PECO ENERGY COMPANY
STATEMENT NO. 1

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PECO ENERGY COMPANY
FOR APPROVAL OF ITS DEFAULT
SERVICE PROGRAM

DOCKET NO. P-2012-____________

DIRECT TESTIMONY

WITNESS: BRIAN D. CROWE

SUBJECTS: DEFAULT SERVICE PROGRAM OVERVIEW, PROPOSED SCHEDULE OF PROCEEDINGS AND CUSTOMER NOTICE

DATED: JANUARY 13, 2012

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DIRECT TESTIMONY
OF
BRIAN D. CROWE

I. INTRODUCTION AND PURPOSE OF TESTIMONY

1. Q. Please state your full name and business address.

A. My name is Brian D. Crowe. My business address is PECO Energy Company, 2301 Market Street, 15th Floor, Philadelphia, Pennsylvania, 19103.

2. Q. By whom are you employed and in what capacity?

A. I am Vice President, Energy Acquisition for PECO Energy Company ("PECO" or the "Company").

3. Q. What are your current duties and responsibilities as Vice President, Energy Acquisition?

A. As Vice President, Energy Acquisition, I oversee the design and execution of the procurement of electric supply, the interface with retail electric generation suppliers ("EGSs"), and the procurement of renewable energy on behalf of PECO in compliance with Pennsylvania's Alternative Energy Portfolio Standards Act ("AEPS" or the "AEPS Act").

4. Q. Please summarize your professional experience in the energy industry.

A. I joined PECO in October 1987 as an engineer in the Company's Controls Branch. Since that time, I have been promoted through various positions of increasing responsibility, including Account Manager in the Marketing Department, Account

Executive in the Marketing Department, Corporate Strategist in the Company's Corporate Planning and Development Department, and Director, Customer Choice Implementation. I joined PECO's Regulatory and External Affairs Department in October 2000 and have held the positions of Director of Regulatory and Governmental Affairs, Director of Rates and Regulatory Affairs, and Director of Retail Rates until March 2009, when I was promoted to my current position as Vice President, Energy Acquisition.

5. Q. What is your educational background?

A. I earned my Bachelor of Science degree in Electrical Engineering in 1986 and my Masters of Business Administration in Finance in 1992, both from Drexel University.

6. Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide an overview of PECO's second default service program ("DSP II" or the "Program"), including PECO's proposed implementation plan for procurement of electric generation to meet the needs of its default service customers beginning June 1, 2013.

My testimony is divided into three parts. First, I describe PECO's basic default service obligations under Pennsylvania's Electricity Generation Customer Choice and Competition Act ("Competition Act"). I then explain how PECO has satisfied those obligations under its first default service program ("DSP I").

Second, I provide an overview of the proposed DSP II through an introduction of the other witnesses who will provide testimony about its components in this proceeding.

These witnesses will testify regarding: (1) the details of PECO's DSP II procurement and implementation plans, including the competitive process by which PECO will procure default supply; (2) changes to the supply master agreement that PECO will enter into with default service suppliers; (3) a recommended modification of the reconciliation process relating to the recovery of default service costs and other changes to PECO's existing default service rate design; and (4) new initiatives that PECO is proposing to enhance retail electric competition, including an Opt-In EGS Offer Program and two Customer Referral Programs.

Third, I describe PECO's proposed litigation schedule for consideration of DSP II and discuss the actions PECO is taking to provide notice to customers of this filing.

II. OVERVIEW OF PECO'S DEFAULT SERVICE OBLIGATIONS AND RESULTS OF PECO'S FIRST DEFAULT SERVICE PLAN

7. Q. Please describe PECO's default service obligations.

A. PECO currently provides electric generation service to all customers within its service territory who do not select an EGS or who return to default service by choice or after being served by an EGS which becomes unable or unwilling to serve. Pursuant to the Commission's regulations, 52 Pa. Code §§ 54.181 *et seq.*, PECO is required to file a plan with the Commission that sets forth how PECO will meet its default service obligations, including its strategy for procuring generation supply, a schedule for implementation, and a rate design to recover PECO's reasonable costs. Notably, under Section 2807(e)(3.1) - (3.2) and (3.4) of the Competition Act, PECO is required to procure generation supply through competitive procurement processes to obtain a “prudent mix” of contracts that is designed to ensure “adequate and reliable service” at the “least cost to customers over time”.

8. Q. How does PECO currently meet its default service obligations?

A. PECO is currently operating under an initial default service plan, DSP I, which was approved by the Commission in 2009, took effect on January 1, 2011 and continues through May 31, 2013. Prior to that date, PECO furnished “provider of last resort” service at fixed rates established by the Commission.

Under DSP I, PECO conducts competitive procurements of wholesale power and associated services for four different default service customer classes: (i) residential customers, (ii) small commercial customers with less than 100 kW of peak demand and lighting customers; (iii) medium commercial customers whose peak demand is equal to or greater than 100 kW of peak demand but less than or equal to 500 kW; and (iv) large commercial and industrial customers with peak demands greater than 500 kW.

The principal procurement features of DSP I include the use of fixed-price, “full requirements” supply contracts for residential and small and medium commercial customers and spot-priced full requirements contracts for large commercial and industrial customers. DSP I also includes tailored supply portfolios with varied contract lengths for each customer class. Procurement under DSP I occurs at different times of the year to minimize the risk of procuring all generation supply at the same time and reduce the potential for significant default service price volatility.[1]

9. Q. Does PECO have other obligations under DSP I?

A. Yes. Consistent with its procurement obligations and its approved DSP I, PECO maintains contingency plans in the event of a supplier default and uses standardized documents and procedures approved by the Commission when conducting its procurements. In addition, as part of the comprehensive settlement among the parties to the DSP I proceeding, PECO undertook a wide range of other activities, including initiatives to support retail competition, the expansion of universal service and the implementation of new rate designs.

10. Q. Has PECO met its obligations?

A. Yes. PECO has met all of its obligations under DSP I, including its fundamental obligation, as default service provider, to provide adequate and reliable default service to customers at least cost over time. Furthermore, during DSP I, PECO has effectively administered the switching of default service customers to EGSs and retail competition has flourished in PECO's service territory: 56% of PECO's total customer load is currently being served by an EGS, with switching percentages equal to 25% for the Residential class, 52% for the Small Commercial class, 78% for the Medium Commercial class, and 96% for the Large Commercial and Industrial class. PECO believes that the transition from fixed generation rates to variable default

[1] *See*, *e.g.*, *Pennsylvania Public Utility Commission v. Pike County Light & Power Company*, Docket No. P-0052168 (Order entered Dec. 21, 2005) (discussing procurement in Pike County after Hurricane Katrina, which resulted in prices corresponding to an average 73% increase in overall electric rates for the EDC's retail customers).

service rates obtained through competitive procurements and significant retail shopping has been successful, without "rate shock," due in part to the implementation of the following initiatives:

(1) A comprehensive EGS purchase of receivables ("POR") program in which PECO buys amounts owed to EGSs by PECO customers for generation supply service, without discount, other than recovery of POR implementation costs. PECO then collects those amounts from customers without recourse to the EGSs.

(2) A direct mail outreach program to every PECO customer to update the customer's preferences regarding the release of its usage information and other data on PECO's Eligible Customer List. This outreach program resulted in a sixty-seven percent (67%) increase in the number of customers electing to have their data released to EGSs.

(3) A budget billing program available to all customers, including EGS customers, to help customers manage their energy expenses through set monthly payments.

(4) A wide variety of information technology and internet-based upgrades, including a web-based tool for customers and EGSs to easily download usage information and a web-based Price-to-Compare ("PTC") tool for customers.

(5) A $6 million customer education program that focuses on changes to the energy market and the corresponding impact on customers, the promotion of

shopping, and other tools to help customers understand and manage their energy use. The campaign includes earned media, paid media, direct communications, web support, and more than 790 community events and other customer outreach efforts resulting in 341,872 customer interactions.

(6) Promotion of shopping through inclusion of EGS contact information in articles and newsletters to customers, as well as PECO-sponsored public events with EGSs for customers.

(7) Expedited release of default service procurement results, consistent with Commission guidance, to facilitate the comparison of EGS prices and default service rates.

In addition, in 2012, PECO is initiating another customer education campaign which will include three coordinated mailings to encourage residential and small commercial customers to shop for competitive electric generation supply. The mailings will consist of: (1) a Commission-endorsed postcard encouraging shopping (February 2012); (2) a large tri-fold flyer promoting the Commission's website at PAPowerSwitch.com (May 2012); and (3) a letter from PECO encouraging shopping and directing customers to PAPowerSwitch.com, with a list of answers to frequently asked questions (Fall 2012).[2]

[2] See *Petition of PECO Energy Company for Expedited Approval of its 2012 Consumer Education Plan*, Docket No. P-2011-2279733 (filed December 22, 2011).

11. Q. Are there any generation supply solicitations remaining under DSP I?

A. Yes. Under the procurement schedule approved by the Commission in 2009, PECO has completed six solicitations and will conduct three more solicitations prior to June 1, 2013. During the first quarter of 2012, PECO will conduct solicitations for ten tranches of one-year fixed price full requirements contracts and seven tranches of two-year fixed price full requirements contracts for residential customers. In the Spring 2012 and Fall 2012, PECO will conduct solicitations for block energy purchases for residential customers.

A. For the Small and Medium commercial customer classes, PECO will conduct a solicitation in the first quarter of 2012 procuring, for each class, ten tranches of one-year fixed price full requirements products and three tranches of one-year full requirements products based on day-ahead PJM spot market prices. With respect to the Large commercial and industrial customer class, PECO will conduct a solicitation in the first quarter of 2012 for fifty-four tranches of one-year full requirements products priced based on day-ahead PJM spot market prices.

III. OVERVIEW OF PECO'S SECOND DEFAULT SERVICE PLAN

12. Q. What principles did PECO use in designing DSP I?

A. The primary goal of PECO's DSP I was to ensure that default service customers had access to a reliable supply of generation at the least cost over time. To that end, PECO adhered to the following principles:

(1) Competitive forces will produce the least cost to customers over time and, therefore, the development of retail and wholesale energy markets should continue to be encouraged.

(2) Obtaining a "prudent mix" of default generation supply contracts at least cost over time should take into account factors such as the benefits of price stability and reflect the different needs of various customer types through tailored procurement strategies.

(3) Default service rate design should be understandable and promote a smooth transition from existing capped rates to rates that reflect the competitive procurement of generation supply service.

13. Q. Did PECO make any changes to these guiding principles in designing DSP II?

A. Yes. PECO has revised the third principle in light of the end of capped rates during DSP I and has added a fourth principle as follows:

(3) Default service rate design should be understandable and reflect the competitive procurement of generation supply service.

(4) Subsequent default service filings should reflect "lessons learned" under earlier default service plans to improve competitive default service procurements and further enhance the development of competitive markets while maintaining compliance with the Public Utility Code, the AEPS Act, and other legal requirements.

14. Q. What is PECO's proposed default service procurement plan for DSP II?

A. **Mr. John J. McCawley**, PECO's Director of Energy Acquisition, provides detailed testimony regarding PECO's proposed default service procurement plan in PECO Statement No. 2. As Mr. McCawley explains, PECO proposes to maintain its existing customer classes from DSP I. PECO believes that the current procurement classifications properly reflect the nature of the load requirements of each customer class and a balancing of other factors, including rate stability and the amount of shopping in PECO's service territory during DSP I.

Mr. McCawley also describes how PECO has revised its procurement strategy in light of its experience under DSP I. PECO's proposed procurement strategy under DSP II for each customer class is as follows:

Residential Class. PECO is proposing to transition to a mix of one-year and two-year full requirements products for the Residential class, with the two-year products comprising approximately sixty percent of the contract mix. The supply contracts will be laddered, with six-month spacing between commencement of delivery periods. PECO will transition to this blend of contracts for the majority of its Residential class load requirement during DSP II using products with term lengths that vary from six months to eighteen months. PECO will also continue to use existing block products with spot market balancing, but, as Mr. McCawley explains, PECO will not be procuring new block energy products in DSP II. After the first procurement to be held in Fall 2012, all products will be procured approximately two to four months prior to delivery (instead of five to nine months prior to delivery as is current practice).

Small Commercial Class. PECO proposes to eliminate the current two-year fixed price full requirements products and spot-priced full requirements products and to replace them with one-year fixed price full requirements products with semi-annual overlapping periods, with an initial transitional procurement of six month full requirements contracts to facilitate laddering. Like the Residential class, all products will be procured approximately two to four months prior to delivery.

Medium Commercial Class. PECO proposes to eliminate the current one-year fixed price full requirements and spot-priced full requirements products and to replace them with half-year fixed price full requirements products, without overlap. Like the Residential and Small Commercial classes, all products will be procured approximately two to four months prior to delivery.

Large Commercial and Industrial Class. PECO proposes to eliminate the current spot-priced full requirements products and to replace them through direct procurements of energy and related services from the PJM energy markets.

Consistent with the Commission's Policy Statement and in order to assemble the "prudent mix" of procurement contracts described above, PECO's DSP II provides for the acquisition of generation supply to cover the two-year period from June 1, 2013 to May 31, 2015, with the terms of a limited quantity of contracts extending beyond May 31, 2015 to help ensure that customers are not exposed to rate volatility associated with replacing a large portion of default service supply in a short period of time.

15. Q. Mr. Crowe, did PECO consider the Commission's recommendation that EDCs file plans that limit or eliminate the existence of short-term energy contracts extending past the end date of the EDC's default service plan time period?

A. Yes. PECO has been an active participant in the Commission's Retail Market Investigation, and carefully considered each of the Commission's recommendations in formulating DSP II, including its recommendation to limit or eliminate any contracts that will extend past the end of PECO's default service plan period (May 31, 2015) to avoid hindering possible future changes relating to Pennsylvania's default service model.[3] For this reason, PECO has limited the "over-hang" of contracts in its Plan, and will not procure any contract that will extend beyond May 31, 2015 until early 2014. In the event that legal developments result in PECO no longer serving as the default service provider for its service territory after May 31, 2015, there should be ample time to adjust PECO's solicitations that extend beyond May 31, 2015. Thus, PECO's DSP II does not presume any particular outcome of the Commission's Retail Market Investigation, and reflects a prudent balance between the benefits of achieving price stability for customers with the Commission's recommendation to limit extended contracts.

[3] See *Investigation of Pennsylvania's Retail Electricity Market: Recommended Directives on Upcoming Default Service Plans*, Docket No. I-2011-2237952 (Order entered December 16, 2011) ("*Default Service Recommendations Order*"), pp. 3-4, 19-21.

In addition to explaining PECO's revised procurement strategy, Mr. McCawley describes the proposed changes to its contingency requirements in the event of PECO's failure to obtain sufficient approved bids for a portion of default service supply in a solicitation. PECO is not making any changes to its contingency requirements in the event of supplier default.

16. Q. Has PECO developed an implementation plan as part of its second default service program?

A. Yes. In accordance with the Commission's regulations, PECO's DSP II includes a detailed implementation plan consistent with its revised procurement strategy. In his testimony, Mr. McCawley explains this implementation plan, including PECO's complete schedule of solicitations for its proposed procurements.

17. Q. How did PECO determine that its proposed DSP II is a sound approach to meeting "least cost over time" requirements?

A. PECO engaged The NorthBridge Group to conduct an analysis of the results of its DSP I procurements and to evaluate PECO's proposed DSP II. In PECO Statement No. 3, **Mr. Scott Fisher** of The Northbridge Group presents this analysis and evaluation. Mr. Fisher reviews the "lessons learned" under DSP I with respect to procurement issues and discusses how PECO's proposed revisions to its procurement plan provide for a "prudent mix" of contracts for all customer classes and are consistent with "least cost over time" requirements. Mr. Fisher further explains how PECO's plan not to procure new block energy contracts reduces risks for residential customers.

18. Q. Does PECO's DSP II anticipate a competitive bid process?

A. Yes. The competitive Request for Proposals process under DSP I has been successful and, in PECO Statement No. 4, **Dr. Chantale LaCasse** of NERA Economic Consulting, Inc. ("NERA") explains that PECO will continue to use its competitive RFP process for procurements in light of the positive experience under DSP I. Dr. LaCasse also describes certain proposed changes to improve procurement procedures that PECO is recommending for DSP II. As Dr. LaCasse explains, the improvements to the RFP process focus on streamlining the solicitation process to reduce administrative costs and burdens to suppliers in order to encourage additional participation in the RFP process.

19. Q. Is PECO revising its supply master agreement or other documentation for use with wholesale suppliers in these procurements?

A. Yes. As explained by Mr. McCawley, PECO is updating its supply master agreement ("SMA") to reflect various changes in PJM procedures and some improvements and technical clarifications that are being made in response to PECO's experience with wholesale suppliers in DSP I and other developments.

20. Q. Does PECO propose that its wholesale generation affiliates be permitted to participate in its competitive procurements?

A. Yes. As explained by Dr. LaCasse, PECO's competitive bid process will continue to comply with the Commission's codes of conduct and includes protocols to ensure that

PECO's wholesale generation affiliates do not receive an advantage in the bidding process or any other aspect of PECO's default service implementation plan.

21. Q. Is PECO proposing any revisions to its existing default service rate design?

A. Yes. PECO is proposing several changes to simplify and improve its adjustment process relating to the recovery of default service costs. In PECO Statement No. 5, **Mr. Alan B. Cohn**, Manager, Revenue Analysis, Regulatory Group, describes PECO's proposals to reconcile "over/under" collections of default service charges for residential, small commercial, and medium commercial customers on an annual basis (instead of quarterly) and to mitigate over/under collection effects for large commercial and industrial customers. Mr. Cohn also explains PECO's proposal to incorporate its currently separate Alternative Energy Portfolio Standard Surcharge into its Generation Supply Adjustment charge along with other default service charges. In addition to the foregoing, Mr. Cohn explains PECO's elimination of several expiring rate provisions from its tariff and tariff changes relating to PJM auction revenue rights and cost recovery of PECO's proposed retail market enhancements.

22. Q. Please describe PECO's proposed new initiatives to enhance retail competition.

A. During DSP II, PECO is seeking to implement several new initiatives and programs to support and enhance retail competition. As discussed by Mr. McCawley in his testimony, PECO is proposing the following competitive enhancements:

- ***Opt-In EGS Offer Program.*** Consistent with the Commission's recommendation in the *Default Service Recommendations Order*, PECO is proposing to implement an opt-in program in which EGSs will bid to provide competitive retail electric service to fifty percent (50%) of PECO's non-shopping residential default service residential customers, who will be randomly selected by PECO.

  The program will be implemented through a one-time RFP for twelve-month retail service offers from EGSs for service beginning on June 1, 2013. EGSs may submit multiple bids consisting of an offer price and the number of customers to be served at that price that is at least five percent less than PECO's price-to-compare for the period beginning June 1, 2013, with a minimum of 25,000 customers. Bids will be tabulated in ascending order of price, with the price that results in the cumulative number of potential customers equaling or exceeding 50% of the non-shopping default service customers establishing a clearing price.

  Upon submission and approval of the RFP results by the Commission, the EGSs who offered a price at or below the clearing price will be assigned a portion of the customers corresponding to their winning bids. Each EGS will then send a letter (developed jointly by PECO, the Commission, EGSs, and the Office of Consumer Advocate) which will include the corporate marks of both PECO and the EGS to the EGS' assigned customers, explaining the offer for consideration by the customer. If a customer accepts the offer, an EGS must enroll that customer and process the customer switch request in accordance with PECO's Electric Generation Supplier Tariff. The cost of the RFP process and development of the standard offer materials will be recovered by PECO from the winning EGSs in proportion to the number of customers allocated to each EGS. In the event that there is not a winning EGS, the foregoing costs will be recovered by PECO through a discount on purchased EGS receivables.

Standard Offer Customer Referral Program. As explained by Mr. McCawley, PECO believes that customers would be best served by a standard offer customer referral program administered through a statewide call center. In the event that such a statewide program is not implemented, PECO proposes to implement a standard offer customer referral program in the form of a Supplier of the Month program. Each month, participating EGSs will submit a binding, fixed-price bid to provide electric generation service to residential default service customers for a twelve-month period beginning approximately six weeks after the bid date, with the offer available to customers for thirty days. The EGS with the lowest offer will be selected from the bids processed by an independent evaluator and identified on PECO's website, which will be updated monthly.

Customers may enroll with the winning EGS through PECO's website or by telephone using an interactive voice response system ("IVR") maintained and operated by PECO or a dedicated call center referral group provided by PECO. As with the Opt-In EGS Offer Program, EGSs will be required to enter into an agreement to offer standard terms and conditions and comply with the RFP provisions. An EGS will be required to enroll a customer who accepts its offer and be responsible for processing the customer switching request in accordance with PECO's Electric Generation Supplier Tariff. Enrolled customers will be permitted to select another EGS or return to default service without penalty. At the end of the twelve-month period, customers will receive a clearly communicated fixed rate offering applicable for at least three months, during which time the customer may cancel the agreement without penalty upon thirty days written notice to the EGS. Winning suppliers will be required to provide notice of this price change and renewal period in accordance with the Commission's regulations prior to the end of the twelve-month period. The initial and on-going costs of the Standard Customer Referral Program will be recovered by PECO through a discount on purchased EGS receivables.

- ***New/Moving Customer Referral Program***. PECO proposes to implement a New/Moving Customer Referral Program as recommended in the Intermediate Work Plan after it is approved by the Commission. As explained by Mr. McCawley, this program will include revised and enhanced call center scripts promoting shopping and PAPowerSwitch.com. as well as an updated version of PECO's "New/Mover Kit".

- ***Use of EGSs in Provision of Time-of-***Use ***("TOU") Service.*** Consistent with the *Default Service Recommendations Order*, PECO is soliciting EGS participation to provide the commodity service associated with PECO's TOU pilot, which the Commission has previously approved as part of PECO's smart meter program.[4] If interested, an EGS may also bid on the entire implementation requirement.

- ***Referral of PECO Wind Customers***. As the PECO Wind program is eliminated, PECO will refer current PECO Wind customers to interested EGSs who can offer these customers a "green energy" product.

- ***Seamless Moves.*** PECO will also initiate a collaborative with interested EGSs to develop technical requirements and cost estimates for system changes required to permit residential and commercial customers to change their address of service and maintain EGS service. If EGSs express sufficient interest in the program, PECO will initiate implementation with costs recovered through a temporary discount on EGS receivables purchased from all EGSs.

In addition, PECO will continue promotion of shopping through the inclusion of EGS contact information in PECO newsletters sent with residential and commercial customer bills.

23. Q. Is PECO taking any other steps as part of DSP II in light of the Commission's Retail Markets Investigation?

A. Yes. The proposed SMA also includes additional acknowledgments by suppliers of the possibility of changes in default service load in light of the Commission's Retail Markets Investigation and its consideration of whether entities other than EDCs

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[4] *See Petition of PECO Energy Company for Approval of its Initial Dynamic Pricing and Customer Acceptance Plan*, Docket No. M-2009-2123944 (Order entered April 15, 2011).

should be default service providers in the future, as well as additional retail market enhancements. In addition, PECO is requesting that the Commission expressly affirm PECO's right to full and current recovery of all costs of DSP II in accordance with 66 Pa. C.S. § 2807(e)(3.9) in light of the Commission's consideration of possible changes to the current default service model.

IV. PROPOSED LITIGATION SCHEDULE

24. Q. Mr. Crowe, what procedural schedule is PECO proposing for this proceeding?

A. In accordance with the nine-month period for approval of a default service plan under the Public Utility Code, PECO proposes the following schedule for this proceeding:

January 13, 2012	Petition Filing
February 8, 2012	Prehearing Conference
March 15, 2012	Other Parties Direct Testimony Due
April 12, 2012	Rebuttal Testimony Due
May 3, 2012	Surrebuttal Testimony Due
May 15-17, 2012	Hearings
June 14, 2012	Main Briefs
July 3, 2012	Reply Briefs
August 7, 2012	Recommended Decision
August 28, 2012	Exceptions

September 11, 2012	Reply Exceptions
October 11, 2012	Commission Order

V. NOTICE

25. Q. How will PECO provide notice to its customers of this filing?

A. PECO is providing extensive public notice of this filing to its customers. First, PECO is including a stand-alone bill insert in all customer bills over a thirty-day period beginning on February 3, 2012. This stand-alone bill insert will notify customers of this filing, where they may obtain copies, and how they may participate in this proceeding by filing comments or complaints with the Commission. Second, PECO is publishing notices containing similar information in all of the major newspapers serving PECO's service territory, and also issuing a press release to all major media (newspapers, television and radio stations) in its service territory. All notices will refer to PECO's website, (www.peco.com/know), where a copy of the entire filing will be maintained. PECO is also serving copies of this filing on the Pennsylvania Office of Consumer Advocate, the Pennsylvania Office of Small Business Advocate, the Commission's Bureau of Investigation and Enforcement, PJM, and all EGSs registered in PECO's service territory, and requesting the Commission to publish notice of this filing in the *Pennsylvania Bulletin*.

VI. CONCLUSION

26. Q. Does this conclude your direct testimony?

A. Yes.