

Richard C. Gretzinger

1719 Benjamin Drive
Ambler, Pa. 19002-2406

May 26, 2011

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RECEIVED
2011 MAY 31 AM 11:03
PA P.U.C.
SECRETARY'S BUREAU

RE: **Richard C. Gretzinger v. PECO Energy Company**
PUC Docket No. C-2011-2238931

Dear Ms. Chiavetta:

I received a letter dated May 23, 2011, from Tishekia Williams, Counsel for PECO Energy Company, which provided PECO Energy Company's response to my formal complaint filed in the above referenced docket. Attached to PECO's response was "PECO Exhibit 1." This exhibit was a copy of "Supplemental No. 8 To Tariff Electric Pa. P. U. C. No. 4 Original Page No. 87A" issued December 21, 2011, Effective January 1, 2011, Voluntary Market Rate Phase In Rider. Attached is a copy of PECO's exhibit.

This tariff page states, "Starting in 2011 the following factors shall be applied to the customers prepaid balance at December 31, 2010 in order to determine the monthly credit to be issued against the customers account." The following table lists the factors for 2011 for both Rate R and Rate OP from PECO's Exhibit 1, my prepaid balance at December 31, 2010, and my calculated monthly credit.

	<u>2011 Factor</u>	<u>Bal. 12/31/10</u>	<u>Mon. Credit</u>
Rate R	0.05822	\$156.15	\$ 9.09
Rate OP	0.03027	<u>\$ 43.36</u>	<u>\$ 1.31</u>
		\$199.51	\$10.41

Utilizing PECO's 2011 factors for each rate class, my monthly credit in 2011 should be \$10.41. PECO's calculation for the monthly credit, however, applied monthly credits of only \$6.00 to my account. PECO combined the R and OP balances (\$199.51) and applied the 2011 factor for Rate OP (0.03027) to calculate their monthly credit amount of \$6.00. This tariff page (PECO's Exhibit 1) makes no provision that allows PECO's calculation, and therefore, it is improper and should not be allowed.

The PUC should order PECO to calculation the monthly credit amounts based on the factors in their Exhibit 1 and apply the factors to the prepaid balances for each rate class.

Sincerely,



Attachment: PECO Exhibit 1

PECO Exhibit
1

Supplement No. 8 To
Tariff Electric Pa. P.U.C. No. 4
Original Page No. 87A

PECO Energy Company

VOLUNTARY MARKET RATE PHASE IN RIDER

(C)

Purpose: The purpose of this Rider is to provide a tool for customers to mitigate the impact of the move to market based rates for energy and capacity. This Rider which shall be applied to the bills of customers that opt in to the program by notifying the Company, shall provide a methodology for the customer to pay earlier and smooth out any post 2010 rate increase. The amounts paid in advance by customers will earn six percent interest and shall be given back to customers as bill credits in the 2011-2013 period or as described below in the event of withdrawal or removal from the program.

Applicability: This Rider shall be applicable to all customers choosing to participate in the program by notifying the Company prior to the start of the program. Late enrollments will be accepted up until December 31, 2009. Customers with peak registered demands of over 500kW, CAP customers and customers more than 30 days in arrears are not eligible for the program.

Billing Provisions: The following surcharges shall apply to each billed kWh for the customers in the specific classes listed below starting on the first bill that is at least 15 days after enrollment but no earlier than July 1, 2009:

	<u>2009</u>	<u>2010</u>
Rate R	\$0.0053	\$0.0107
Rate RT	\$0.0053	\$0.0107
Rate RH	\$0.0049	\$0.0101
Rate OP	\$0.0049	\$0.0101
Rate GS	\$0.0030	\$0.0061
Rate HT	\$0.0063	\$0.0131
Rate PD	\$0.0041	\$0.0084
Rate SLS,SLE,SLP,AL	\$0.0088	\$0.0180
Rate POL	\$0.0088	\$0.0180
Rate TL	\$0.0088	\$0.0180

Starting in 2011 the following factors shall be applied to the customers prepaid balance at December 31, 2010 in order to determine the monthly credit to be issued against the customers account. The factors were developed to refund the balance, with interest at 6% per annum, in such a manner that results in a gradual increase in the customer's bill. The credits shall commence on the first bill issued after December 31, 2010.

	<u>2011</u>	<u>2012</u>	<u>2013</u>
Rate R	0.05822	0.02911	x.xxxxx
Rate RT	0.05822	0.02911	x.xxxxx
Rate RH	0.03027	0.03027	0.03027
Rate SLS,SLE,SLP,AL	0.05822	0.03027	0.03027
Rate GS	0.05822	0.02911	x.xxxxx
Rate HT	0.05822	0.02911	x.xxxxx
Rate PD	0.05822	0.02911	x.xxxxx
Rate SLS,SLE,SLP,AL	0.05822	0.02911	x.xxxxx
Rate POL	0.05822	0.02911	x.xxxxx
Rate TL	0.05822	0.02911	x.xxxxx

Program Enrollment: The Company upon approval of a plan by the Public Utility Commission shall provide a 60-day window for customers to enroll in the program. Late enrollments (after July 1, 2009) will be accepted up until December 31, 2009.

Withdrawal from Program: A customer may withdraw from the program at any time by providing the Company notice at least 15 days prior to the withdraw date. The withdrawal shall be effective on the first meter reading date after notice provided there are at least 10 days between meter reading date and notice date. Any remaining balance of the amount prepaid by the customer shall be credited to the customer in the first billing cycle after the withdrawal/removal or at the request of the customer issued in a check.

Removal from the Program: Customers with balances that become more than 30 days in arrears will be removed from the program. Customers transferring to a CAP rate shall also be removed from the program.

Tracking of Prepayments: The Company shall track each customer's prepayments and accrue a return of 6% per annum on the prepaid balance each month until the balance has been fully credited back to customers. The factors above applicable to 2011, 2012, and 2013 shall include the 6% interest.

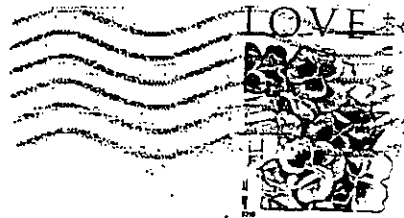
Other Rates and Riders: The state tax adjustment charge and the universal service charge shall not apply to amounts collected or credited under this rider. Customers under this rider are not eligible for the Voluntary Market Rate Transition Deferral Rider.

(C) Indicates Change

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PHILADELPHIA, PA 191

NOV 20 2013 5:55 P M



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