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OCT 12 2015

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Paul E. Russell  
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**FEDERAL EXPRESS**

October 12, 2015

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

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**RE: PPL Electric Utilities Corporation Plan for  
Seamless Moves and Instant Connects  
Docket No. M-2014-2401103  
PPL Electric Compliance Plan**

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is PPL Electric's Compliance Plan in the above-captioned proceeding. This Compliance Plan is being filed pursuant to the Pennsylvania Public Utility Commission's Final Order in this proceeding entered on October 1, 2015.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on October 12, 2015, which is the date it was deposited with an overnight express delivery service as shown on the delivery receipt attached to the mailing envelope.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding this Compliance Plan, please call me or Susan M. Scheetz, PPL Electric's Billing Specialist, at (484) 634-3228.

Sincerely,

A handwritten signature in black ink that reads "Paul E. Russell". The signature is written in a cursive, flowing style.

Paul E. Russell

Enclosure

cc: Tanya J. McCloskey, Esquire  
J. Edward Simms, Esquire  
Mr. John R. Evans

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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PPL Electric Utilities Corporation Plan for  
Seamless Move and Instant Connects  
Docket No. M-2014-2401103

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**PPL ELECTRIC UTILITIES CORPORATION  
COMPLIANCE PLAN**

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**Background**

On April 20, 2015, pursuant to a Secretarial letter from the Public Utility Commission ("PUC" or the "Commission"), PPL Electric Utilities Corporation ("PPL Electric") filed a Plan to implement Seamless Moves and Instant Connects in its service territory by July 1, 2016. On October 1, 2015, the Commission issued an Order approving PPL Electric's Plan for Seamless Moves and Instant Connects with several minor modifications ("Order"). In the Order, PPL Electric was directed to file within 10 days a compliance plan with the Commission that incorporates the modifications contained within the Order and to provide clarification on implementation. PPL Electric hereby submits its compliance plan to implement three specific items for modification and clarification, as described in more detail below. PPL Electric will modify the Plan it filed with the Commission on April 20, 2015, to include these three items.

### **Timeframe for Gaps or Overlap in Service**

On page 12 of its Order, the Commission references the Duquesne Light Order, specifically with regard to limiting any gap or overlap in service to three days for a Seamless Move. PPL Electric is developing computer programs and protocols to implement this limitation. However, PPL Electric's customer service experience has shown that three days may not be adequate and the Company is concerned that the three day limitation may exclude a large portion of customers that would otherwise benefit from the Seamless Move implementation and may result in *detrimental effects on customer satisfaction*. For example, PPL Electric has found that many customers moving out of one home to another often keep service at both locations (overlap in service) for more than three days in order to paint, clean, or remain in service while the home is on the real estate market. Gaps in service, as well, are often more than three days. It is not clear what specific business or customer reason supports the three-day limitation.

On page 12 of its Order, the Commission specifically states that this timeframe can be revisited if experience proves it to be problematic. PPL Electric is currently performing research to develop the timeframe that would be most beneficial to customers. Initial findings appear to support a gap or overlap timeframe closer to ten days. PPL Electric will provide its recommendation to the Commission after the research is completed and may, at that time, request that the Commission modify the Company's Compliance Plan to reflect the new timeframe.

### **Customer Communications**

On page 13 of its Order, the Commission references the Duquesne Light Order regarding an approach under which the Electric Distribution Company (“EDC”) will inform customers that their Electric Generation Supplier (“EGS”) supply service will seamlessly move to their new location assuming eligibility requirements are met. *If the seamless move eligibility requirements are met, PPL Electric will advise customers that their EGS supply service will seamlessly move to their new location and PPL Electric will send the move transaction to the EGS to notify it of the move and new account number and that no further customer action is required.*

### **Account Number**

On page 13 of its Order, the Commission asks for clarification on one aspect of PPL Electric’s plan for instant connects with regard to procedures on how or when the customer will obtain his or her new service location account number from PPL Electric to facilitate the instant connect. Currently, the customer is informed of his or her new account number in real time when the connect order is issued. PPL Electric will change its system to accept inbound enrollment requests on accounts that are not yet active to facilitate an instant connect. The customer will remain responsible for meeting PPL Electric’s requirements to activate the account and to contact the EGS to initiate supply service enrollment. The EGS will be responsible for submitting the enrollment request. PPL Electric will establish an estimated start date and will communicate that date on the enrollment response sent to the EGS. Any change or cancellation in the previously communicated estimated enrollment start date will be sent to the EGS from PPL Electric.

ORIGIN ID: ABEA (610) 774-4254  
PAUL E RUSSELL  
PPL CORPORATION  
2 N 9TH STREET

ALLENTOWN, PA 18101  
UNITED STATES US

SHIP DATE: 12OCT15  
ACTWGT: 1.00 LB  
CAD: 104308816/NET3670

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TO ROSEMARY CHIAVETTA, SECRETARY  
PA PUBLIC UTILITY COMMISSION  
400 NORTH ST  
COMMONWEALTH KEYSTONE BUILDING  
HARRISBURG PA 17120

539J3401A31D0

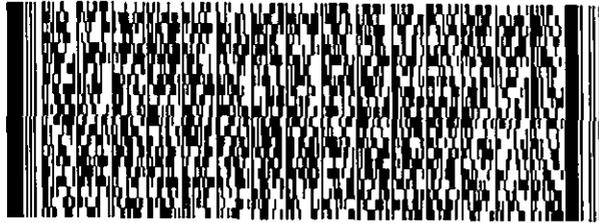
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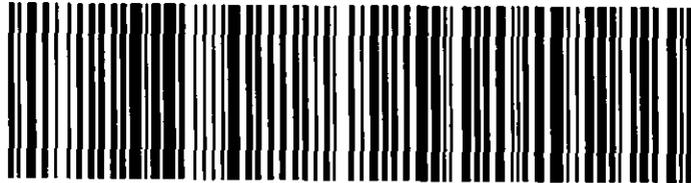
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