

Legal Department

Exelon Business Services Company
2301 Market Street/523-1
PO. Box 8699
Philadelphia, PA 19101-8699

Telephone 215.841.4000
Fax 215.568.3389
www.exeloncorp.com

Direct Dial: 215.841.6863

March 4, 2010

Office of the Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Re: Torino, Incorporated v. PECO Energy Company
PUC Docket No. C-2008-2034595

Dear Mr. McNulty:

Pursuant to the Commission's February 2, 2010 Order in this docket, enclosed for filing with the Commission are five copies of the information that PECO was directed to provide in Ordering Paragraph 5, which orders:

That, within 30 days of the entry of the Commission's Opinion and Order, PECO Energy Company shall provide the Commission's Bureau of Fixed Utility Services, Energy Division, with a list of all non-residential gas accounts where an actual meter reading has not been obtained for the three previous billing cycles or longer.

If additional information is needed about this matter, please contact me at my direct-dial number above. Thank you.

Very truly yours,



Ward L. Smith
Counsel for PECO Energy Company

WLS/zyr

Enc.

cc: Bureau of Fixed Utility Services, Energy Division

Torino, Incorporated v. PECO Energy
Docket No. C-2008-2034595

On February 2, 2010, the Commission issued its Opinion and Order in this docket. Ordering Paragraph 5 directed PECO Energy Company ("PECO") to provide specified information to the Commission, ordering:

That, within 30 days of the entry of the Commission's Opinion and Order, PECO Energy Company shall provide the Commission's Bureau of Fixed Utility Services, Energy Division, with a list of all non-residential gas accounts where an actual meter reading has not been obtained for the three previous billing cycles or longer.

In the same Opinion and Order (Ordering Paragraph 6), the Commission directed its Bureau of Fixed Utility Services to provide a report and recommendation, stating:

That, within thirty days of the receipt of the aforementioned list from PECO Energy Company, the Bureau of Fixed Utility Services, Energy Division, shall provide a report and recommendation to the Commission's Law Bureau on whether a systemic issue exists, and what, if any, further steps should be taken by the Commission.

This filing provides the list required by the Commission's February 2, 2010 Order, as well as additional information that may be helpful to the Bureau of Fixed Utility Services in preparing its report and recommendation.

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1. Information required by the Commission's Order

PECO has attached to this report the information required in the Commission's Order: "a list of all non-residential gas accounts where an actual meter reading has not been obtained for the three previous billing cycles or longer."

As of February 15, 2010, ninety (90) PECO commercial gas accounts met the stated criteria. A list of those accounts is attached. Since February 15, PECO has continued its normal work-down of those unread meters. Consequently, since the list was generated, PECO has obtained readings for 37 of the 90 meters on the list, and has scheduled appointments to obtain readings from or make repairs, or initiated termination proceedings, on an additional 14 of the 90 meters on the list. (The meters for which readings have been obtained, and for which appointments have been made or termination initiated, are indicated on the attached list.) PECO continues to work to obtain access to and readings from the 39 remaining meters.

PECO has approximately 47,775 commercial gas meters on its system. The 90 meters on the list appended to this filing represent 0.0019% of PECO's commercial gas meters.

2. Additional information

A. What causes a meter "no-read" to occur?

PECO has an automatic meter reading system installed for virtually its entire service territory, for both gas and electric customers. In an automatic meter reading system, manual visits are not routinely made to customer locations. Instead, the meter

electronically communicates with an external communication/data system to transmit usage and other billing determinants to PECO so that it can prepare a monthly bill.

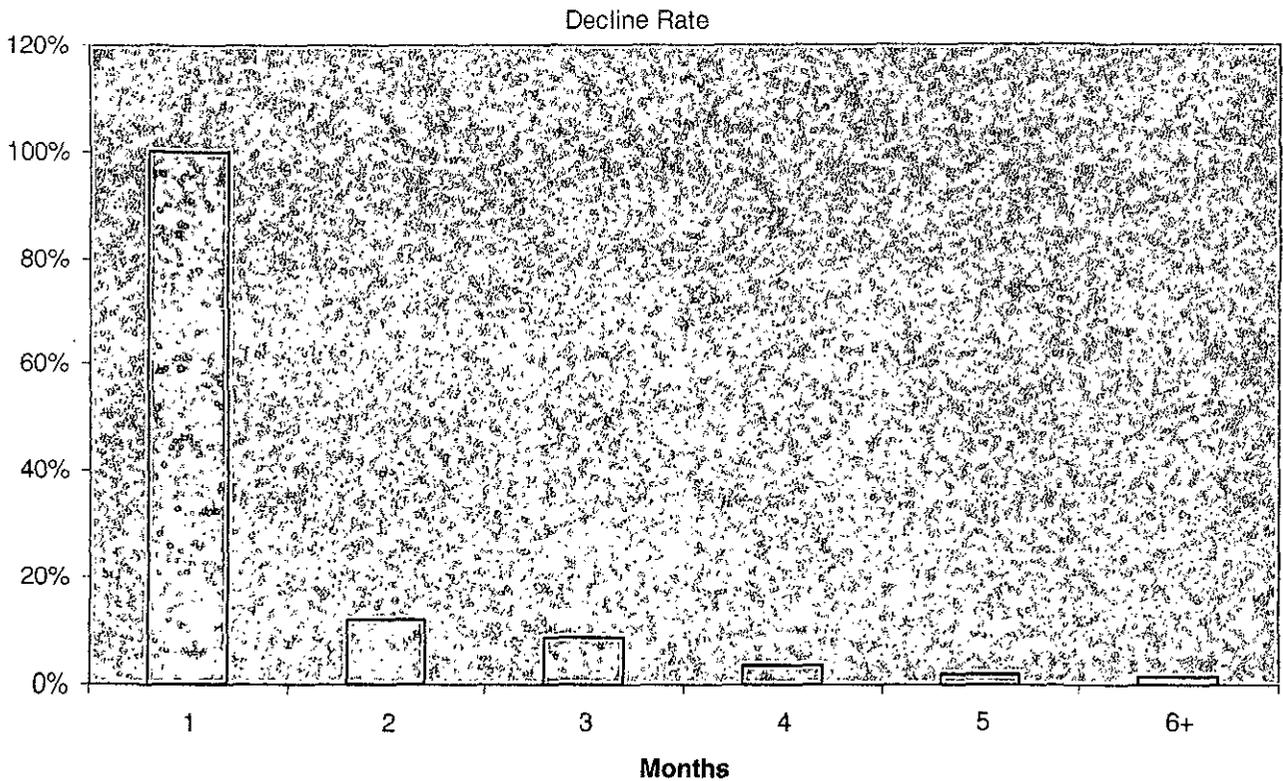
There are numerous reasons that a meter could fail to properly communicate with the external communication/data system, but those reasons largely fall into two categories. First, the meter or transmitter module may have a problem that will, ultimately, require an on-site visit to fix. Problems in this category primarily include broken meters or transmitting modules and tampered meters. Second, the meter or transmitter module may have a problem that will “clear” itself without the need for an on-site technical visit. Problems in this category generally include temporary issues such as external signal blockages due to snow, a vehicle temporarily parked where it blocks transmission from the meter to the external data/communication system, or blocked communication due to unusually heavy leaf-out in the period at the end of the tree growing season before the trees shed their foliage.

In any given month, there will be some portion of the automatically-read meters that do not successfully transmit data to the external communication/data system. It is typically difficult or impossible to determine, from the mere event of non-transmission, whether the difficulty with a specific meter falls into the first category (a problem that will require a visit to fix) or the second category (a problem that will clear itself) – although PECO does analyze no-read data each month to determine whether there are geographic clusters or other indications of a potential equipment failure affecting more than one meter. In PECO’s experience, however, for any month of non-transmitting

meters, more than 80% will be in the second category, and will clear themselves and resume successful transmission by the second (or sometimes the third) meter reading cycle without any intervention by PECO. Consequently, a “broken” meter or module, or a tampered meter, typically must exhibit two consecutive no-read events before it is identified as a meter that is in the first category, and that thus may require a field visit to place it back into service.

Chart A: “Managing Monthly AMR Reads” shows this typical profile of a significant reduction in “no-reads” that clear without intervention between the first and second months.

Chart A: Managing Monthly AMR Reads



B. What is PECO's program for addressing no-read meters?

At the beginning of 2009, PECO initiated a new program to more aggressively address no-read meters. A cross-functional team was tasked with driving down the number of PECO no-read meters. The strategy utilized by this team is:

1. Analysis of new inflow to identify and resolve equipment problems that appear to affect multiple meters (for example, a faulty data repeater).
2. Use of mobile read technology to seek readings from meters that are not "clearing" within a short period of time.
3. Active contact of customers to seek appointments to access inside meters, hard to access meters, and any meter that may require meter work or replacement. (Gas flow must be shut off in order to replace, and typically to work on, a gas meter. Once gas service has been shut off to allow work on the gas meter, it is unsafe to re-initiate gas service unless the customer is present to check gas appliances and pilot lights.)
4. An aggressive process to force access to the meters when customers deny access or when they miss or are not available for appointments, including termination of service for failure to allow access.
5. Use of performance metrics to quantitatively track improvements and areas in need of improvement for meter no-reads.
6. Monthly performance review meetings with senior management regarding the no-read program.

All of these program elements are ongoing.

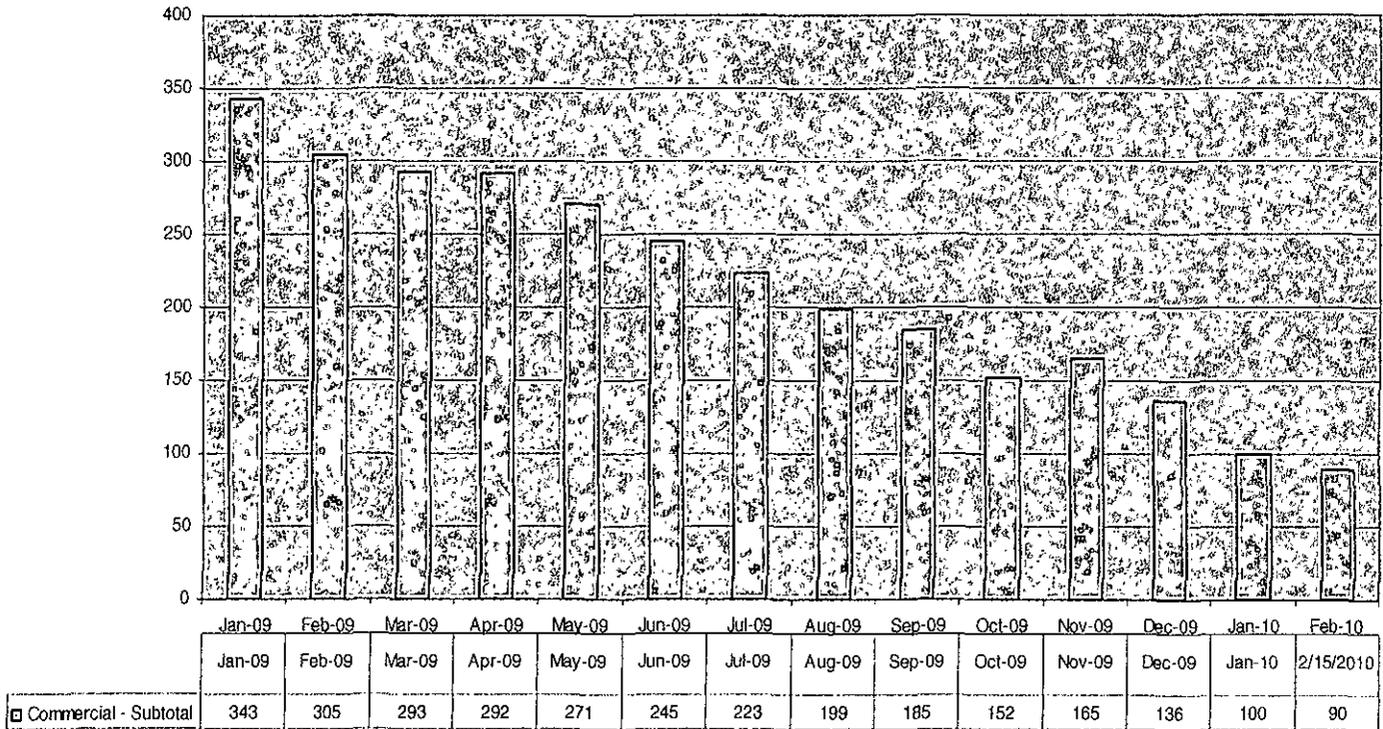
C. Has PECO's no-read program resulted in improvement to no-reads?

PECO's gas no-reads have decreased significantly since it began its more aggressive program in 2009. This is true whether the data is measured at the three-month no-read mark (as requested by the Commission in this report), or at the six-month no-read mark (which parallels the regulatory requirement for residential no-reads).

As shown in Chart B, from January 2009 to February 2010, PECO's gas three-month no-reads declined from 343 to 90, or approximately a 74% year-over-year decline.

Chart B: Gas Meter 3-Month No Read Trend

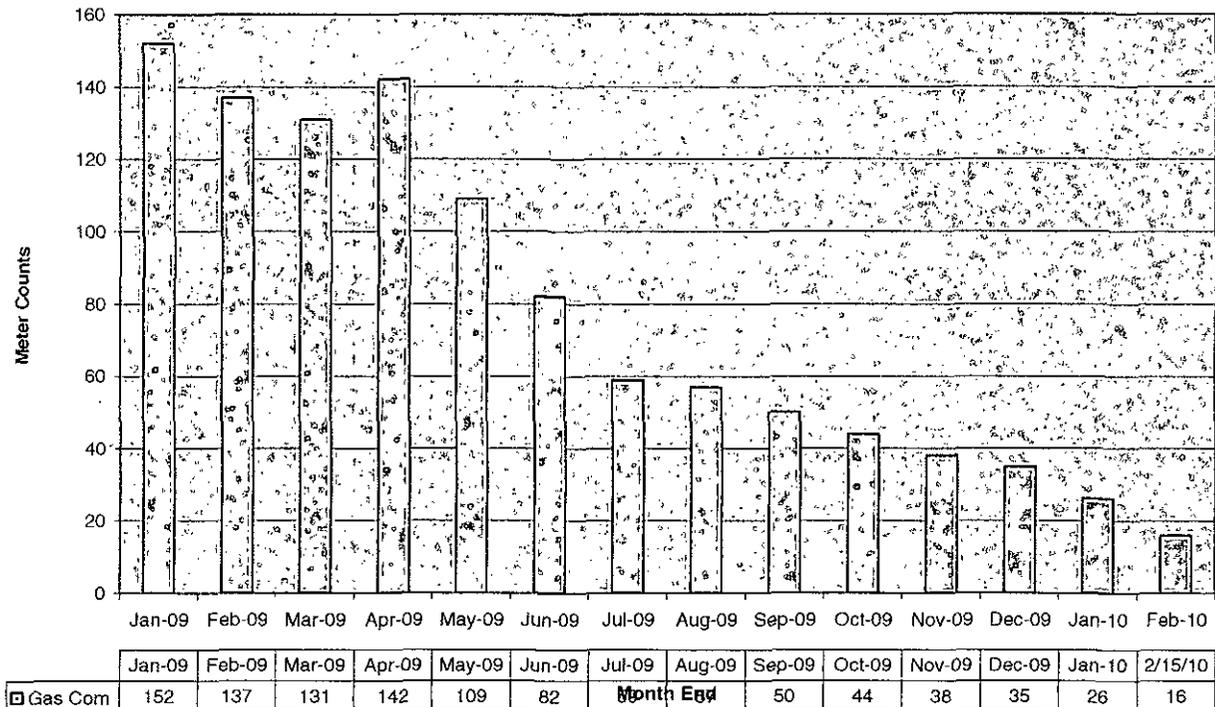
Commercial 3 month + No Read Gas Meter



PECO also closely tracks six-month no-reads. Up until a meter has three consecutive no-reads, PECO primarily focuses on addressing its own equipment issues and working cooperatively with customers to obtain voluntary access to no-read meters. At that point, however, PECO becomes progressively more aggressive to force access to the meter, including use of termination procedures to force access, with the goal of obtaining access by six months even in situations where the customer is not cooperating to provide access to the meter. Consequently, the decline in six-month gas no-reads over the past year has been even more marked than the decline in three-month no-reads. As shown in Chart C, from January 2009 to February 2010, PECO's commercial gas six-month no-reads declined from 152 to 16, a decrease of 89%.

Chart C: Gas

6+MNR Gas Meter Summary



Meter 6-Month No Read Trend

D. Summary

Meter no-reads can be caused by issues that will ultimately require a field visit to fix (such as a broken meter) or by issues that resolve themselves without intervention, such as temporary blockage of transmission paths. Over 80% of no-read situations fall into the second category and clear themselves without intervention.

At the beginning of 2009, PECO initiated an aggressive program to decrease the number of multiple-month no-reads. That program involved early analysis of the likely causes of no-reads; use of mobile reading technology; early outreach to customers to schedule voluntary access to meters; and aggressive attempts to force access to meters when customers refused to cooperate or delayed meter access.

As a result of this program, PECO has significantly decreased its multiple month no-reads. Three-month commercial gas no-reads are down 74% since January 2009. In addition, six month commercial gas no reads are down 89% over the same period.

**LIST OF PECO NON-RESIDENTIAL GAS ACCOUNTS
WITH 3-MONTH OR LONGER NO-READS
AS OF FEBRUARY 15, 2010**

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Bill Account	Address
4314201400	814 MONTGOMERY AVE, 7079 NARBERTH PA 19072
327010113	1601 A DELMAR DR *OFC FOLCROFT PA 19032
7272800607	30 NUTT RD *BLDG I PHOENIXVILLE PA 19460
8948575011	2015 W 3RD ST CHESTER PA 19013
8297300706	242 W BRISTOL RD FEASTVL TREVOSE PA 19053
2450771018	20 CONSHOHOCKEN STATE RD *POOL MTR BALA CYNWYD PA
4894701503	74 E BRIDGE ST, 1ST RR MORRISVILLE PA 19067
4008900705	1030 E LANCASTER AVE BRYN MAWR PA 19010
4558701504	806 YORK RD HATBORO PA 19040
4611401504	749 DURHAM RD NEWTOWN PA 18940
9903900203	1029 W 5TH ST CHESTER PA 19013
7010901609	2453 W RIDGE PIKE NORRISTOWN PA 19403
2657600303	0 LONGWOOD RD, D94-D95 KENNETT SQUARE PA 19348
7650901700	1200 PENNBROOK PIKE, GEN. LANSDALE PA 19446
8257701304	2116 MORELAND RD, GARAGE ABINGTON PA 19001
3713700302	41 COPLEY RD UPPER DARBY PA 19082
4244400104	0 SUMNEYTOWN PIKE *BLDG 53A WEST POINT PA 19486
7957800104	500 GERMANTOWN PIKE, STR 1040 PLYMOUTH MEETING PA
9574600606	1214 W LANCASTER AVE, 1214 W LANCASTER AVE BRYN MAW
7405600605	161 ROCK HILL RD, 1ST FRT BALA CYNWYD PA 19004
9845700404	465 PIKE RD, SEC 110 HUNTINGDON VALLEY PA 19006
5824700207	73 OLD DUBLIN PIKE, ST 11 DOYLESTOWN PA 18901
4541400906	430 LIMEKILN PIKE GLENSIDE PA 19038
304400707	101 ENGLE ST CHESTER PA 19013
2675000105	507 E MONTGOMERY AVE, 2ND FL NORTH WALES PA 19454
2038601109	0 CONSERVATORY RD *BLDG 34, & LONGWOOD RD KENNETT
5512800804	80 2ND STREET PIKE, OFF 7 SOUTHAMPTON PA 18966
3688300809	21 BALA AVE, REAR BALA CYNWYD PA 19004
6796016018	14 ACRES DR RIDLEY PARK PA 19078
2384801105	2546 GEN ARMSTEAD BLVD *UNIT 1 NORRISTOWN PA 19401
790001504	0 SWEDES FORD RD, VALLEY FORGE RD PAOLI PA 19301
3561800402	30 NUTT RD *BLDG M PHOENIXVILLE PA 19460
5583301104	290 AVON RD, BYWOOD UPPER DARBY PA 19082
9293800905	5068 W CHESTER PIKE *UNIT R EDGEMONT PA 19028
7299200107	120 S WILLOW ST KENNETT SQUARE PA 19348
6156700604	0 W TRENTON RD, ST 6A MORRISVILLE PA 19067

mtr #	Status update
020782370	Pending Termination Process
015773426	Pending Termination Process
020439516	Pending Termination Process
018800057	Pending Termination Process
016391377	Pending Termination Process
020679425	Pending appt 3/8/10
018857521	Pending appt 3/5/10
020628869	Pending appt 3/4
018877740	Pending appt 3/23/10
100005945	Pending appt 3/17/10
018890415	Pending appt 3/12/10
020504343	Pending appt for 3/8
020749573	Pending appt for 3/3
020840344	Pending appt for 3/2
018885486	Meter Read 3/2/10
018813181	Meter Read 3/2
043348435	Meter Read 3/2
020782305	Meter Read 3/2
020898638	Meter Read 2/27
020679822	Meter Read 2/27
016471178	Meter read 2/24/10
020397389	Meter read 2/24/10
020490483	Meter Read 2/24/10
042346880	Meter Read 2/24/10
017424186	meter read 2/23/10
020590407	Meter read 2/23/10
015722292	Meter read 2/23/10
020590197	Meter read 2/23/10
020510389	Meter read 2/19/10
020627514	Meter Read 2/19/10
020769525	Meter read 2/19/10
020419401	Meter Read 2/19/10
049346104	meter read 2/18/10
018765447	Meter Read 2/18/10
016410444	Meter Read 2/18/10
015578141	Meter read 2/17/10

3698501609 12 E MONTGOMERY AVE ARDMORE PA 19003
 7264400804 88 STATE RD AVONDALE PA 19311
 9569001102 410 S GOV PRINTZ BLVD, PUB LTG LESTER PA 19029
 6505500604 1118 SMITHBRIDGE RD GLEN MILLS PA 19342
 4855400401 300 HORSHAM RD, ANNEX B HATBORO PA 19040
 3913400506 3557 CRANBERRY DR HUNTINGDON VALLEY PA 19006
 8592100409 1415 RADCLIFFE ST BRISTOL PA 19007
 9464802107 914 SWEDE ST, PUB LTG NORRISTOWN PA 19401
 4604749013 2424 STATE RD, SEC 4 BENSALEM PA 19020
 6157300508 2343 STREET RD BENSALEM PA 19020
 8877414007 1142 BRADFIELD RD ROSLYN PA 19001
 6187845018 103 LONG LN, OFFICE UPPER DARBY PA 19082
 2450601204 32 CONSHOHOCKEN STATE RD, PUB LTG BALA CYNWYD PA
 4345301403 100 E LANCASTER AVE, ELEVATOR WAYNE PA 19087
 3572635005 370 HALL ST PHOENIXVILLE PA 19460
 4349960009 106 S LANSDOWNE AVE, HEAT LANSDOWNE PA 19050
 637301808 722 BARCLAY ST *HSE MTR CHESTER PA 19013
 767700604 1230 NEWARK RD, PLANT 2 TOUGHKENAMON PA 19374
 247900400 275 E STREET RD, 2ND FL FEASTERVILLE TREVOS PA 19053
 4579800902 900 JEFFERSON AVE BRISTOL PA 19007
 4634401702 406 DARBY TRL, HTG DARBY PA 19023
 6376577012 2974 GERMANTOWN PIKE FAIRVIEW VILLAGE PA 19409
 7651546027 48 SKIPPACK PIKE AMBLER PA 19002
 8855600600 235 SOUDERTON PIKE HATFIELD PA 19440
 152601707 1644 E LANCASTER AVE PAOLI PA 19301
 1713996001 3 PENNSYLVANIA AVE, TOP FRONT MALVERN PA 19355
 2424500808 4261 BRISTOL RD OAKFORD PA 19053
 3359700108 4128 STREET RD *UNIT 2 TREVOSE PA 19053
 5987160042 1935 HALLOWELL RD PLYMOUTH MEETING PA 19462
 6053001306 160 HULNICK RD, WELC CTR COATESVILLE PA 19320
 9170500506 767 HUNTINGDON PIKE HUNTINGDON VL PA 19006
 4563101804 1310 GERMANTOWN PIKE PLYMOUTH MEETING PA 19462
 858601709 0 RIVER RD, BL 1 TULLYTOWN PA 19007
 840800608 1251 VALLEY RD, NEW HUNTINGDON VL PA 19046
 912301404 2559 HAVERFORD RD ARDMORE PA 19003
 9440400103 296 W BOOT RD WEST CHESTER PA 19380
 3988136039 1420 BRISTOL PIKE MORRISVILLE PA 19067

042348110	Meter read 2/17
017456497	Meter read 2/16/10
020770286	Meter read 2/15/10
015773918	Meter read 2/13/10
020518978	Meter fixed 2/18/10
015608507	Meter changed 2/26
015685499	Meter changed 2/24/10
015716949	Meter changed 2/23
020662729	Meter changed 2/22
020590364	Meter changed 2/22
018875006	Meter changed 2/16
018801278	meter changed 2/16
020487210	meter changed 2/16
028750441	Meter chng 11/16/09 updat 2/16
018844558	Meter Chng 1/20 process 2/18
027627352	
100000998	
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020679210	
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015775687	
016514726	
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4525151020 100 WELSH RD *UNIT J HORSHAM PA 19044
 935549027 814 W LANCASTER AVE, SALON BRYN MAWR PA 19010
 2143017030 1040 DALE RD MEADOWBROOK PA 19046
 7752368010 414 W STATE ST, R/S MEDIA PA 19063
 6205450019 1 TURA DR, BAY 1&2 FOLCROFT PA 19032
 192001479 825 BETHLEHEM PIKE, REAR FLOURTOWN PA 19031
 1448900500 451 CAREDEAN DR HORSHAM PA 19044
 4250801507 0 BLACK ROCK RD, CLUBHSE S/O RIVRCRST PHOENIXVILLE PA 19068
 6816301802 610 KING OF PRUS RD, GAS RADNOR PA 19087
 3942185009 2068 W RIDGE PIKE *OFC 2 NORRISTOWN PA 19401
 8645701505 0 MERION AVE, WYND HOUSE BRYN MAWR PA 19010
 2120001405 2721 STREET RD, CHI KIT BENSLEM PA 19020
 8645701505 0 MERION AVE, WYND HOUSE BRYN MAWR PA 19010
 8200401600 69 DARBY RD PAOLI PA 19301
 2069200109 3625 WELSH RD, BL 13-16 WILLOW GROVE PA 19090
 5221830007 2151 E LINCOLN HWY *BLDG G-H LEVITTOWN PA 19056
 1386047026 901 W BUTLER PIKE, RESTAURANT AMBLER PA 19002

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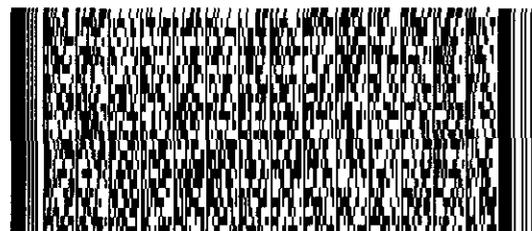
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