captioned proceedings in order to avoid customer confusion and to enable the Commission to fully review implementation, analyze results, and consider the lessons learned of the Standard Offer Customer referral Program prior to a determination to implement the ROI.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
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¹CAUSE-PA ST-1, Direct Testimony of Carol J. Biedrzycki, Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of their Default Service Programs, 31:4-7.