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May 29, 2012

VIA ELECTRONIC FILING

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

***Re: Investigation of Pennsylvania's Retail Electricity Market
Docket No. I-2011-2237952***

Dear Secretary Chiavetta:

On May 21, 2012, the Commission issued a Secretarial Letter ("May 21 Secretarial Letter") proposing to postpone the mailing of a tri-fold flyer and EDC letter containing FAQs by six months each from the dates suggested in its March 1, 2012 Final Order at the above-referenced docket, resulting in the tri-fold flyer being distributed in November 2012 and the EDC letter and FAQs being mailed around March 2013. While Metropolitan Edison Company ("Met-Ed"), Pennsylvania Electric Company ("Penelec"), Pennsylvania Power Company ("Penn Power") and West Penn Power Company ("West Penn") (collectively "the Companies") continue to support the Commission's efforts to educate customers about the ability to choose an alternative electric supplier and the benefits of shopping, the Companies share the concerns raised by the Commission in its May 21 Secretarial Letter that customers may become overwhelmed and develop a negative impression of customer choice due to the high volume of mail that customers are targeted with regarding the option to shop. Therefore, the Companies support the proposed postponement, subject to several clarifying recommendations, in light of both the Companies' existing obligations to mail customer education materials and their pending default service proceedings, which propose several market enhancements that will include customer mailings.

First, due to the preexisting obligations from other proceedings, the Companies believe flexibility should be provided to electric distribution companies ("EDCs") to be able to orchestrate individualized timelines for their various mailings that will be most efficient for the Companies, while providing the strongest benefit to customers. For instance, the Companies are

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preparing to send twelve customer education mailings, which include information on customer choice and provide various current EGS offers, between May 2012 and May 2013 pursuant to various Commission orders:

<u>Planned Mailings</u>	<u>Timeframe</u>
Met-Ed and Penelec*	May 2012
Penn Power**	June 2012
West Penn***	July 2012
Penn Power** and West Penn***	November 2012
Met-Ed and Penelec*	December 2012
Penn Power**	March 2013
Met-Ed and Penelec*	April 2013
Penn Power**	May 2013

These mailings are independent of the tri-fold flyer and the customer education letter and FAQs that are referenced by the May 21, 2012 Secretarial Letter, the annual postcard that will be again mailed in early 2013, and any additional mailings that are anticipated to occur as a result of implementation of the Companies' pending 2013-2015 default service plans.

Rather than the tri-fold flyer being distributed in November 2012, the Companies believe their customers would derive a greater benefit from the communications and be less overwhelmed if the tri-fold flyer were distributed in October 2012. An October mailing would also ensure that the mailing would not be duplicative of the preexisting mailings that the Companies have planned.

Second, consideration should also be given to the potential overlap of content in consumer education efforts. For purposes of the Companies' existing mailings, all EGSs serving in the respective territories are given the opportunity to provide an offer for inclusion, and the Commission's Office of Communications, EGSs that were signatories to the settlements, and the Offices of Consumer Advocate and Small Business Advocate are given the opportunity to review and approve the letter that is enclosed with these offers. These existing, ongoing mailings not only contain a substantially similar message to the customer letter referenced in the May 21 Secretarial Letter, but also bring to the customer's doorstep information they can immediately use to take action. Therefore, to avoid redundancy and confusion, the Companies request that they be exempt from sending the additional EDC letter with FAQs, and instead include the FAQs with their existing letter format (which is attached to this letter as Attachment A). However, in

*Docket Nos. P-2009-2093053 and P-2009-2093054 (Met-Ed and Penelec) (Order entered November 6, 2009) (obligating Met-Ed and Penelec to each send EDC letters with EGS offers twice annually).

**Docket No. P-2010-21576862 (Penn Power) (Order entered October 21, 2010) (obligating Penn Power to send EDC letters with EGS offers twice annually).

****Joint Application of West Penn Power company doing business as Allegheny Power, Trans-Allegheny Interstate Line Company and FirstEnergy Corp. for a Certificate of Public Convenience under Section 1102(A)(3) of the Public Utility Code approving a change of control of West Penn Power company and Trans-Allegheny Interstate Line Company*, Docket Nos. A-2010-2176520 and A-2010-2176732 (Opinion and Order entered March 8, 2011) (obligating West Penn to send EDC letters with EGS offers on two separate occasions between the consummation date of the Merger and June 1, 2013).

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the event the Commission does not exempt the Companies from mailing a second EDC letter, latitude should be afforded to adjust the month of mailing to effectively accommodate such initiatives due to the fact that preparation, planning, printing, and call center training must be coordinated to ensure a cohesive and successful communication effort at a reasonable cost, without creating conflict or overlap. Specifically, the EDC letter mailing should be delayed until the second half of 2013 so that it will be sent after other existing commitments are concluded.

For these reasons, the Companies request that the Commission adopt the recommendations set forth herein that EDCs be granted flexibility in coordinating the timelines on all mailings, as well as that the Companies be exempt from mailing the additional customer education letter. By adopting these recommendations, it is more likely that customers will not be presented with material that they have repeatedly seen, therefore decreasing the risk for frustration and confusion identified by the Commission, and helping to avoid unnecessary expenses associated with duplicative mailings. EDCs should be given the opportunity to orchestrate their respective mailings in a manner that will best encourage a positive attitude towards increased shopping, with minimal redundancy and overlap.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

dln
Enclosures

c: Via Electronic Mail:
Office of Competitive Market Oversight (ra-RMI@pa.gov)

Dear Penn Power Customer,

Pennsylvania's Electric Choice Program gives you the opportunity to choose the company that generates your electricity. You may be able to save money by selecting an electric generation supplier that is offering you a lower price than your Price to Compare (located under the Messages heading on page one of your electric bill). This is the price Penn Power charges you for electric generation and transmission service.

To help you make the best choice, we are including with this letter brochures from some of the electric generation suppliers that are currently seeking customers in your area. Other electric generation suppliers may have offers available.

If you have any questions about an offer, or would like to sign up for an offer, please contact the supplier directly. To enroll with a supplier, you will need your Penn Power Customer Number which can be found on the top of this letter or under the Charges from Penn Power heading on page one of your electric bill.

When you select an alternative electric generation supplier, that company will notify us and we will then send you a letter to confirm your choice.

Whether or not you choose an alternative electric generation supplier, Penn Power will continue to deliver your electricity, provide reliable service and respond to outages.

If you have any questions about electric choice, call us at 1-888-478-2300, or you may call the Public Utility Commission at 1-800-692-7380. Information on electric choice is also available at www.PAPowerSwitch.com or from the Office of Consumer Advocate at www.oca.state.pa.us.

* Please see reverse side for contact information for the suppliers participating in this mailing

