



Exelon Business Services Company
Legal Department
2301 Market Street/S23-1
Philadelphia, PA 19103
215 568 3389 Fax
www.exeloncorp.com

December 18, 2013

VIA eFILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Investigation of Pennsylvania's Retail Electricity Market:
End State of Default Service, Docket No. I – 2011-2237952**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is **PECO Energy Company's Plan for Accomplishing Seamless Moves and Instant Connects** and associated **Certificate of Service**.

Sincerely,

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

W. Craig Williams
Assistant General Counsel

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INVESTIGATION OF :
PENNSYLVANIA’S RETAIL : **DOCKET NO. I-2011-2237952**
ELECTRICITY MARKET: :
END STATE OF DEFAULT SERVICE :

**PECO ENERGY COMPANY’S
PLAN FOR ACCOMPLISHING
SEAMLESS MOVES AND INSTANT CONNECTS**

I. INTRODUCTION

PECO Energy Company (“PECO” or the “Company”) hereby submits its Plan for Accomplishing Seamless Moves and Instant Connects (“Plan”) for review and approval by the Pennsylvania Public Utility Commission (“Commission”). PECO submits this plan in accordance with the Commission’s Final Order in the Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service (“Final Order”) entered February 14, 2013.¹

In the Final Order, the Commission directed electric distribution companies (“EDCs”) to (i) “develop and submit plans to the Commission by the end of 2013” to implement a “seamless move” and an “instant connect” in their service territories by June 1, 2015, and (ii) include costs associated with plan implementation along with proposals for the recovery of those costs.² In compliance therewith, this Plan sets forth the processes by which PECO will effect seamless moves and instant connects for customers of electric generation suppliers (“EGSs”), as well as anticipated costs and a proposed cost-recovery mechanism.

¹ *Final Order: Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service*, Docket No. I-2011-2237952 (February 14, 2013).

² *Id.* at 74-75.

PECO requests approval of the Plan and recovery of costs to implement the Plan.

II. BACKGROUND

A. Regulatory Requirement

The Commission initiated an investigation into Pennsylvania's retail electricity market in an Order entered April 29, 2011.³ The goal of that investigation was to solicit recommendations for improving the Commonwealth's retail electricity market. On July 28, 2011, the Commission concluded that Pennsylvania's retail market for electricity required additional changes to effectuate the legislative intent of the Electricity Generation Customer Choice and Competition Act, 66 Pa. C.S. §§ 2801, *et seq.*⁴ The Commission therefore recommended that a second phase of the investigation be conducted by the Office of Competitive Market Oversight ("OCMO").⁵ One issue addressed in the second phase was the development of long-term structural changes to the default service model.⁶

In the Final Order, the Commission focused on, among other issues, the amount of time some customers spend on default service due to regulatory and administrative delays, when those customers already have a relationship with an EGS or have selected an EGS in the course of establishing a new electric account with the default-service utility.⁷ Under previous switching rules and practices, the Commission noted that after a customer elects EGS service, that customer might spend between 16 and 45 days on default service while awaiting completion of the EGS enrollment.⁸ Some of the delay in effecting a supplier switch was attributable to anti-slamming regulations, which required a 10-day confirmation period before permitting the supplier switch to occur. The Commission noted that the delay in getting a customer to the

³ See *Investigation of Pennsylvania's Retail Electricity Market*, Docket No. I-2011-2237952 (April 29, 2011).

⁴ *Final Order*, at 4-5.

⁵ *Id.* at 5.

⁶ *Id.*

⁷ See *id.*, at 69-75.

⁸ *Id.* at 69.

selected EGS represented “a lost savings opportunity that, in turn, results in customer frustration and disappointment and a less-than-favorable opinion of the competitive retail market.”⁹

In an effort to immediately reduce some of the time spent on default service, the Commission issued interim regulations to temporarily reduce the 10-day confirmation period to 5 days in the anti-slamming regulations.¹⁰ In addition to shortening the waiting period, the Commission ordered additional rulemaking to explore ways to further accelerate switching to EGS service.¹¹

However, the Commission noted that a future rulemaking was not necessary to make changes in two areas that would accelerate EGS switching and therefore decrease the time spent on default service: seamless moves and instant connects. A seamless move is the “ability of a customer’s choice of supplier to move with the customer to a new address without interruption.”¹² An instant connect is the “ability of supply service to start on ‘day one’ of new utility service – without the customer first having to go on default service.”¹³

B. Stakeholder Process

In July 2013, the Electronic Data Exchange Working Group (“EDEWG”) – the group charged by the Commission with developing technical standards associated with the implementation of retail electric competition in Pennsylvania – formed a subgroup with Pennsylvania EDCs to develop a common approach to the seamless move and instant connect processes. Once the subgroup developed a proposal for implementation of seamless moves and instant connects, the subgroup sought input on the proposal from Pennsylvania EGSs (the working group of EDEWG, EDCs and EGSs is hereinafter the “EDEWG Stakeholder

⁹ *Id.*

¹⁰ See, *Final Order, Interim Guidelines Regarding Standards for Changing a Customer’s Electricity Generation Supplier*, Docket No. M-2011-2270442 (Order entered October 24, 2012)(“Interim Guidelines”).

¹¹ *Final Order*, at 69-70.

¹² *Id.* at 70.

¹³ *Id.*

Subgroup”). The EDEWG Stakeholder Subgroup then worked collaboratively to refine the processes to reach a mutually agreed-upon solution.

The EDEWG Stakeholder Subgroup recommended that seamless moves be effectuated by an Electronic Data Interchange (“EDI”) move transaction between the EDC and the EGS. Accordingly, when a current customer with an existing EGS relationship intends to move to a new location with that supplier and timely notifies the EDC of the intent to maintain the EGS relationship at the new location, the EDC would send a move transaction to the EGS prior to the connect date. Under the EDEWG Stakeholder Subgroup recommendation, the existing EGS would transfer with the customer to the new account at the new location and the customer would not be served by default service during the transition.

The EDEWG Stakeholder Subgroup recommended for instant connects that the customer should provide the new utility account number to the EGS, and the EGS would then send a timely enrollment transaction to the EDC (not less than 11 days in advance)¹⁴ on the *pending active* account.¹⁵ Re-designing the EDC’s system to allow acceptance of an EGS enrollment request on a *pending active* customer account, as opposed to waiting for the new account to become *active*, will eliminate default service for customers who timely enroll.

III. CURRENT PECO CUSTOMER EXPERIENCE

As a threshold matter, it is worth noting that PECO actively encourages its customers to consider retail suppliers for their electricity needs. To that end, PECO invites customers to

¹⁴ The EDEWG Stakeholder Subgroup participants agree that 11 days advance notice is the minimum working period, considering the regulation requiring a confirmation waiting period and necessary lead times with PJM.

¹⁵ Historically, PECO notes that about 8% of the retail customers establishing new service contact PECO outside of the 11-day window.

review their supplier choices on the Pennsylvania Power Switch website and currently has a referral program in place that provides customers another path to EGS service.

A. EGS Enrollments Are Currently Accepted Only On *Active* Accounts

When a current PECO customer that has selected an EGS moves within PECO's service territory, PECO establishes a new customer account for the new location. To establish EGS service on that new account under the current PECO structure, the customer must provide the EGS with the new account information, and the EGS must then send PECO an enrollment transaction once the new customer account becomes *active*. In essence, the customer move is treated the same as a new customer account.

If the EGS sends the enrollment request prior to the new account becoming *active*, PECO cannot process the request under current system constraints. If the account is *active* on receipt of the enrollment request, PECO notifies the EGS that the request has been accepted and provides the effective date of service on the new account. In compliance with its current Electric Generation Supplier Coordination Tariff, PECO effects the supplier change at the beginning of the next billing period after the current 11-day switching period.¹⁶ Until the EGS begins service on the new account, PECO provides default service.

¹⁶ See *PECO Energy Company Electric Generation Supplier Coordination Tariff, Supplement No. 15 to Tariff Electric Pa. P.U.C. No. 1S*, at § 5.3.1(b) (effective Jun. 14, 2013) ("PECO EGS Tariff").

B. PECO Is Temporarily The Default Service Provider For All New Connects

For all new customers establishing new accounts and desiring an EGS to serve the account, the customer's account must be *active*. Under PECO's current processes, once the account is active, the customer provides the account information to their EGS of choice, and the EGS then sends an enrollment transaction to PECO. PECO's current systems are not configured to process EGS enrollment requests on accounts that are not yet *active*. Because the account must be *active* before PECO can accept an enrollment transaction, there is a brief period in which the new customer is placed on default service.

IV. PECO'S IMPLEMENTATION PLAN

PECO accepts the recommendations of the EDEWG Stakeholder Subgroup and incorporates those recommendations into its Plan. Accordingly, PECO will utilize a new move transaction to implement a seamless move and will modify the Company's existing system to permit instant connects on *pending active* accounts.

A. PECO's Seamless Moves Plan

PECO plans to utilize a new move transaction to accomplish seamless moves going forward. The move transaction will enable the EGS serving a customer's current account to move to the customer's new account without service interruption.¹⁷

¹⁷ If a customer moving to a new address does not wish to continue with their current EGS and instead wants to return to default service, PECO will return the customer to default service at the new location in accordance with Section 5.3.3. of PECO's EGS Tariff. Similarly, if the customer wants to select another EGS, the customer will be redirected to their current supplier to effect that change in compliance with 52 Pa. Code. §§ 57.173-174.

1. Enrollment Criteria

For a customer to be eligible for a seamless move, the EDEWG Stakeholder Subgroup has agreed that certain enrollment criteria must be met. The criteria establish a framework upon which EGSs and EDCs may reasonably rely for the implementation of seamless moves. Given the level of complexity and the associated design requirements for seamless moves, a change in the underlying assumptions (or criteria) may necessitate a wholesale redesign of the implementation solution.

- Move requests must come at least one day in advance of the requested transaction. Same-day or back-dated requests cannot be accepted, because there is no opportunity to notify the EGS or PJM of the added customer.
- The customer must provide PECO with a disconnect date on the current account¹⁸ and a connect date for the new account.¹⁹ The disconnect date and connect date do not need to be the same, and in fact, the dates may overlap or have a gap between them.
- There must be an active meter at the new premise when the customer calls to establish EGS service on the new account. If meter information is not available, such as with new construction, there will be insufficient information for a move transaction.
- For a seamless move to occur, the current account must be *active* at the time of the customer's request for service on the new account. If the current account is *pending active*, or is *inactive*, a seamless move cannot occur. In addition, the new account must be in a *pending active*²⁰ status in order to effectuate a seamless move.

¹⁸ A "current account" is the account where the customer is presently located and has service today.

¹⁹ A "new account" is the account that is not in service today, but will serve the customer's new location at a future date.

²⁰ A "pending active" account is an account that is not currently active today, but is set to be active at a specified date in the future.

- An EGS must be providing service on the customer's current account to be eligible for a seamless move. If the customer has chosen an EGS to serve the current account, but the EGS has not yet begun to provide service on that account, for whatever reason, the account will be ineligible for a seamless move.

In addition, customers must seamlessly move within the same rate class and same procurement class²¹ as their current account. Billing options on the customer's new account will also remain the same as the current account in a seamless move.²² At this time, only electric service is involved with seamless moves.²³

2. Enrollment Process Utilizes A Move Transaction

If the criteria above have been met, PECO will inform the customer that the current EGS will seamlessly move to the new account. PECO will send new move transactions in batch to each EGS at the end of the day in which they were generated. In the move transaction, the EGS will receive information similar to what is currently provided in a change-request transaction, including customer name, service address and rate class.²⁴ PECO will provide the EGS with: (i) the current account number; (ii) the new account number; and (iii) the service start date. In addition, the move transaction gives the EGS non-discretionary notice of the obligation to provide service on the new account. Once the move transaction has been sent to the EGS, the EGS will begin to serve the new account seamlessly as of the service start date.

²¹ Only PECO's Residential and Small Commercial Procurement Classes (Classes 1 and 2) will be eligible for a seamless move. The Procurement Class categories are consistent with the structure of PECO's Standard Offer program. Excluding customer accounts exceeding this comports with the recommendation of the EDEWG Stakeholder Group and the request of the EGSs.

²² Billing options may be changed upon request once the seamless move is complete.

²³ There is an opportunity to consider seamless moves for gas service in the context of Gas RMI. At present, it appears that seamless moves may not be permitted for gas service. See 52 Pa. Code. § 62.75(c)(7) (noting that, in the context of required consumer disclosures, "[w]hen a customer moves from one location to another, even if the move is within [a natural gas distribution company's] service territory, the agreement is cancelled").

²⁴ Although the move transaction has been proposed by the EDEWG Stakeholder Subgroup, PECO recognizes that the transaction will still go through the approval process.

There are, however, instances in which the seamless move could be terminated or voided after the move transaction is complete, including where the customer: (i) voids or terminates the new account prior to the service start date; (ii) requests to change the service start date on the new account to a date occurring in the past; (iii) requests same-day connect service on the new account, after having previously chosen a service start at some future date; and (iv) enrolls a new EGS on the current account before the connection to the new account occurs. In these instances, PECO will send a drop notification to the EGS.

B. PECO's Instant Connects Plan

In its Final Order, the Commission recognized the potential disadvantage to EGSs where a new customer is placed on default service during the EGS enrollment process.²⁵ Responding to the concern that customers may “stay with the default service simply out of inertia,” the Commission required that all EDCs develop a plan to permit new customers to start service immediately with an EGS without requiring the customer to flow through default service – an instant connect.²⁶

Currently, PECO can accept an EGS enrollment only on *active* accounts. PECO accepts and incorporates into its Plan the recommendation of the EDEWG Stakeholder Group to permit enrollments on *pending active* accounts. With this system change, customers will be able to select an EGS at the time they establish an account, even if that account will become active at a future date (a *pending active* account).

When a customer contacts PECO to request a new connection, PECO will provide the new account number to the customer. At that time, PECO will also provide the customer with information about EGS enrollment options. If the customer has already chosen an EGS, the

²⁵ *Final Order*, at 75.

²⁶ *Id.*

customer will be directed to contact the EGS and provide the EGS with the customer's new account number. If the customer would like to choose an EGS, but has not yet done so, the PECO Customer Service Representative ("CSR") will provide the customer with information about PECO's Smart Energy Choice Program²⁷ (if still applicable) or direct the customer to the Pennsylvania Power Switch website.

Once the EGS has the requisite customer information, the EGS will submit an enrollment transaction to PECO, and the customer will be enrolled with the EGS under current practices. The critical difference is that the customer is able to effect that enrollment on a *pending active* account, so that EGS service becomes *active* when the account becomes *active*, thereby avoiding default service.

In accord with the conclusions of the EDEWG Stakeholder Group, PECO agrees that there must be 11-days advanced notice to effect an instant connect. The 11-day notice is necessary to fulfill the (temporary) 5-day regulatory confirmation period, provide mailing notice to the customer and to coordinate with PJM. If the enrollment request is not received 11 days in advance of the requested enrollment date, PECO will ensure the EGS is made the service provider as soon as possible.

V. PLAN COSTS AND COST RECOVERY

In its Final Order, the Commission directed the EDCs to include the costs for implementation of a seamless move and an instant connect, as well as proposals for recovery of these costs in their plans.²⁸ PECO is proposing to implement procedures relating to both a seamless move and an instant connect simultaneously. PECO currently estimates the total implementation cost to be approximately \$5.0 million. Should the Commission decline to pursue

²⁷ This program is also referred to as the Customer Referral Program.

²⁸ *Final Order*, at 74-75.

either seamless moves or instant connects, or modify the Plan, PECO will necessarily need to adjust this cost estimate.²⁹

PECO intends to recover the actual costs associated with the implementation of seamless moves and instant connects as directed by the Commission in its Final Order. Consistent with its recovery of other market enhancement costs arising out of the Commission's Retail Market Investigation and the Commission's Final Order in PECO's second DSP case,³⁰ the Company is proposing to recover 50% of its costs through a Purchase of Receivables ("POR") discount and 50% through the Generation Supply Adjustment ("GSA"). In order to achieve this cost recovery, PECO will make adjustments to its GSA tariff rate to include 50% of the total costs amortized over a one-year period, with the remaining 50% of project costs recovered through the POR discount. Upon Commission approval of this Plan, PECO will file modifications to its supplier tariff to adjust the POR discount, as necessary, and begin to flow project cost through its GSA mechanism.

VI. SCHEDULE AND IMPLEMENTATION

Based on PECO's analysis of the implementation schedule, it will take fifteen months from Plan approval to fully implement the system changes that will be required to accomplish seamless moves and instant connects. Based on a fifteen-month project implementation period, PECO would need Plan approval by March 31, 2014 to meet the June 1, 2015 Plan-

²⁹ PECO notes that the Commission has directed that rulemaking will take place to explore further methods to accelerate switching timeframes, including off-cycle switching. *See Final Order*, at 70 (referencing Interim Guidelines). Depending upon the timing of further switching rulemaking, there may exist some cost efficiencies in combining the design efforts of seamless moves/instant connect transactions with the design of off-cycle switching protocol.

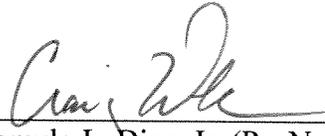
³⁰ *Order: Petition of PECO Energy Company for Approval of its Default Service Program II*, Docket No. P-2012-2283641 (February 14, 2013), at 13.

implementation deadline. If Plan approval comes after March of 2014, PECO may need leave of the Commission to extend the implementation deadline.

VII. CONCLUSION

PECO respectfully requests that the Commission approve its Plan For Accomplishing Seamless Moves and Instant Connects, including cost recovery of the same, as set forth herein.

Respectfully submitted,



Romulo L. Diaz, Jr. (Pa. No. 88795)
Anthony E. Gay (Pa. No. 74624)
W. Craig Williams (Pa. No. 306405)
Exelon Business Services Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699
Phone: 215.841.5974
Fax: 215.568.3389
E-mail: Craig.Williams@exeloncorp.com

Courtney L. Schultz (Pa. No. 306479)
Pamela S. Goodwin (Pa. No. 33254)
Saul Ewing LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102
Phone: 215-972-7717
Fax: 215-972-1839
E-mail: CSchultz@saul.com

Date: December 18, 2013

Counsel for PECO Energy Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

INVESTIGATION OF :
PENNSYLVANIA'S RETAIL : **DOCKET NO. I-2011-2237952**
ELECTRICITY MARKET: :
END STATE OF DEFAULT SERVICE :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of PECO Energy Company's Plan for Accomplishing Seamless Moves and Instant Connects on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA E-FILING

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

VIA FIRST CLASS MAIL

Abraham Silverman
NRG Energy Inc.
211 Carnegie Center
Princeton, NJ 08540

Tanya J. McCloskey
Acting Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

Honorable Camille George
Pennsylvania House of Representatives
38 B East Wing
Harrisburg, PA 17120-2020

Pamela C. Polacek, Esq.
McNees Wallace & Nurick
Citizen's Electric Company of Lewisburg PA
and Wellsboro Electric Co.
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166

Terrance J. Fitzpatrick, President and CEO
Energy Association of Pennsylvania
800 N. 3rd Street, Suite 205
Harrisburg, PA 17102

Edward V. Johnstonbaugh, Administrator
Future Times Energy Aggregation Group
474 Justabout Road
Venetia, PA 15367

Frank Caliva, III, Consultant
Strategic Communications LLC
Pennsylvania Energy Marketers Coalition
3532 James Street, Suite 106
Syracuse, NY 13206

Joel Malina, Executive Director
Compete Coalition
1317 F Street NW, Suite 800
Washington DC 20004

Theodore S. Robinson, Esq.
Citizen Power
2121 Murray Avenue
Pittsburgh, PA 15217

Michael Meath, President
Strategic Communications, LLC
Pa Energy Marketers Coalition
3532 James Street, suite 106
Syracuse, NY 13206

Madelon Kuchera, Esq.
BlueStar Energy Services
363 West Erie Street, 7th Floor
Chicago, Il 60654

Todd S. Stewart, Esq.
Hawke McKeon and Sniscak LLP
Dominion Retail & Interstate Gas Supply
100 North Tenth Street
Harrisburg, PA 17101

John J. Gallagher, Esq.
Pike County Light and Power
711 Forrest Rd.
Harrisburg, PA 17112

Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott LLC
Retail Energy Supply Association
213 Market Street, 8th Floor
Harrisburg, PA 17108-1166

PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101-1414

Richard Hudson
Director of Regulatory Affairs
Consolidated Edison
1102 Park Square
Munhall PA 15120

Daniel Clearfield, Esq.
Eckert Seamans Cherin & Mellott LLC
Direct Energy Services
213 Market Street, 8th Floor
Harrisburg, PA 17101

Dr. Andrew Klier
Professor, Earth & Mineral Engineering
Penn State University
213 Hosler Building
University Park, PA 16802

Tim Locascio, Manager
Liberty Power Corp.
1970 West Cypress Creek Road, Suite 600
Fort Lauderdale, Fl 33309

Elizabeth R. Marx, Esq.
Pa. Coalition Against Domestic Violence
3605 Vartan Way
Harrisburg, Pa 17110

Sam Denisco
VP of Government Affairs
Pennsylvania Chamber of Business and
Industry
417 Walnut Street
Harrisburg, PA 17101-1902

Katie Bolcar
The Solar Alliance
PO Box 392
Linthicum, MD 21090

Honorable Barry Smitherman, Chairman
Public Utility Commission of Texas
1701 N. congress Avenue
Austin, TX 78711-3326

Scott J. Schwarz, Esq.
City of Philadelphia
1515 Arch Street, 16th Floor
Philadelphia, PA 19102-1595

Chris Hendrix
Director Regulatory Compliance
Texas Retail Energy
2001 S. E. 10th Street
Bentonville, AR 72716

Harry Kingerski
Director of Regulatory Affairs
Spark Energy, LP
2105 City West, Suite 100
Houston, TX 77042

Jay Kooper
Director of Regulatory Affairs
Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095

The Honorable Phyllis Mundy
State Rep
120th Legislative District
36 East Wing
P.O. Box 202120
Harrisburg, PA 17120-2120

Paul E. Russell, Esq.
PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101

Frederick J. Eichenmiller, Esq.
Duquesne Light
411 Seventh Avenue, 8th Floor
Mail Drop 8-5
Pittsburgh, PA 15219

Thu B. Tran, Esq.
Community Legal Services Inc.
1424 Chestnut Street
Philadelphia, PA 19102

David S. Cohen, President
Rescom Energy LLC
20 East Avenue
Bridgeport, CT 06610

William R. Lloyd, Jr.
Office of Small Business Advocate
Steven C. Gray, Esq.
Suite 1102
Commerce Building
300 N. Second Street
Harrisburg, PA 17101

Jacob G. Smeltz, Vice President
Electric Power Generation Association
800 North Third Street, Suite 303
Harrisburg, PA 17102

Ray Landis
Director Government Affairs
AARP
30 N 3rd Street, Suite 750
Harrisburg, PA 17101

Aron J. Beatty, Esq.
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923

Melanie J. Elatieh, Esq.
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406

Deanne M. O'Dell, Esq.
Eckert Seamans Cherin & Mellott LLC
Stream Energy Pa
213 Market Street, 8th Floor
Harrisburg, PA 17101

David Fein, Vice President
Constellation Energy Group Inc.
Constellation NewEnergy Inc & Constellation
Energy Commodities Group Inc.
10 South Dearborn Street, 47th Floor
Chicago, IL 60603

Brian J. Knipe, Esq.
Buchanan Ingersoll & Rooney PC
76 South Main
Akron, OH 44308

Courtney Lane
Citizens for Pennsylvania's Future PennFuture
1500 Walnut Street, Suite 502
Philadelphia, PA 19102

Michael A. Gruin, Esq.
Stevens & Lee
Washington Gas Energy Services Inc.
17 North Second Street, 16th Floor
Harrisburg, PA 17101

Robert M. Strickler, Esq.
Griffith Strickler Lerman Solymos & Calkin
York County Solid Waste & Refuse Authority
110 South Northern Way
York, PA 17402-3737

Robert H. Hoaglund, III
Assistant General Counsel
Duquesne Light Company
411 Seventh Avenue, 16th Floor 16-1
Pittsburgh, PA 15219

Divesh Gupta, Esq.
Constellation Energy
Constellation NewEnergy Inc
111 Market Place, Suite 500
Baltimore, MD 21202

Craig G. Goodman, President
National Energy Marketers Association
3333 K Street NW, Suite 110
Washington, DC 20007

Harry A. Warren, Jr.
Washington Gas Energy Inc.
13865 Sunrise Valley Drive, Suite 200
Herndon, VA 20171-4661

Vera J. Cole, PhD.
Mid-Atlantic Renewable Energy Association
2045 Upper Rocky Dale Road
Green Lane, PA 18054

Todd S. Stewart, Esq.
Hawke McKeon and Sniscak LLP
Interstate Gas Supply
100 North Tenth Street
Harrisburg, PA 17101

Bruce H. Burcat
Mid Atlantic Renewable Energy Coalition
P.O. Box 385
Camden, DE 19934

Gary A. Jack
Assistant Vice President Regional Affairs
Duquesne Light
411 Seventh Avenue
Pittsburgh, PA 15219

Teresa K. Schmittberger, Esq.
McNees Wallace and Nurick LLC
Industrial Customer Groups
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108

Elizabeth Nottingham, President
Verdigris Energy LLC
P.O. Box 1777
Allen, TX 75013

Glen Thomas, President
GT Power Group LLC
1060 First Avenue, Suite 400
King of Prussia, PA 19406

Linda R. Evers, Esq.
Stevens and Lee
Washington Gas Energy Services
111 North Sixth Street
P.O. Box 679
Reading, PA 19603-0679

Amy M. Klodowski, Esq.
FirstEnergy Solutions Corp.
800 Cabin Hill Drive
Greensburg, PA 15601

Dana Pirone Carosella, Esq.
Stevens & Lee PC
Wal-Mart Stores East LP and Sams East Inc.
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406

Mark C. Morrow, Esq.
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406

Darryl A. Lawrence, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

Bradley A. Bingaman, Esq.
FirstEnergy
76 South Main Street
Akron, OH 44308-1890

Tori L. Giesler, Esq.
FirstEnergy
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

Anthony D. Kanagy, Esq.
Post & Schell
Duquesne Light Company
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601

Michael Speerschneider, Senior Manager
EverPower Wind Holdings, Inc.
1251 Waterfront Place, 3rd Floor
Pittsburgh, PA 19335

Benjamin L. Willey, Esq.
Law Offices of Benjamin L. Willey LLC
York Co. Solid Waste & Refuse Authority
7272 Wisconsin Avenue, Suite 300
Bethesda, MD 20814

Elizabeth P. Trinkle
McNees & Wallace and Hurick LLC
Citizens' Electric Company and Wellsboro
Electric Company
100 Pine Street
PO Box 1166
Harrisburg, Pa 17108-1166

Harry S. Geller, Executive Director
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Elsie Caplan, Project Manager
American Public Power Association
1875 Connecticut Avenue, NW
Washington, DC 20009

Shelby A. Linton-Keddie, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Pamela C. Polacek, Esq.
McNees Wallace & Nurick
Industrial Customer Groups
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Christopher C. O'Hara
Assistant General Counsel
NRG Energy Inc
211 Carnegie Center Drive
Princeton, NJ 08540

Nancy Bagot
Vice President of Regulatory Affairs
Electric Power Supply Association
1401 New York Avenue NW, 12th Floor
Washington, DC 20005



Romulo L. Diaz, Jr. (Pa. No. 88795)
Anthony E. Gay (Pa. No. 74624)
W. Craig Williams (Pa. No. 306405)
Exelon Business Services Company
2301 Market Street
P.O. Box 8699
Philadelphia, PA 19101-8699
Phone: 215.841.5974
Fax: 215.568.3389
E-mail: Craig.Williams@exeloncorp.com

Courtney L. Schultz (Pa. No. 306479)
Pamela S. Goodwin (Pa. No. 33254)
Saul Ewing LLP
1500 Market Street, 38th Floor
Philadelphia, PA 19102
Phone: 215-972-7717
Fax: 215-972-1839
E-mail: CSchultz@saul.com

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Counsel for PECO Energy Company