



February 22, 2017

**Via Electronic Filing**

Rosemary Chiavatta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, Pennsylvania 17120

Re: PAPUC Docket No. P-2016-2579249

Dear Secretary Chiavatta:

Please find enclosed reply comments of the American Coalition of Competitive Energy Suppliers ("ACCES"), in response to the Pennsylvania Public Utility Commission's ("PAPUC") request for comment regarding the consideration of NRG Energy's petition for the PAPUC to allow electric supplier consolidated billing, docketed at P-2016-2579249.

Thank you in advance for your time and consideration. Please do not hesitate to contact our office with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "Suzanne Graziano-Publicover".

Suzanne Graziano-Publicover  
Regulatory Consultant  
American Coalition of Competitive Energy Suppliers

Enclosure

cc: ACCES members (via e-mail)  
Karen Moury, Counsel for NRG (via e-mail)  
Office of Consumer Advocate (via e-mail)  
Office of Small Business Advocate (via e-mail)  
PUC Bureau of Investigation and Enforcement (via e-mail)



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF NRG ENERGY, INC. FOR  
IMPLEMENTATION OF ELECTRIC GENERATION  
SUPPLIER CONSOLIDATED BILLING**

**Docket No. P-2016-2579249**

The American Coalition of Competitive Energy Suppliers (“ACCES”) appreciates the opportunity to provide reply comments in the matter of the Pennsylvania Public Utility Commission’s (“PAPUC” or “Commission”) consideration of Docket No. P-2016-2579249, regarding NRG Energy Inc.’s (“NRG Energy”) petition for the PAPUC to allow electric supplier consolidated billing (“SCB”).

ACCES is a group of competitive electricity and natural gas suppliers committed to helping consumers better understand and take advantage of the benefits of energy choice and competition in the energy industry. As an organization, ACCES is solely focused on developing and delivering consumer education resources, in partnership with public service commissions, consumer advocates, utilities, and other suppliers. At least five of our members are currently active electric generation suppliers in Pennsylvania, but all of our members are committed to consumer education in every competitive market in the country. ACCES’s efforts are solely focused on consumer education, and do not include advocacy, sales, or marketing activities.

The reply comments below focus primarily on providing suggestions as well as offering ACCES’ resources and tools on the topic of enhancing consumer education on supplier consolidated billing in Pennsylvania, should the PAPUC choose to allow this option.

ACCES does not take an official position on supplier consolidated billing; however, as our mission is consumer education, we do believe that providing easier-to-read, more user-friendly billing invoices would be beneficial to consumers. Energy choice provides



Pennsylvania residents and businesses the opportunity to identify and select the products and services that best meets their energy needs to power, heat and cool their homes, apartments and businesses. Benefits that consumers are focused on, such as the security that comes with a fixed-rate product, the ethical value of a renewable energy offer, or the additional benefits that can be provided by a competitive supplier, such as a home-warranty service or technology products like a smart thermostat can be more clearly provided to a customer through consolidated billing. Ultimately, an educated consumer base which understands the full range of energy choices available and can make informed decisions on their own behalf is vital to strengthening the overall energy market.

### **Consumer Education Crucial to Any Implementation of SCB**

Comments filed by several stakeholders indicate a belief that implementation of SCB could result in significant customer confusion. The joint comments of Citizens and Wellsboro note that “SCB could have the inverse effect, making it more difficult for customers to understand and navigate their electricity service.”<sup>1</sup> The Office of Consumer Advocate submits that customer education would have to be addressed in the event of SCB implementation, specifically relating to service quality concerns, shopping and participation in the marketplace, and outage emergencies.<sup>2</sup> It is the position of ACCES that with properly-designed-and-implemented consumer education, consumers could understand SCB and the commensurate changes to their relationships with their utility and their EGS. Should the Commission choose to move forward with supplier consolidated billing, ACCES recommends providing educational content on the PAPowerSwitch website to ensure consumers are familiar with any new billing formats and procedures. For its part, ACCES could assist in the development of additional educational materials, to make available not only to consumers directly on our website, but also available free of charge

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<sup>1</sup> [Joint Comments of Citizens’ Electric Company of Lewisburg, PA and Wellsboro Electric Company](#), 1/23/17, pg. 7

<sup>22</sup> [Comments and Answer of Office of Consumer Advocate](#), 1/23/17, pg. 22



for use by the PAPUC, Office of Consumer Advocate, Office of Small Business Advocate and other approved organizations. ACCES pledges to provide its full range of educational materials to the PAPUC in order to ensure that consumers are aware of changes to their billing format and understand the terms of their service agreements, guaranteeing they are informed customers. We are pleased to offer the Commission full access to, and use of, all of our content, resources, and tools are available at no charge with all of the ACCES branding removed. We can work with Staff to tailor the resources and content to fit the specific needs of the Pennsylvania market, specifically, the adoption of supplier consolidated billing.

### **Conclusion**

ACCES strongly believe that robust consumer education is vital to the long-term success of the marketplace. We look forward to continuing this discussion with interested parties regarding advancing electric choice in Pennsylvania for the benefit of all consumers. Please do not hesitate to contact us with any questions or concerns regarding our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Frank Caliva, III".

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Frank Caliva, III  
Regulatory Consultant  
American Coalition of Competitive Energy  
Suppliers  
President  
P.R. Quinlan Associates Inc.  
1012 14<sup>th</sup> Street NW, Suite 903  
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Suzanne Graziano-Publicover  
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