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Charles Gallagher Jr.
126 S. Lansdowne Ave.
Lansdowne PA 19050

Pennsylvania Public Utility Commission
Docket# C-2008-2075240

1. Regarding the dissenting statement of Commissioners Robert F. Powelson and John F. Coleman, Jr.

A **good faith** effort at reaching the customer was what I requested. At the hearing before the ALJ, PECO's answer was that it was a "business decision" to meet the requirements of notification by using a letter, even though they knew that the account would be terminated before the letter was even out of the building. The implication was that they had met the requirements of the PUC.

SUGGESTIONS: PECO has automatic dialer capabilities. The program can be used to get a response.

Example Message: *"This message is from PECO, your energy provider. Please press '1' if you are the current PECO customer at the 'address of residence.' Press '2' if you are not. Another person has asked that the utility service at this address be put in his/her name. If this transfer is in error, please contact PECO customer service. The phone number can be found on your bill."*

The computer can call the customer until it gets a dialed response of '1' or '2'. The program will record that response. The dialer can make a call hourly from a set time in the morning until the early evening, for a specified period of time.

No procedure is going to be 100% successful. Even if it were successful in only 70% of the cases, the above procedure would be better than the nearly ZERO success rate PECO has had in the past. Such a procedure would constitute a **good faith** effort by PECO, and success rates would be reported to the PUC.

Success rates achieved by this procedure could be tracked by utility companies as proof of their "good faith" effort. I do not know what capabilities the other utility companies in Pennsylvania have. They could use the automatic dialers or they could devise other ways to demonstrate that they made a good faith effort and report their success rates to the PUC.

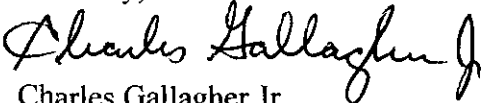
Another aspect of the "business decision" is that PECO automatically charges the customer \$6.00 to create a new account. However, *if you call to contest the fee,*

the charge is removed. Complaints regarding this charge must occur frequently, because the customer service representatives take it off *instantly* upon request, without consultation with a supervisor or asking to put the customer on hold. How many ratepayers have had this happen to them? Does PECO keep records of how many ratepayers this happens to in a year? How many ratepayers pay the \$6 without realizing that the automatic charge should not apply to them? In my phone calls to PECO, no one told me that the charge would appear, or that I should call to have it removed.

2. Regarding PECO's assertion that there is no solution to the inability of customer service to reinstate my account, with all its usage and financial information:

During the informal complaint stage, I suggested that PECO archive the existing account. To alleviate the above situation entirely, the existing account could be "archived" – placed in an inactive state. This would allow a new account to be created, but would also enable PECO to reactivate the older, archived account should the newer account be created erroneously. Any archived account would be archived for a set number of days; at the end of that time period, a final bill would be generated and the account deleted or sent to inactive storage. Such a module could be developed and entered into the existing program. *Caveat:* IT departments often claim something *cannot* be done because they *do not want* to do the work involved— i.e., writing script, beta testing, fixing glitches in the program, etc. etc. If their answer is "no" (I was already told NO during the informal stage of the complaint), please request a feasibility study by an independent entity.

Sincerely,

Charles Gallagher Jr.



CHARLES GALLAGHER
126 S LANSLOWNE AVE
LANSLOWNE PA 19050-2348

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Commonwealth of PA
PA. Public Utility Commission
P.O. Box 3265
HARRISBURG PA 17105-3265

17105+3265

