

Eligible Customer List (“ ECL”) Background:

In the Final Order on Reconsideration entered on November 10, 2011 in *Interim Guidelines For Eligible Customer Lists* (Docket No. M-2010-2183412), the Public Utility Commission (“PUC” or the “Commission”) determined that annual or semi-annual company-wide solicitations are costly and may be more confusing to customers. The Commission directed Electric Distribution Companies (“EDCs”) to use the following alternative approach (November 10 Order, p. 23).

In lieu of annual companywide solicitations, EDCs shall actively notify customers of their withholding options through each new customer’s welcome package and through periodic announcements in customer bill inserts, e-mail, or a separate announcement included in the customer’s paper bill or electronic notification, if available. The welcome package for new customers and periodic announcements for all customers shall also provide guidance on how to make the selection through company-provided form, e-mails, written letter, toll-free numbers, or the EDC website.

Therefore, EDCs were directed to make a single company-wide ECL solicitation during the first quarter of 2012, which provided a variety of options for customers to notify the EDC of his or her desire to withhold account and usage information from the ECL. These options included pre-paid post cards, company-provided forms, e-mails, toll-free numbers, and the EDC website. In March of 2012, PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) performed the direct mail solicitation to all customers, from which the Company received approximately 180,000 customer requests to opt-out of the ECL.

On January 17, 2014, the Commission’s Office of Competitive Market Oversight (“OCMO”) sent an e-mail to all Pennsylvania EDCs requesting opinions and suggestions of the issue of routine refreshing of electric ECLs. In that e-mail, OCMO noted that the Commission had recently established a routine, 3-year cycle for refreshing the gas ECL. See, *Interim Guidelines for Natural Gas Distribution Company Eligible Customer Lists*, Docket No. M-2012-2324075, Order entered September 23, 2013. Following is a summary of PPL Electric’s current practices regarding the ECL and its recommendation regarding routine company-wide refreshing of both the customer’s selection with regard to opting-out, as well as refreshing the customer data contained within the ECL.

PPL Electric’s Current Practices:

- Added the ECL privacy information to the Residential Customer Welcome Packet.
<https://www.pplelectric.com/~media/PPElectric/About%20Us/Docs/Residential%20Welcome%20Booklet.pdf> – Page 12
- Added the ECL privacy information to the new Business Customer Welcome Packet.
<https://www.pplelectric.com/at-your-service/~media/PPElectric/About%20Us/Docs/Business%20Customer%20Booklet> - Page 12

Note: The ECL Letter and response envelope are included in each Welcome Packet.

- Published an ECL article in PPL Electric’s bill insert Connect Newsletter in September 2012, April 2013, and March 2014, and will continue to include these articles in Connect on a bi-annually basis.
<https://www.pplelectric.com/about-us/~media/PPElectric/About%20Us/Docs/connect-newsletter/Connect-201304.pdf>
- Provided privacy information on Social Media (in both response to customer complaints and proactively engaging customers).
- Provided a web page online.
www.pplelectric.com/ecl

- PPL Electric E-power Team discusses the privacy option when customers ask about being harassed by Electric Generation Suppliers (“EGSs”).

Additionally, PPL Electric makes the ECL available to all EGSs via the Company’s secure, password protected Supplier Portal. The customer data contained in the ECL is updated weekly to ensure complete and accurate information is available. The data does not include any information whatsoever for those customers who have exercised their option to opt-out at any time.

PPL Electric’s Recommended Approach:

PPL Electric recommends that the Commission not require a routine company-wide customer solicitation. The Company makes this recommendation for three primary reasons. First, a company-wide refreshing is unnecessary because all new and existing customers currently receive adequate notification of their options regarding the ECL in the initial Welcome Packet, through PPL Electric’s periodic articles and through the Company’s internet and social media out-reach. Second, as the Commission found in the November 10 Order, annual company-wide solicitations may be confusing to customers. Specifically, customers who previously made a privacy selection may not understand whether that selection remains valid or whether a new selection is required. Third, as the Commission found in the November 10 Order, annual company-wide solicitations are costly. PPL Electric estimates that each solicitation of its more than 1 million customers would cost approximately \$800,000. The customer confusion and cost issues could be moderated by less frequent company-wide refreshing, but the fact remains that, in PPL Electric’s opinion, there simply is no need for any periodic company-wide refreshing of the ECL.

With regard to refreshing the customer data contained within the ECL, as noted above, PPL Electric updates its ECL on a weekly basis so EGSs currently have complete and accurate customer information.

Conclusion:

PPL Electric believes that it is providing customers with a clear and easily exercised means by which they can choose to withhold all of their customer account and usage information from the ECL, with no obligation to provide any reason or justification, and it strikes the appropriate balance between the privacy expectations of customers and the sharing of current customer information between EDCs and Commission-licensed EGSs.