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File #: 140056

February 22, 2017

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 NRG Energy, Inc. for Implementation of Electric Generation Supplier
Consolidated Billing - Docket No. P-2016-2579249**

Dear Secretary Chiavetta:

Enclosed for filing please find the Reply Comments of PPL Electric Utilities Corporation in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Devin Ryan

DTR/jl
Enclosures

cc: Certificate of Service

CERTIFICATE OF SERVICE

(Docket No. P-2016-2579249)

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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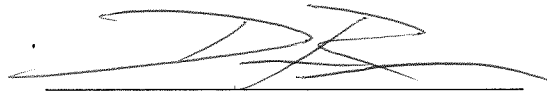
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Date: February 22, 2017



Devin T. Ryan

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of NRG Energy, Inc. for :
Implementation of Electric Generation : Docket No. P-2016-2579249
Supplier Consolidated Billing :

**REPLY COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby submits these Reply Comments, which respond to the comments filed by: (1) the Retail Energy Supply Association (“RESA”); and (2) Direct Energy Services, LLC (“Direct Energy”) concerning NRG’s Petition for Implementation of Electric Generation Supplier Consolidated Billing (“Petition”). In support thereof, PPL Electric states as follows:

I. REPLY COMMENTS

The large majority of commenters, including PPL Electric, oppose NRG’s Petition to implement supplier consolidated billing (“SCB”). Indeed, very few commentators, such as RESA and Direct Energy, actually support NRG’s proposal. Although PPL Electric already has outlined the various factual, legal, and policy issues with NRG’s proposal, the Company submits these limited Reply Comments to correct and respond to certain statements made by RESA and Direct Energy.

First, RESA mistakenly avers that “only the electric distribution companies (‘EDCs’) can bill retail customers” and that utility consolidated billing (“UCB”) is the “exclusive” billing

option currently available. (RESA Comments, pp. 2-3, 8-10) In fact, there are two billing options: (1) UCB, where the EDC issues a single consolidated bill; and (2) dual billing, where the EDC and the electric generation supplier (“EGS”) issue separate bills to customers for their respective charges. *See* 66 Pa. C.S. § 2807(c); 52 Pa. Code §§ 54.4(b)(8)-(9). At present, dual billing is an available and utilized billing option; multiple suppliers currently participate in dual billing in PPL Electric’s service territory. Thus, UCB is not the exclusive billing option for customers, as RESA alleges.

Second, RESA and Direct Energy only focus on UCB and wholly fail to address dual billing in their comments. (*See* RESA Comments, pp. 1-13; Direct Energy Comments, pp. 1-5). Indeed, RESA and Direct Energy attempt to support NRG’s proposal without recognizing that dual billing already provides many of the benefits that they cite for implementing SCB. (*See* PPL Electric Comments, p. 9) For example, dual billing affords EGSs the opportunity to bill customers directly for their electric generation supply service, provides the benefits of regular customer contact and, to the extent waivers of Commission regulations or orders are needed, may enable EGSs to bill for value-added services. (*See* PPL Electric Comments, p. 9) Therefore, no need exists to undergo the arduous and costly process of developing and implementing SCB.

For these reasons and those set forth in PPL Electric’s Answer and Comments, NRG’s Petition should be denied.

II. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation respectfully requests that the Pennsylvania Public Utility Commission deny NRG Energy, Inc.'s Petition for Implementation of Electric Generation Supplier Billing, as set forth in the Company's Answer to the Petition, Comments on the Petition, and these Reply Comments.

Respectfully submitted,



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Date: February 22, 2017

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