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May 9, 2016

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Direct Energy Services, LLC to Expand Retail Market Enhancements
Docket No. P-2016-2535033

Dear Secretary Chiavetta:

Enclosed for filing is the Answer of PPL Electric Utilities Corporation to the Petition of Direct Energy Services, LLC, in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Christopher T. Wright

CTW/jl
Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: May 9, 2016



Christopher T. Wright

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Direct Energy Services, LLC to : Docket No. P-2016-2535033
Expand Retail Market Enhancements :

ANSWER OF PPL ELECTRIC UTILITIES CORPORATION

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) files this Answer to the above-captioned Petition of Direct Energy Services, LLC (“Direct Energy”) pursuant to Section 5.61 of the Pennsylvania Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code § 5.61. In its Petition, Direct Energy requests that the Commission issue an expedited order that, among other things, “restarts” the previously postponed Retail Opt In (“ROI”) Program as a pilot program in the service territories of PPL Electric and PECO Energy Company (“PECO”). Although PPL Electric continues its full support of retail electric generation competition and applauds the Commission for its efforts to develop appropriate and reasonable initiatives to further develop the competitive market for retail electric generation supply, PPL Electric submits that the ROI Program as proposed by Direct Energy should be rejected for the many reasons stated below.

As a preliminary matter, it must be noted that Direct Energy’s proposed ROI Program is not a “restart” of the previously postponed ROI Program as alleged. Rather, as explained below, Direct Energy’s proposed ROI Program is an entirely new program that bears very little resemblance to the terms and conditions of the initial ROI Program previously considered and postponed by the Commission. Direct Energy’s request for an expedited, truncated process to

review the so-called “restart” of the ROI Program overlooks the Commission’s explicit requirement that the details of the ROI Program should be developed in each electric distribution company’s (“EDC”) individual default service proceeding. Direct Energy’s entirely new ROI proposal must be carefully and thoroughly evaluated to ensure it is reasonable, appropriately balanced, and properly recovers the costs from those entities that benefit from the program.

PPL Electric strongly supports the development of appropriate initiatives and measures to further encourage growth of the competitive retail electric generation supply market. Indeed, PPL Electric’s ongoing Standard Offer Program (“SOP”) was renewed in the last default service case and PPL Electric has proposed to continue the program in its pending default service case. The SOP has been highly successful in encouraging customers to shop. However, similar to the previously postponed ROI Program, PPL Electric has concerns that implementing a revised ROI Program at the same time as the ongoing SOP could lead to customer confusion, which could discourage customers from shopping under either program. Additionally, PPL Electric has concerns about the costs, implementation, and timing of the proposed ROI Program. Although these are the very same issues that lead the Commission to postpone the ROI Program, Direct Energy’s Petition fails to address any of these issues.

More importantly, Direct Energy’s proposed ROI Program seeks to add an entirely new component to the ROI Program that was never contemplated by the Commission or any other party. Unlike the commodity only product to be offered under the postponed ROI Program, Direct Energy seeks to include non-electric generation products and services as part of its proposed ROI Program. Direct Energy completely disregards that many electric generation suppliers (“EGSs”) licensed by the Commission do not and cannot offer any of the non-commodity products and services that Direct Energy seeks to include in its proposed ROI

Program. Such EGSs would not be eligible to participate in Direct Energy's proposed ROI Program. These EGSs would be at a competitive disadvantage under Direct Energy's proposed ROI Program as compared to Direct Energy and other EGSs that do offer non-commodity products and services. The ROI Program as proposed by Direct Energy could be discriminatory and anti-competitive among EGS licensed to do business in Pennsylvania.

Direct Energy also overlooks that many non-EGS entities provide the very same non-commodity products and services that Direct Energy seeks to include in its proposed ROI Program. Direct Energy and other EGSs that offer such non-commodity products and services are in direct competition with these non-EGS entities. However, these non-EGS entities would not be eligible to participate in Direct Energy's proposed ROI Program. Allowing Direct Energy and other EGSs to participate in the proposed ROI Program to market their non-commodity products and services directly to customers could give Direct Energy and other EGSs a significant and direct advantage in the competitive market for non-commodity products and services.

For these reasons, as further explained below, Direct Energy's proposal should be denied. In further support thereof, PPL Electric responds to each of the separately-numbered paragraphs of the Petition as set forth below.

ANSWER

1. Admitted in part and denied in part. It is admitted that Direct Energy is an EGS licensed by the Commission. PPL Electric is without sufficient knowledge to admit or deny the remainder of the averments set forth in Paragraph 1 of the Petition and, therefore, denies the same.

2. Admitted.
3. Admitted in part and denied in part. It is admitted that on April 29, 2011, the Commission initiated a statewide retail market investigation (“RMI”) “to ensure a properly functioning and workable competitive retail electricity market exists in the state.” See *Investigation of Pennsylvania’s Retail Electricity Market*, Docket No. I-2011-2237952, p. 2 (April. 29, 2011) (“*April RMI Order*”) (emphasis added). By way of further response, the stated purpose of the *April RMI Order* was to address the competitive market for retail electric generation supply. The *April RMI Order* did not address or otherwise relate to any non-electric generation products or services.
4. Admitted in part and denied in part. It is admitted that the Commission issued an Order on July 28, 2011, that directed the Office of Competitive Markets Oversight (“OCMO”) to initiate an investigation and provide recommendations and specific proposals for improvement of Pennsylvania’s “retail electric market.” See *Investigation of Pennsylvania’s Retail Electricity Market*, Docket No. I-2011-2237952, p. 13 (July 28, 2011) (“*July RMI Order*”). By way of further response, the stated purpose of the *July RMI Order* and the OCMO investigation, as well as the recommendations/proposals that followed, was to address the competitive market for retail electric generation supply. The *July RMI Order* did not address or otherwise relate to any non-electric generation products or services.
5. Admitted in part and denied in part. It is admitted that the Commission recommended design and guidelines for a ROI Program in an Order issued March 2, 2012. See *Investigation of Pennsylvania’s Retail Electricity Market*, Docket No. I-2011-2237952, (March 2, 2012) (“*Final RMI Order*”). Notably, however, Direct Energy’s proposed ROI Program is entirely different than and fails to comply with the Commission’s recommended ROI Program

design and guidelines. A few, but not all, of the major differences in the ROI Program recommended by the Commission and the ROI program proposed by Direct Energy are noted below:

	PUC Initial ROI Program	Direct Energy Proposed ROI Program
Proceeding	Individual DSP Proceedings	Expedited, Truncated non-DSP Proceeding
Eligibility	Residential	Residential and Small C&I
Pilot Program	No	Yes for PPL and PECO only
Length/Term	Four month 5% discount and 8 month fixed EGS offer	Twenty-four month 5% fixed discount
50% Customer Cap	Yes	No
Products Offered	Electric Generation Supply	Electric Generation Supply and non-electric generation products or services
Commission Jurisdiction	Over offers to provide electric generation supply	1. Over offers to provide electric generation supply 2. Require Commission to exercise jurisdiction over and certify non-electric generation products or services
Cost Recovery	To be addressed in DSP Proceedings	No specific proposal

It also is admitted that the Commission directed EDCs to include a ROI proposal in their individual default service plans. *See, e.g., Final RMI Order*, pp. 36, 105. Despite this clear direction, Direct Energy seeks to have its proposed ROI Program decided on an expedited basis through a truncated proceeding completely outside of the EDCs' default service proceedings. Direct Energy's proposed procedure is entirely at odds with the Commission's clear direction that the details of each ROI proposal should be addressed in each EDC's individual default proceedings.

The remainder of the averments in Paragraph 5 of the Petition regarding the Commission's statutory authority are conclusions of law to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same.

6. Admitted. It is admitted that the SOP was adopted through each EDC's default service proceeding as directed by the Commission's *Final RMI Order*. It also is admitted that

the SOP remains in place and continues to be available to both EGSs and customers that elect to participate in the program.

By way of further response, PPL Electric's SOP includes a web portal that permits customers to enroll in the SOP online and begin receiving electric generation supply from participating EGSs. PPL Electric's SOP has been highly successful with approximately 198,000 residential referrals and approximately 185,000 residential enrollments between August 2013 and March 31, 2016.

7. Admitted. It is admitted that the SOP approved by the Commission is a commodity only product. By way of further response, similar to the SOP, the ROI Program recommended by the Commission also was a commodity only program that did not include or otherwise authorize non-electric generation products or services.

8. Admitted in part and denied in part. It is admitted that the Commission directed that the details of the ROI proposals be developed in the EDC's individual default service plan proceedings. However, the Commission did not reach a final determination on the ROI Program proposed in PPL Electric's default service proceeding. By Order entered January 24, 2013, the Commission accepted, in part, and revised, in part, PPL Electric's ROI Program. *Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015*, Docket No. P-2012-2302074 (January 24, 2013). The Commission directed PPL Electric to meet with the parties and to submit revised terms and conditions applicable to the ROI Program for comments by other parties. However, after PPL Electric submitted its revised ROI Program, the Commission issued a Tentative Order stating that the ROI Programs proposed by various EDCs were postponed. *See Petition of PECO Energy Company, et al.*, Docket Nos. P-2012-2283641, *et al.*, (Final Order on Reconsideration

entered April 4, 2013). Thus, the Commission did not make a final determination regarding PPL Electric's proposed ROI Program.

9. Admitted in part and denied in part. It is admitted that the Commission postponed the ROI Programs proposed by various EDCs. It also is admitted that the Commission found that implementing both the SOP and ROI Program would cause customer confusion and implementation problems for EDCs. It is specifically denied, however, that the ROI Programs proposed by various EDCs were fully vetted as alleged in Paragraph 9 of the Petition.

By way of further response, despite the fact that the Commission previously found that implementing the ROI Program at the same time as the SOP could lead to customer confusion and implementation problems for EDCs, Direct Energy's Petition fails to address any of these issues. Stated otherwise, Direct Energy's Petition fails to plead with specificity any changes in facts or law that would warrant a departure from the Commission's conclusion regarding the customer confusion and implementation problems associated with the ROI Program. Indeed, Direct Energy's Petition is entirely silent on these issues.

Although PPL Electric strongly supports the development of appropriate initiatives and measures to further encourage the competitive retail electric generation market, PPL Electric has concerns that implementing the proposed ROI Program at the same time as the ongoing SOP could lead to customer confusion, which ultimately could discourage customers from participating in either program. PPL Electric also has serious concerns about the costs, implementation, and timing of the proposed ROI Program. If the Commission decides to move forward with consideration of Direct Energy's proposal, these issues need to be fully developed and carefully considered on the record through an appropriate proceeding.

10. Admitted. It is admitted that the SOP has been highly successful. PPL Electric incorporates Paragraph 6, *supra*, as though fully set forth herein. By way of further response, the success of the SOP attests to the Commission's wisdom in recognizing that simultaneously offering the SOP and ROI Program would cause customer confusion and implementation problems for EDCs, which ultimately could have resulted in lower participation levels.

11. Denied. The shopping statistics are reported monthly and are publicly available. The statistics speak for themselves. Therefore, any interpretation of or conclusions drawn from the shopping statistics is denied.

12. Admitted in part and denied in part. The statistics speak for themselves. Therefore, any interpretation of or conclusions drawn from the shopping statistics is denied.

By way of further response, PPL Electric acknowledges that the shopping statistics from July 2013 (when SOP started) are comparatively close to the shopping statistics from December 2015. However, Direct Energy overlooks that there was a significant decline in the shopping statistics after July 2013 (when the SOP started). The decline in shopping was largely the result of the polar vortex experienced in early 2014, EGSs' wide-spread use of variable rate contracts for competitive electric generation supply, and EGSs' marketing practices. Despite the significant decrease in shopping caused by these events, shopping has returned to level that is similar to the shopping that existed prior to these events.

13. Denied. The Commission approved SOPs were commodity only programs that did not include or otherwise authorize non-electric generation products or services. It also is denied that the Commission "hoped to see" or "envisioned" the development of non-electric generation products or services in its RMI directives as alleged by Direct Energy. Indeed, there is nothing in the *Final RMI Order* that addresses the development of non-electric generation

products or services. By way of further response, nothing prevents EGSs and non-EGSs from offering or marketing any non-electric generation products or services to electric customers.

14. Admitted in part and denied in part. The stated purpose of the Electricity Generation Customer Choice and Competition Act (“Choice Act”), 66 Pa.C.S. §§ 2801-2815, is to “create direct access by retail customers to the competitive market *for the generation of electricity.*” 66 Pa.C.S. § 2802(12) (emphasis added). PPL Electric agrees that certain non-electric generation products or services may be beneficial to consumers. However, these non-commodity products and services are not part of the competitive market for retail electric generation supply authorized by the Choice Act. Indeed, such products and services are offered by numerous entities, including non-EGS entities that do not participate in the competitive market for retail electric generation supply. EGSs that offer non-commodity products and services are not only in competition with other EGSs that offer similar products, they also are in competition with non-EGS entities that offer these products.

By way of further response, many non-EGS entities offer and provide the very same non-commodity products and services that Direct Energy seeks to include in its proposed ROI Program. Direct Energy and other EGSs that offer such non-commodity products and services are in direct competition with these non-EGS entities. However, these non-EGS entities would not be eligible to participate in Direct Energy’s proposed ROI Program. These non-EGS entities could be at a competitive disadvantage under the proposed ROI Program as compared to Direct Energy and other EGSs participating in the ROI Program.

In further response, it also should be noted that not all EGSs offer non-electric generation products or services. There are all types and sizes of EGSs licensed to offer competitive retail electric generation supply to customers in Pennsylvania. Although some EGSs

may offer non-electric generation products or services, many EGSs do not. Under Direct Energy's proposed ROI Program, EGSs that do not or cannot offer non-electric generation products or services would not be eligible to participate in the ROI Program. These EGSs would be at a competitive disadvantage under the proposed ROI Program as compared to Direct Energy and other EGSs that do offer non-commodity products and services. The ROI Program as proposed by Direct Energy could be discriminatory and anti-competitive among EGSs licensed to do business in Pennsylvania.

15. Denied. Throughout its petition, Direct Energy repeatedly states that the postponed ROI Program should be "restarted." However, as explained in Paragraph 5, *supra*, Direct Energy's proposed ROI Program is not a restart of the postponed ROI Program; it is an entirely new ROI Program that has vastly different terms, conditions, and products that were not considered by the Commission during its retail market investigation and were not proposed and evaluated during any of the EDCs' default service proceedings.

PPL Electric fully supports retail electric generation competition and applauds the Commission for its efforts to develop appropriate and reasonable initiatives to further encourage shopping. However, Direct Energy's proposed ROI Program could result in a competitive disadvantage to those EGSs and non-EGS entities that are unable to participate in the proposed ROI Program.

Finally, any "confidence lost" in the retail electric marketplace as alleged by Direct Energy is primarily due to the polar vortex, some EGSs' use of variable rate contracts for competitive electric generation supply, and some EGSs' marketing practices -- not the absence of the postponed ROI Program.

16. Denied. PPL Electric incorporates Paragraph 14, *supra*, as though fully set forth herein. By way of further response, PPL Electric has concerns that implementing the proposed ROI Program at the same time as the ongoing SOP could lead to customer confusion, which could discourage customers from participating in either program. The proposed ROI Program and SOP program have similar intent and terms that also are similar. While there are differences between the proposed ROI Program and the SOP, the potential exists for significant customer confusion and adverse comparisons between the programs. PPL Electric also has concerns regarding the implementation of the ROI Program as proposed by Direct Energy. Under Direct Energy's proposed ROI Program, EDCs would have to open up their bills for all providers of non-electric generation services and products, not just EGSs, to avoid allegations of discriminatory treatment. Further, Direct Energy's proposal raises significant concerns related to uncollectibles, Purchase of Receivables, consolidated billing, and the "all or none" protections design to discourage EGSs from "cherry-picking" customers. Despite the fact that both potential for customer confusion and EDC implementation were the very same issues that led the Commission to suspend the ROI Program, Direct Energy's Petition fails to address any of these issues or concerns. PPL Electric submits that if the Commission decides to consider any proposed ROI Program, that Program should be thoroughly vetted through the EDC's individual default services plans, as originally directed by the Commission in its *Final RMI Order*, to ensure that these issues are properly addressed.

In further response, PPL Electric responds to each of the terms of Direct Energy's proposed ROI Program as follows:

- (i) Direct Energy's proposed ROI Program is not available to all licensed EGSs. Rather, Direct Energy's proposed ROI Program would be available

only to those EGSs that offer non-electric generation products or services. Not all EGSs offer such products and services, and those EGSs would not be eligible to participate in Direct Energy's ROI Program. These EGSs could be a competitive disadvantage under Direct Energy's ROI Program as compared to Direct Energy and other EGSs that do offer non-commodity products and services. Thus, the ROI Program as proposed by Direct Energy could be discriminatory and anti-competitive among EGS licensed to do business in Pennsylvania.

- (ii) The proposed mailing to describe the proposed ROI Program would be very costly. PPL Electric estimates that it would cost a minimum of \$1.0 million to implement the proposed one-time mailing. If an ROI Program is adopted, recovery of the costs for the proposed mailing should be carefully and thoroughly considered to ensure that the EDCs can recover the costs of the program on a full and current basis and that those who benefit from the ROI Program are paying all of the associated costs. Similar to the SOP, the true beneficiaries of an ROI Program will be the EGSs. Therefore, similar to the SOP, PPL Electric recommends that the EGSs be responsible to bear all the costs associated with any ROI Program, if approved. In no event should any costs of an ROI Program be passed on to any non-shopping customers that do not participate or otherwise benefit from the ROI Program.
- (iii) Direct Energy's proposal that the EDC mailing include all participating EGSs, a description of each individual EGS's non-electric generation

products or services, and each EGS's marketing material would be extremely burdensome and costly. This proposal would result in a very voluminous mailing that would further increase the costs of the program, above PPL Electric's initial estimates. In addition, PPL Electric is concerned that such a voluminous mailing would be very confusing to customers.

- (iv) PPL Electric agrees that if an ROI Program is adopted, customers should be free to select one of the participating EGSs. However, PPL Electric has concerns about Direct Energy's proposal that the EDC should randomly select an EGS for customers that participate in the ROI Program but do not select an EGS. The primary concern is that Direct Energy's proposed ROI Program includes non-electric generation products or services that will differ among participating EGSs. Direct Energy's proposal that EDCs randomly select an EGS in the ROI Program would essentially put the EDC in the position of selecting which non-electric generation products or services that customers participating in the ROI Program will receive. This proposal is problematic because the customer may have little to no interest in the non-electric generation products or services that have been randomly selected.
- (v) PPL Electric agrees that EGSs should be free to market both their electric generation and non-electric generation products or services at their own cost.

- (vi) PPL Electric agrees that if an ROI Program is adopted, EGSs should be pre-approved by the Commission to provide an electric generation supply product under the ROI Program. However, the terms and conditions of the ROI Program should first be fully vetted and developed through the EDC's individual default services plans as originally directed by the Commission in its *Final RMI Order*.

By way of further response, if the Commission adopts an ROI Program, the term should not be 24 months as proposed by Direct Energy. As explained by the Commission when it previously considered and rejected a 24-month term for the postponed ROI Program, long-term ROI programs are risky and shorter terms may help protect against the unpredictability of the market and lessen the risk premiums that suppliers incorporate into their prices. *See Final RMI Order*, p. 50.

In further response, any ROI Program approved by the Commission should not include any non-electric generation products or services as proposed by Direct Energy. As explained above, Direct Energy's proposed ROI Program raises discriminatory and anti-competitive issues among EGSs, and could give Direct Energy and other EGSs a significant and direct advantage in the competitive market for non-commodity products and services.

- (vii) PPL Electric incorporates Paragraph 16(vi), *supra*, as though fully set forth herein.

- (viii) PPL Electric incorporates Paragraph 16(vi), *supra*, as though fully set forth herein.
- (ix) PPL Electric agrees that if an ROI Program is adopted, it should be strictly voluntary for customers. However, any such ROI Program should be limited solely to residential customers because, as previously explained by the Commission, there is no consistency among EDCs in defining small commercial customers and it would be inappropriate to include a segment of customers that may reflect a wide variation in electric load. *See Final RMI Order*, p. 42.
- (x) If an ROI Program is adopted, recovery of the costs of the proposed mailing should be carefully and thoroughly considered to ensure that the EDCs can recover the costs of the program on a full and current basis and that those who benefit from the ROI Program are paying all of the associated costs. Similar to the SOP, the true beneficiaries of an ROI Program will be the EGSs. Therefore, similar to the SOP, PPL Electric recommends that the participating EGSs be responsible to bear all the costs associated with any ROI Program approved. In no event should any costs of a ROI Program be recovered through a non-bypassable surcharge as suggested by Direct Energy. Additionally, no costs of a ROI Program should be passed on to any shopping or non-shopping customers that do not participate in or otherwise benefit from the ROI Program.
- (xi) Direct Energy's proposal to eliminate the 50% customer participation cap should be rejected. As previously explained by the Commission when it

rejected Direct Energy's very same proposal, "a lack of a cap on customer participation would provide no estimate of customer participation to both wholesale and retail suppliers. We believe the 50% cap provides both a large customer participation pool, while providing some level of certainty to those EGSs opting to participate in the [ROI Program]." *Final RMI Order*, p. 59. Notably, Direct Energy has not articulated any reason to depart from the conclusion reached by the Commission. Thus, in the event an ROI Program is adopted, it should include the 50% customer participation cap for the reasons previously stated by the Commission.

- (xii) Direct Energy proposes that all other limitations and guidelines previously recommended by the Commission in the postponed ROI Program should be applied to the "restart" of ROI Program. PPL Electric agrees that appropriate measures and limitation should be thoroughly considered and applied to all measures and initiatives designed to promote competition in the retail electric generation market, including a ROI Program if approved. However, Direct Energy's proposed ROI Program is not a "restart" of the postponed ROI Program as alleged. Rather, as explained in Paragraph 5, *supra*, Direct Energy's proposal is an entirely new program with completely different terms and conditions, including the attempt to incorporate non-electric generation services and products.
- (xiii) Direct Energy proposes the ROI Program be implemented as a pilot program in the PPL Electric and PECO service territories. However, the Commission previously rejected implementing the ROI Program as a pilot

program. PPL Electric submits that, if any ROI Programs are to be adopted, they should first be carefully reviewed and considered in the EDCs' individual default service proceedings as originally directed by the Commission.

17. Denied. The averments in Paragraph 17 of the Petition are conclusions of law, to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same.

18. Denied. The averments in Paragraph 18 of the Petition are conclusions of law, to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same.

19. Denied. The averments in Paragraph 19 of the Petition are conclusions of law, to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same.

20. Denied. The averments in Paragraph 20 of the Petition are conclusions of law, to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same.

21. Denied. Although the Commission previously recommended and considered the postponed ROI Program, said ROI Program did not include any non-electric generation services and products. Not only is Direct Energy's proposed ROI Program an entirely different program, Direct Energy's proposed ROI program raises discriminatory and anti-competitive issues. PPL Electric incorporates Paragraphs 5, 14, and 16, *supra*, as though fully set forth herein.

22. Denied. As explained above, the ROI Program as proposed by Direct Energy raises discriminatory and anti-competitive issues among both EGs and non-EGs. PPL Electric incorporates Paragraphs 5, 14, and 16, *supra*, as though fully set forth herein.

23. Denied. PPL Electric incorporates Paragraph 22, *supra*, as though fully set forth herein.

24. Denied. The averments in Paragraph 24 of the Petition are conclusions of law, to which no responsive pleading is required. To the extent a response is deemed necessary, PPL Electric denies the same. By way of further response, PPL Electric incorporates Paragraphs 5, 14, and 16, *supra*, as though fully set forth herein.

In further response, Direct Energy's contention that the non-electric generation services and products to be included in its proposed ROI Program may supplement the EE&C programs under Act 129 suggests that any such programs should be addressed, if appropriate, within the context of the individual EDC's Act 129 proceedings.

25. Admitted in part and denied in part. It is admitted that the Commission expressly required that the details of the ROI proposals should be developed in each EDC's individual default service proceeding. It is denied, however, that this process has been completed or that a full record has been created. By way of response, PPL Electric incorporates Paragraph 8, *supra*, as though fully set forth herein. In further response, Direct Energy's proposed ROI Program is an entirely new program that bears very little resemblance to the terms, conditions, and even products that were initially considered in the postponed ROI Program. PPL Electric incorporates Paragraph 5, *supra*, as though fully set forth herein. No record has been developed on Direct Energy's new proposed ROI Program.

Direct Energy proposes that any EDC that wishes to raise issues or concerns with the proposed ROI Program can do so in the compliance filing to “be filed in response to a final order by the Commission granting Direct Energy’s request.” Not only is the procedure proposed by Direct Energy too late, it would essentially deny EDCs any meaningful opportunity to be heard or otherwise participate in this proceeding. Direct Energy’s attempt to deny EDCs their due process rights must be rejected.

Additionally, although Direct Energy may agree with its own marketing plan under the proposed ROI Program, it is entirely unclear if Direct Energy’s approach is acceptable to other EGSs. Because no record has been created for Direct Energy’s new ROI Program, it is entirely unknown whether other EGSs may have different views and proposals to implement a reasonable and balanced ROI Program -- particularly those EGSs that do not offer non-generation products and services and could be placed at a significant competitive advantage if Direct Energy’s proposed ROI is adopted. Rather than simply adopting Direct Energy’s preferred marketing plan, these EGS issues and concerns should be fully developed through an on the record proceeding.

26. Denied. The Commission unequivocally directed that the details of the ROI Program should be developed in each EDC’s individual default service proceeding. *See, e.g., Final RMI Order*, pp. 36, 105. The current default service contracts were procured without an ROI Program in place. The final design of the proposed ROI Program, if adopted, clearly could impact existing default service plans and contracts. Therefore, to avoid the risk of adversely affecting current default supply contracts, any ROI Program should be developed and carefully reviewed in each EDC’s individual default service proceeding as previously directed by the Commission.

Direct Energy's attempt to characterize its proposal as a simple "restart" of the postponed ROI Program is not accurate. As explained above, Direct Energy's proposed ROI Program is an entirely new program that bears little resemblance to the postponed ROI Program. Direct Energy's so-called "restart" is nothing more than an attempt to skip an essential step that was expressly required by the Commission, *i.e.*, that the details of the ROI Program should be developed in each EDC's individual default service proceeding.

27. Denied. Direct Energy's request for a blanket waiver fails to plead sufficient facts to establish even a *prima facie* case for a waiver and, therefore, Direct Energy's requested blanket waiver should be denied.

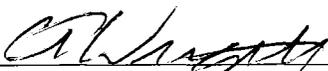
CONCLUSION

Based on the foregoing, Direct Energy's proposed ROI Program is an entirely new program that bears no resemblance to the terms and conditions of the initial ROI proposal previously considered and suspended by the Commission. Further, Direct Energy's proposed ROI Program raises serious discriminatory and anti-competitive issues among both EGSs and non-EGSs as explained above. Although PPL Electric supports retail electric generation competition and applauds the Commission for its efforts to develop appropriate and reasonable initiatives to further promote the competitive market for retail electric generation, Direct Energy's proposal should be rejected for the many reasons stated herein.

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Retail Opt In Program as proposed by Direct Energy Services, LLC be denied in its entirety.

Respectfully submitted,

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Date: May 9, 2016

Counsel for PPL Electric Utilities Corporation

VERIFICATION

I, Bethany L. Johnson, being the Manager of Regulatory Operations at PPL Electric Utilities Corporation, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect PPL Electric Utilities Corporation 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.

Date:

5/9/2016

Bethany L. Johnson
Bethany L. Johnson