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April 20, 2015

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

VIA HAND DELIVERY

**RE: Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company
Docket Nos. M-2015-_____ and M-2015-_____**

Dear Secretary Chiavetta:

Attached please find the Joint Report of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company (collectively, "Companies") Regarding Seamless Moves and Instant Connects in compliance with the March 20, 2015, Secretarial Letter issued by the Pennsylvania Public Utility Commission and the February 27, 2015, Opinion and Order on the Companies' recent joint default service plan at Docket Nos. P-2014-2425024 and P-2014-2425245.

Please date stamp the extra copy of this transmittal letter and report, and kindly return it to our messenger for our filing purposes. Thank you.

Sincerely,

McNEES WALLACE & NURICK LLC

By

Elizabeth P. Trinkle

/lmc

Enclosures

- c: Office of Competitive Market Oversight (ra-OCMO@pa.gov)
- Office of Consumer Advocate
- Office of Small Business Advocate

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Citizens' Electric Company	:	
of Lewisburg, PA and	:	Docket Nos. M-2015- _____
Wellsboro Electric Company	:	M-2015- _____

**JOINT REPORT OF
CITIZENS' ELECTRIC COMPANY OF LEWISBURG, PA
AND WELLSBORO ELECTRIC COMPANY REGARDING
SEAMLESS MOVES AND INSTANT CONNECTS**

Citizens' Electric Company of Lewisburg, PA ("Citizens") and Wellsboro Electric Company ("Wellsboro") (collectively, the "Companies") hereby submit this Joint Report in compliance with the March 20, 2015 Secretarial Letter issued by the Pennsylvania Public Utility Commission ("PUC" or "Commission").¹ The Secretarial Letter requires all jurisdictional electric distribution companies ("EDCs") to file a revised plan to implement seamless moves and instant connects in their services territories by July 1, 2016. The Secretarial Letter also requires that each EDC's plan demonstrate how the EDC will achieve seamless moves and instant connects and the timeframes for meeting the implementation deadline. The Secretarial Letter further requires that each plan provide an estimate of the costs to design, test, implement and maintain seamless moves and instant connects, and proposals for cost recovery. In accordance with these directives, the Companies submit as follows:

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¹ *EDC Plan Filings for Seamless Moves and Instant Connects*, Secretarial Letter, Docket Nos. M-2014-2401127, et al. (Mar. 20, 2015).

I. BACKGROUND

The Commission's February 25, 2013 Order on the end state of default service in Pennsylvania imposed retail market enhancement ("RME") obligations in addition to the prior directives from the Commission's 2012 Retail Markets Investigation.² These obligations included the requirement that EDCs file plans for implementing seamless moves and instant connects in their service territories. This directive conflicted with prior Orders waiving the Companies' obligation to install electronic data interchange ("EDI") software in their service territories.³ Accordingly, the Companies requested a waiver, as part of approval of their recent joint default service program ("DSP"), of any requirement to implement seamless moves or instant connects pending the Companies' implementation of EDI software. The Commission granted the requested waiver and required the Companies to submit another filing by June 1, 2015, addressing their capability to offer seamless moves and instant connects.⁴

Although the Secretarial Letter did not specifically require the Companies to submit a seamless moves/instant connects plan, Citizens' and Wellsboro are pleased to report that the Companies' joint EDI development and implementation project is nearing completion. EDI software will eventually facilitate automated seamless moves and instant connects in Citizens' and Wellsboro's service territories, as well as any future RME directives the Commission may require. EDI is currently live in Citizens' service territory, and EDI is expected to go live by June 1, 2015. As a result, the Companies are submitting this explanation of their plan to

² See *Investigation of Pennsylvania's Retail Electricity Market: End State Default Service*, Order, Docket No. I-2011-2237952, 303 P.U.R. 4th 28 (Feb. 15, 2013) ("End State Order").

³ See *in re Citizens' Elec. Co.*, 1999 WL 1331308 (Nov. 19, 1999); see also *in re Wellsboro Elec. Co.*, 1999 WL 1331308 (Nov. 19, 1999) (granting waivers of EDI implementation requirements until such time as 25% of Citizens' and Wellsboro's customers are engaged in competitive shopping).

⁴ *Joint Petition of Citizens' Electric Company of Lewisburg, PA and Wellsboro Electric Company for their Default Service Program for the period of June 1, 2015 through May 31, 2018*. Docket Nos. P-2014-2425024, *et al.*, Opinion and Order at 40-41 (Feb. 27, 2015).

implement seamless moves and instant connects in advance of Wellsboro's expected June 1st EDI launch.

II. IMPLEMENTATION PLAN

The Companies' EDI systems will be integral to implementing seamless moves and instant connects following development of Electronic Data Exchange Working Group ("EDEWG") Protocols and further direction from the PUC's Office of Competitive Market Oversight ("OCMO").⁵ Prior to development of the EDEWG Protocols, the Companies propose to implement seamless moves and instant connects using manual work-around procedures. In light of the small size of the Companies' service territories and the fact that no Electric Generation Suppliers ("EGSs") are actively marketing to residential customers in the territories, the Companies do not anticipate that a significant number of manual seamless moves/instant connects will be required between now and the EDI upgrade to automate the process.

As long as EDEWG acts timely to finalize the necessary Protocols, the Companies' vendor anticipates that it will be able to complete the EDI package update by the July 1, 2016, deadline.

The Companies will provide the Commission with further information as to the programming costs to implement automated seamless moves and instant connects following release of the EDEWG Protocols and OCMO findings. The Companies propose to collect those costs through the Customer Choice Support Charge ("CCSC") Riders that each Company recently implemented at Docket Nos. R-2014-2419774 and R-2014-2419776.

⁵ See *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 57 Regulations Regarding Standards for Changing a Customer's Elec. Generation Supplier*, Docket No. L-2014-2409393, Final-Omitted Rulemaking Order (Apr. 3, 2013).

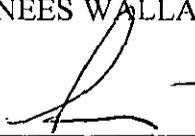
III. CONCLUSION

WHEREFORE, Citizens' Electric Company of Lewisburg, Pennsylvania and Wellsboro Electric Company respectfully request that the Pennsylvania Public Utility Commission accept this Joint Report as:

- (1) Compliant with the directives of the March 20, 2015 Secretarial Letter; and
- (2) Consistent with the reporting requirements for waiver granted in the Commission's February 27, 2015 Opinion and Order on the Companies' joint default service program at Docket Nos. P-2014-2425024 and P-2014-2425245.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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

Dated: April 20, 2015

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Citizens' Electric Company :
of Lewisburg, PA and : Docket Nos. M-2015-
Wellsboro Electric Company : M-2015-

VERIFICATION

I, Eric Winslow, President & CEO of Citizens' Electric Company of Lewisburg, PA, hereby state that the facts above set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

APRIL 20, 2015
Date

Eric Winslow
Signature

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Citizens' Electric Company :
of Lewisburg, PA and : Docket Nos. M-2015-_____
Wellsboro Electric Company : M-2015-_____

VERIFICATION

I, Craig Eccher, President & CEO of Wellsboro Electric Company, hereby state that the facts above set forth in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

4/20/15
Date


Signature

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