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January 22, 2019

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company For Approval of Their Default Service Programs***  
**Docket Nos. P-2017-2637855; P-2017-2637857; P-2017-2637858;**  
**P-2017-2637866**

Dear Secretary Chiavetta:

Enclosed for filing please find the Comments of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company in the above-referenced matter.

As indicated on the attached Certificate of Service, copies have been served on the parties in the manner indicated.

Please contact me with any questions regarding this matter.

Very truly yours,

*Teresa K. Harrold* /KBR

Teresa K. Harrold

Enclosures

c: As Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Petition of Metropolitan Edison</b>	<b>:</b>	
<b>Company, Pennsylvania Electric</b>	<b>:</b>	<b>Docket No. P-2017-2637855</b>
<b>Company, Pennsylvania Power Company</b>	<b>:</b>	<b>P-2017-2637857</b>
<b>and West Penn Power Company for</b>	<b>:</b>	<b>P-2017-2637858</b>
<b>Approval of their Default Service</b>	<b>:</b>	<b>P-2017-2637866</b>
<b>Programs</b>	<b>:</b>	

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**COMMENTS OF METROPOLITAN EDISON COMPANY,  
PENNSYLVANIA ELECTRIC COMPANY, PENNSYLVANIA POWER  
COMPANY, AND WEST PENN POWER COMPANY**

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**I. INTRODUCTION**

On September 4, 2018, the Pennsylvania Public Utility Commission (“Commission”) issued a Final Order approving the proposed default service programs (“DSPs”) of Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”), and West Penn Power Company (“West Penn”) (collectively, “Companies”) for the period June 1, 2019 through May 31, 2023.<sup>1</sup> As part of the Final Order, the Commission ordered its Office of Competitive Market Oversight (“OCMO”) to hold a working group meeting to develop electric shopping rules for customers enrolled in the Companies’ Pennsylvania Customer Assistance Program (“PCAP”) and to further evaluate appropriate customer referral program (“CRP”) scripting. The working group meeting was held on November 5, 2018, and included broad participation from the Companies, electric generation suppliers (“EGSs”), and customer advocates. On December 20, 2018, the Commission issued a Tentative Order proposing PCAP shopping rules and CRP scripting changes for the Companies.

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<sup>1</sup> The Final Order was subject to reconsideration and amended by Commission Order dated November 1, 2018 at the above-referenced proceeding to clarify that the Companies’ shopping customers enrolled in the Pennsylvania Customer Assistance Program may be charged no more than the currently-effective price-to-compare and to identify certain additional transitional rules applicable to the Companies’ shopping customers.

On balance, the Companies support the Commission's recommendations in the Tentative Order related to both PCAP shopping and CRP scripting. The Commission correctly recognizes that EGSs should be required to offer PCAP customers a rate-ready percentage-off price-to-compare ("PTC") product.<sup>2</sup> The Tentative Order also identifies implementation procedures related to the PCAP shopping changes that are workable and reasonable, such as the Companies updating their sync lists and eligible customer lists to include PCAP participation flags. With respect to CRP scripting, the Companies are capable of modifying their scripting to reflect the language used prior to June 1, 2017.

The Companies recommend that the Commission adopt the Tentative Order subject to only minor modification related to a single discrete item, as explained in detail in the comments below. The Companies also offer in these comments certain clarifications requested by the Commission within the Tentative Order.

## **II. COMMENTS**

### **A. EGSs may offer both rate-ready and bill-ready products to customers.**

In the Tentative Order, the Commission finds that EGSs may only offer rate-ready percentage-off PTC products to PCAP customers.<sup>3</sup> However, the Commission also recognizes that the same EGSs may seek to offer bill-ready products to non-PCAP customers, and asks that the Companies clarify whether an EGS may offer both rate-ready and bill-ready options to customers in the Companies' service territories.<sup>4</sup> The Companies confirm that EGSs may offer both bill-ready and rate-ready products to different customers. In order to begin offering bill-ready or rate-

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<sup>2</sup> In the Tentative Order, the Commission correctly recognizes that the Companies' sister Ohio utilities utilize rate-ready percentage-off PTC functionality. Tentative Order, fn 4. As a point of clarification, however, the Companies will still need to program the automatic rejection of EGS enrollments at prices above the PTC, which will result in the Companies incurring additional programming costs.

<sup>3</sup> Tentative Order, pp. 8-9.

<sup>4</sup> *Id.* at 10.

ready products, the EGS must work with the Companies to conduct electronic data interchange (“EDI”) testing related to the new billing type. Once the EDI testing is complete for each billing type, the EGS may offer one or both types of billing.

**B. The Commission should clarify that the 30-day EDI testing requirement exclusively applies to EGSs who are currently certified for bill-ready billing.**

In order to ensure that EGSs interested in serving PCAP customers have an opportunity to adopt rate-ready billing functionality, the Commission is recommending that for the three-month periods before and after June 1, 2019, the Companies’ EDI testing for rate-ready billing should occur in 30 days.<sup>5</sup> The Companies do not oppose this recommendation subject to a limited modification. Where an EGS is already certified to offer bill-ready billing, 30-day EDI testing to certify the EGS for rate-ready functionality is feasible. However, the Companies should not be held responsible for any EGS delay in turning around the EDI transactions during the testing which prevents the Companies from meeting this 30-day testing requirement. In addition, new EGSs to the Companies’ territories that have yet to establish a billing interface with the Companies may take longer than 30 days to certify for rate-ready billing. This is because the initial setup associated with certifying an EGS for billing purposes is significantly more time-intensive than certifying an EGS for rate-ready billing who is already certified for bill-ready billing. Accordingly, the Companies request that the Commission clarify within its Final Order that the 30-day EDI testing requirement only applies to EGSs who are already certified to offer bill-ready billing and are seeking to obtain rate-ready functionality, and that the EGSs are responsible for meeting all deadlines set by the Companies for carrying out those testing protocols.

**C. The Companies plan to file revised supplier tariffs once final PCAP shopping rules are adopted.**

The Commission seeks comments from stakeholders regarding whether the Companies’

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<sup>5</sup> *Id.* at 9-10.

supplier tariffs should be revised to reflect the new PCAP shopping rules.<sup>6</sup> The Companies intend to make compliance filings, including revised supplier tariffs, that reflect the changes approved by the Commission as part of this proceeding.

**D. The Companies have a number of methods for communicating the current PTC to EGSs.**

As part of the Tentative Order, the Commission requests that the Companies identify how they will notify EGSs regarding the quarterly changes to the PTC.<sup>7</sup> The Companies intend to continue their current communication practices related to quarterly changes to the PTC. The Companies update the PA Power Switch website each quarter to reflect both the projected PTC rate (after it is filed, but not yet approved by the Commission) and the actual PTC rate once approved by the Commission. In addition, when the Companies file for approval of new PTC rates at the Commission, the Companies send copies of the filings to all EGSs listed at the PA Power Switch website as serving in their respective territories. Copies of the filings are also included at the Companies' website and incorporated within the Companies' tariffs after Commission approval.

**E. The Companies anticipate an implementation date of June 1, 2019; however, significant modifications to the Tentative Order could delay implementation.**

The Commission is targeting an implementation date for the new PCAP shopping rules and revised CRP scripting procedures of June 1, 2019.<sup>8</sup> If the Tentative Order is approved without major modification, the Companies anticipate that they will meet this implementation date. To the extent the Commission's Final Order in this proceeding markedly differs from the Tentative Order, the Companies reserve their right to seek to delay implementation if the necessary system or process changes cannot be implemented prior to June 1, 2019.

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<sup>6</sup> *Id.* at 20.

<sup>7</sup> *Id.* at 14.

<sup>8</sup> *Id.* at 22.

### III. CONCLUSION

WHEREFORE, Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company respectfully request that the Pennsylvania Public Utility Commission adopt the Tentative Order subject to the limited modification described herein.

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of their Default Service Programs** : : : : : **Docket No. P-2017-2637855, et al.**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the submittal letter only of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

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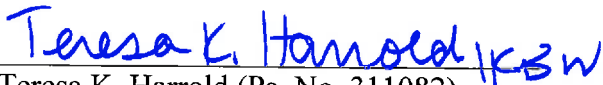
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