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October 8, 2015

VIA eFILING

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

Re: EDC Plan Filings for Seamless Moves and Instant Connects
Docket No. M-2014-2401085

Dear Secretary Chiavetta:

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

Sincerely,



W. Craig Williams
Assistant General Counsel

Enclosures

cc: Certificate of Service

service territories by July 1, 2016,” and (ii) include an estimate of costs to “design, test, implement and maintain seamless moves and instant connects,” as well as a proposal to recover those costs.⁴ Further, in the Tentative Order, the Commission directed PECO to file an “amended plan . . . that incorporates the modifications directed” by the Tentative Order, namely to clarify eligibility requirements for Seamless Moves and Instant Connects, gap/overlap days between old and new accounts in the eligibility requirements and cost recovery.⁵ In compliance therewith, this Amended Plan addresses those remaining issues, and PECO requests approval of the Amended Plan.

II. BACKGROUND

A. Regulatory Requirement

The Commission initiated an investigation into Pennsylvania’s retail electricity market in an Order entered April 29, 2011.⁶ 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.*⁷ The Commission therefore recommended that a second phase of the investigation be conducted by the Office of Competitive Market Oversight (“OCMO”).⁸

⁴ *Secretarial Letter*, at 3.

⁵ *Tentative Order*, at 13-14.

⁶ *See Investigation of Pennsylvania’s Retail Electricity Market*, Docket No. I-2011-2237952 (April 29, 2011).

⁷ *Final Order*, at 4-5.

⁸ *Id.* at 5.

One issue addressed in the second phase was the development of long-term structural changes to the default service model.⁹

In the Final Order, the Commission focused on, among other issues, the amount of time some customers spent on default service due to regulatory and administrative delays, when those customers already had an EGS or had selected an EGS in the course of establishing a new electric account with the default-service utility.¹⁰ Under previous switching rules and practices, the Commission noted that after a customer elected EGS service, that customer might spend between 16 and 45 days on default service while awaiting completion of the EGS enrollment.¹¹ 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 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.”¹²

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.”¹³ 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.”¹⁴

⁹ *Id.*

¹⁰ *See id.*, at 69-75.

¹¹ *Id.* at 69.

¹² *Id.*

¹³ *Id.* at 70.

¹⁴ *Id.*

In a related effort, on April 3, 2014, the Commission promulgated new regulations, which directed EDCs to develop 3-business day supplier switching.¹⁵ EDCs were ordered to implement the new 3-business day accelerated switching rules by December 15, 2014. PECO timely met this requirement by way of its Bill on Supplier Switch program and continues to report the success of this program to the Commission on a periodic basis.¹⁶

In light of the work being done then by EDCs to accomplish accelerated switching by December 15, 2014, the Commission permitted the EDCs to delay the development of instant connects and seamless moves if an EDC determined that developing these processes might delay or hinder the implementation of accelerated 3-day switching.¹⁷ In the Secretarial Letter of March 20, 2015, the Commission reiterated its commitment to implementing seamless moves and instant connects for customers with competitive suppliers and directed EDCs to file the instant revised plans to implement seamless moves and instant connects by July 1, 2016. The Commission also required EDCs to provide estimates of costs to design, test, implement and maintain seamless moves and instant connects, as well as the means by which EDCs would recover those costs.¹⁸

In the Tentative Order addressing PECO's plan to accomplish seamless moves and instant connects, the Commission directed PECO to file this Amended Plan to resolve issues involving the eligibility requirements and cost recovery through PECO's base rate case. With regard to the eligibility requirements, the Commission asked that PECO clarify the

¹⁵ See *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 57 Regulations Regarding Standards for Changing a Customer's Electricity Generation Supplier*, Docket L-2014-2409383 (entered April 3, 2014).

¹⁶ See *Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days in a Billing Period*, Docket No. P-2014-2446292 (Order entered December 4, 2014).

¹⁷ *Secretarial Letter, EDC Plan Filings for Seamless Moves and Instant Connects*, Docket No. M-2014-2401085 (August 13, 2014).

¹⁸ *Secretarial Letter*, at 3.

intent of the requirement that a “customer’s account must be in good standing with PECO.”¹⁹

The Commission also directed that the Amended Plan include a three-day gap/overlap limit in the eligibility requirements to address concerns raised by FirstEnergy Solutions (“FES”).

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 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.

¹⁹ *Tentative Order*, at 13-14.

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 (now not less than 3 business days in advance)²⁰ on the *pending active* account.²¹ 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 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. Following is a discussion of how PECO moves customers to or with their chosen supplier.

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

When a current PECO customer who 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.

²⁰ Three (3) business days advance notice is the minimum period required for the pending active account to qualify for Instant Connect. If the enrollment is not received 3 business days prior to enrollment, the enrollment will still be accepted on the pending active account, but it may not take effect on "Day 1."

²¹ Historically, PECO notes that about 28% of retail customers establishing new service contact PECO outside of the 3 business day window.

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. Further, in compliance with the accelerated switching rules implemented in December 2014, PECO effects the supplier change in 3 business days or less.²² Until the EGS begins service on the new account, PECO provides default service.

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 AMENDED 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.

²² See *PECO Energy Company Electric Generation Supplier Coordination Tariff, Supplement No. 22 to Tariff Electric Pa. P.U.C. No. 1S*, at § 5.3.1(b) (effective February 13, 2015) ("PECO EGS Tariff").

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.²³

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 account²⁴ and a connect date for the new account.²⁵ Consistent with the Tentative Order, at the time of

²³ 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.

²⁴ A "current account" is the account where the customer is presently located and has service today.

²⁵ A "new account" is the account that is not in service today, but will serve the customer's new location at a future date.

the customer's initial contact, a Seamless Move will not be allowed for any overlapping service or gaps in service lasting more than three business days.²⁶

- 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*²⁷ status in order to effectuate a seamless move.
- (PECO has removed the eligibility requirement that a customer must be in good standing for a seamless move. The Company was initially concerned that a customer with a delinquent balance might terminate service in one location and then use a seamless move or instant connect for a different account at the same or different location or under a different name to avoid the delinquency. However, the Company agrees that there are processes in place to deal with these possibilities that do not involve supplier choice through seamless moves or instant connects.)
- 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.

²⁶ Any customer initiated changes after the initial contact will be communicated to suppliers via existing, EDEWG-approved EDI transactions.

²⁷ 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.

In addition, customers must seamlessly move within the same rate class and same procurement class²⁸ 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.²⁹ At this time, only electric service is involved with seamless moves.³⁰

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.³¹ 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.

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

²⁸ 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. This comports with the recommendation of the EDEWG Stakeholder Subgroup and the request of the EGSs.

²⁹ Billing options may be changed upon request once the seamless move is complete.

³⁰ 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").

³¹ Although the move transaction has been proposed by the EDEWG Stakeholder Subgroup, PECO recognizes that the transaction will still go through the approval process.

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 when a new customer is placed on default service pending EGS enrollment.³² 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.³³ Similarly, the Commission also expressed that the “primary reason for wanting to pursue *instant connects* continues to be based on the concern expressed throughout this proceeding that the lack of *instant connects* – making all consumers first go on default service – inappropriately elevates default service to a favored, primary service role.”³⁴

Currently, PECO can accept an EGS enrollment only on *active* accounts. PECO accepts and incorporates into its Plan the recommendation of the EDEWG Stakeholder Subgroup 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).

³² *Final Order*, at 75.

³³ *Id.*

³⁴ *Secretarial Letter*, at 2.

When a customer contacts PECO to request a new connection, PECO will provide the new account number to the customer.³⁵ At that time, PECO will also provide the customer with information about EGS enrollment options. If the customer has already chosen an EGS, the 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 Program³⁶ (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.

PECO requires that the request must be received 3 business days in advance in order to effect an instant connect. The 3-business day notice is necessary to coordinate with PJM. If the enrollment request is not received 3 business days in advance of the connect date, the enrollment will follow the new accelerated switching rules.

³⁵ As discussed above for seamless moves, PECO has removed the eligibility requirement that a customer must be in good standing for an instant connect. The Company was initially concerned that a customer with a delinquent balance might terminate service in one location and then use an instant connect for a different account at a different location or under a different name to avoid the delinquency. However, the Company agrees that there are processes in place to deal with these possibilities that do not involve supplier choice through seamless moves or instant connects.

³⁶ This program is also referred to as the Standard Offer Program.

V. PLAN COSTS AND COST RECOVERY

In its Final Order and in the Secretarial Letter, the Commission directed the EDCs to include in their revised plans an estimation of costs for design, testing, implementation and ongoing maintenance of seamless moves and instant connects, as well as proposals for recovery of those costs.³⁷ PECO currently estimates the total cost to be approximately \$5.0 million, based on PECO's Amended Plan. As noted by the Commission in the Tentative Order,³⁸ PECO included recovery for the costs of implementing seamless moves and instant connects in its currently pending base rates case, for which PECO and the parties to that case have filed a comprehensive Joint Petition for Settlement.³⁹ The final determination of the amount of costs recovered for seamless moves and instant connects will be a part of the Commission's ruling upon PECO pending base rates case.

VI. SCHEDULE AND IMPLEMENTATION

PECO is fully committed to implementing seamless moves and instant connects by July 1, 2016. PECO will keep the Commission fully apprised of its progress and if, during the work period, any issues arise that might affect its ability to comply with the target date for implementation, PECO will notify the Commission promptly, describe the problems encountered, and lay out its plans to resolve those problems in a timely manner.

³⁷ *Final Order*, at 74-75; Secretarial Letter, at 3.

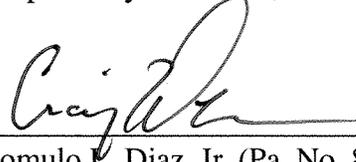
³⁸ *Tentative Order*, at 13.

³⁹ *Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division*, Docket No. R-2015-2468981 (filed March 27, 2015, Joint Petition for Settlement filed September 11, 2015).

VII. CONCLUSION

PECO respectfully requests that the Commission approve its Amended Plan For Accomplishing Seamless Moves and Instant Connects, as set forth herein.

Respectfully submitted,



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Date: October 8, 2015

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**EDC PLAN FILINGS FOR SEAMLESS :
MOVES AND INSTANT CONNECTS : DOCKET NO. M-2014-2401085
:
:**

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of PECO Energy Company's Amended Plan to the Revised 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:

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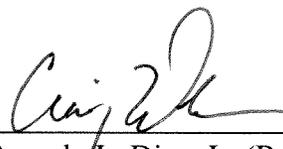
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