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May 11, 2015

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Temporary Waivers from Certain
Technical Requirements of 52 Pa. Code §§ 57.174 and 57.179 – Additional Waiver of
Non-Metered Account Multiple Off-Cycle Switching
Docket No. P-2014-2445072

Dear Secretary Chiavetta:

Please accept this answer on behalf of the Retail Energy supply Association (“RESA”)¹ in response to the Petition of PPL Electric Utilities Corporation (“PPL”) filed on April 20, 2015 seeking an additional waiver of the Commission’s regulations regarding accelerated switching.

RESA is a strong proponent of accelerated switching, is eager for accelerated switching to become a reality in Pennsylvania and appreciates the efforts of PPL (and other electric distribution companies, “EDCs”) to implement internal processes to comply with the Commission’s regulations requiring accelerated switching. Because of this, RESA has not generally opposed the waiver requests submitted by the EDCs. However, as expressed in previous filings, electric generation suppliers (“EGSs”) were not provided with a meaningful opportunity to offer input during the development phase of all of the EDC’s accelerated switching plans despite the fact that accelerated switching has significant operational, business process, contractual and hedging practice impacts for EGSs.² An unfortunate consequence of the manner in which the EDCs have chosen to implement accelerated switching is that there is no certainty regarding the actual date the customer will be switched and, therefore, no realistic way for an EGS to time an enrollment to ensure that a customer is not switched prior to a date certain (such as the date a current contract expires).

¹ The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

² See, e.g., RESA Letter to Rosemary Chiavetta dated November 10, 2014 at this docket.

This issue is newly created by the way in which the EDCs have chosen to implement accelerated switching. Prior to accelerated switching the customer could only be changed on his/her meter read date which established reasonable certainty for EGSs regarding when to submit an enrollment to the EDC. With accelerated switching, however, a customer may be switched anywhere between one and three business days. These two factors lead to a situation where the EGS does not have any realistic ability to ensure that a customer's switch will happen on a date definite. As such, a customer could face unnecessary early termination fees or other fees (i.e. liquidated damages fees for commercial customers).

Given this reality, RESA continues to remain concerned about the potential negative and unintended consequences that may flow from failing to at least consider the development of an Electronic Data Interchange ("EDI") process whereby EGSs would be permitted to select the enrollment date upon submission of the enrollment to the EDC.³ As the EDCs continue to implement accelerated switching, RESA maintains that at least considering the development of such an EDI process during these development phases is appropriate and would significantly improve the customer's experience of accelerated switching because (1) customers could select a future enrollment date that could be honored; (2) EGSs could better operationalize enrollment effective dates to ensure that they are honored; (3) customer dissatisfaction over the imposition of early termination fees imposed because of timing issues could be minimized; and, (4) customers could be enrolled as quick as possible while also ensuring that the 3 day rescission period is honored.

RESA understand that the Commission has not ordered the EDCs to consider the development of such EDI process previously and that the EDCs have generally opposed doing so. Even after considering the on-the-record stated opposition to RESA's proposal, RESA continues to believe that successful, long-term implementation of accelerated switching would be greatly improved if the Commission were to order that this issue be considered as implementation of permanent accelerated switching continues. In addition to all the reasons stated previously in support of this request, RESA offers the following for the Commission's consideration:

- Consideration and development of the EDI process would need to include all of the interested parties, including all the EDCs and EGSs to result in a standardized EDI process (and correspondingly changed EDEWG guidelines) available for all Pennsylvania consumers;
- While RESA has been raising this concern since the Commission first began considering accelerated switching, it is in the best interests of the public that the Commission remain open to considering this (or any other reasonable enhancement) that would improve the accelerated switching process for the long-term;

³ The initiation of new EDI processes is not novel. For example, through cooperation of the EDCs and EGSs, a new utility-initiated EDI 814 Move transaction is being developed to implement seamless moves. *See, e.g., EDC plan filings for Seamless Moves and Instant Connects*, Docket No. M-2014-2401103, PPL Electric Utilities Corporation Compliance Filing Plan for Implementing Seamless Moves and Instant Connects for Metered Accounts, filed April 20, 2015 at 6.

- RESA understands that any ability to request a future enrollment date via an EDI process does not transfer to the EDCs the responsibility to ensure that a customer's statutorily required rescission period is honored and that the EDCs would not be required to automatically hold the enrollment to allow the rescission period to lapse; and,
- Permitting this process does not need to disrupt the current "last in" priority system for enrollments because the priority can be based on when the enrollment request itself is received rather than on the specified date of enrollment.

While RESA does not oppose PPL's petition, for all the reasons stated above, RESA urges the Commission to direct all relevant parties (including all the EDCs and EGSs) to consider the development of an EDI process that would allow EGSs to specify the enrollment effective date. Such task could be assigned to and overseen by the Office of Competitive Market Oversight or the Electronic Data Exchange Working Group. RESA is concerned that a lack of direction from the Commission on this issue will lead to unnecessary difficulties for consumers and interested stakeholders in the future as accelerated switching is implemented on a long-term basis.

Sincerely,



Deanne M. O'Dell

cc: Per Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of foregoing letter response upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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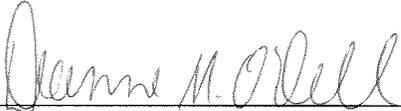
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