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File #: 2507/151904

March 26, 2013

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015
Docket No. P-2012-2302074

Dear Secretary Chiavetta:

Enclosed please find the Reply Comments of PPL Electric Utilities Corporation Regarding the Revised Retail Opt-In and Standard Offer Programs in the above-referenced proceeding. Copies will be provided as indicated on the certificate of service.

Respectfully submitted,

Michael W. Hassell

MWH/skr
Enclosure

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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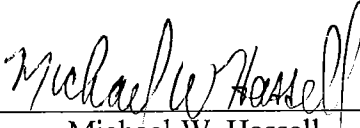
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Date: March 26, 2013



Michael W. Hassell

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PPL Electric Utilities :
Corporation for Approval of a Default : Docket No. P-2012-2302074
Service Program and Procurement Plan for :
the Period June 1, 2013 through May 31, :
2015 :

**REPLY COMMENTS OF PPL ELECTRIC UTILITIES CORPORATION REGARDING
THE REVISED RETAIL OPT-IN AND STANDARD OFFER PROGRAMS**

I. INTRODUCTION

By Order entered January 24, 2013, the Pennsylvania Public Utility Commission (“Commission”) accepted, in part, and revised, in part, the Retail Opt-In Program and the Standard Offer Program proposed previously by PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) in this proceeding. *Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015*, Docket No. P-2012-2302074 (“January 24 Order”). The Commission directed the Company to meet with the parties in this proceeding and also instructed PPL Electric to submit revised terms and conditions applicable to the Retail Opt-In Program and the Standard Offer Program to the Commission by March 11, 2013. Per the Commission’s directive, PPL Electric submitted, on March 11, 2013, a revised Retail Opt-In Program and a revised Standard Offer Program.

PPL Electric requested that the Commission establish a comment period, in response to the March 11th filing. On March 21, 2013, consistent with PPL Electric’s proposed comment period, the Office of the Consumer Advocate (“OCA”) filed comments on the revised Retail Opt-In and Standard Offer Programs. Additionally, on March 21, 2013, FirstEnergy Solutions

Corp. filed a letter stating that it will not be submitting comments on PPL Electric's revised Retail Opt-In and Standard Offer Programs. Therefore, with this submission PPL Electric only responds to the comments submitted by OCA on March 21, 2013.¹

II. REPLY COMMENTS

As a general matter, OCA's comments argue that electric generation suppliers ("EGSs") should pay for the costs of the revised Retail Opt-In Program and revised Standard Offer Program. PPL Electric understands this position and has previously stressed in this proceeding that costs related to the retail market enhancements should be paid by the EGSs that participate in the related programs. At the same time, PPL Electric recognizes that EGSs have previously argued that they should not bear all of the costs, or at least should have caps that potentially place an upper limit on their cost responsibilities. The Company believes that based on the record in this proceeding and through the meetings held in response to the January 24 Order it has reasonably accommodated the parties' differing positions with the proposals set forth in the March 11th filing.

A. REVISED RETAIL OPT-IN PROGRAM

As an initial matter it is important to state that the Commission has postponed the Company's implementation of the revised Retail Opt-In Program. On March 14, 2013, two days after PPL Electric submitted its revised Retail Opt-In Program, the Commission issued a Tentative Order stating that the Retail Opt-In Programs proposed by various electric distribution companies ("EDCs") were postponed, pending the Commission's review of the implementation schedule for these programs. *See Petition of PECO Energy Company, et al.*, Docket Nos. P-

¹ While PPL Electric proposed a specific comment schedule in its March 11th filing, the Commission did not issue a notice or order concerning the submission of comments regarding the revised Retail Opt-In Program and revised Standard Offer Program. Therefore, in the event that the Commission does establish a different comment schedule, PPL Electric reserves the right to respond to any further comments filed in this proceeding regarding the revised Retail Opt-In and a revised Standard Offer Programs.

2012-2283641, *et al.*, (Order Entered March 14, 2013). Therefore, PPL Electric will not implement its revised Retail Opt-In Program until it is approved by the Commission and the issues raised by the Commission in the Tentative Order regarding scheduling are resolved.

The revised Retail Opt-In Program presented in PPL Electric's March 11th filing is a customer referral program which will be initiated by PPL Electric through a mailing to all eligible non-shopping customers, and subsequently acted upon by interested customers contacting their assigned EGS.² EGSs who elect to participate in the program will be allocated customers who receive the mailing, based upon participation mailing limits set by individual EGSs. Customers may enroll in the program by contacting their assigned EGS as found in the customer mailing. Customers may sign up by phone, on line, or by returning a tear off card in the postage-paid pre-addressed envelope.

In the March 11th filing, PPL Electric proposed that participating EGSs be required to pay an estimated cost of \$1 per assigned customer mailing. The Company further proposed that this payment will be trued-up with the actual cost of the program, but shall not exceed a payment of \$1 per customer mailing. PPL Electric explained that in the event costs exceed \$1 per customer mailing, the excess will be recovered through PPL Electric's Competitive Enhancement Rider. The Company further stated that the costs are anticipated to be less than \$1 per customer mailing based on the assumption that not all of the prepaid envelopes will be utilized.

PPL Electric also proposed that certain capital costs of the Retail Opt-In Program be recovered in base rates. The Company estimates that it will incur approximately \$21,250 in capital costs for modifications to the billing system, primarily to support the random assignment

² The price will be 5% off the then current Price to Compare ("PTC") for four (4) months, followed by an EGS provided fixed price for eight (8) months. The EGS shall provide the customer a one-time \$50 bonus payment if the EGS serves the customer under the Retail Opt-In Program for at least four (4) months.

of EGSs prior to the customer mailing. These costs will be included in base rates and recovered in the Company's next base-rate proceeding.

1. The Proposed Mechanism to Recover the Cost of the Retail Opt-In Program is Appropriate

Initially, OCA maintains that the Company should not incur any capital costs or other costs until a final determination is made in the Tentative Order proceeding. Further, OCA submits if the Retail Opt-In Program is implemented the program should be designed to cost no more than the \$1 per customer mailing, including the capital costs for modifications to the billing system to support the program. *Id.* Finally, OCA argues that PPL Electric's proposal to recover the capital costs and any excess costs above the \$1 per customer mailing only from customers should be rejected. OCA Comments, p. 3. OCA's arguments should be rejected and PPL Electric's proposal regarding the recovery of costs should be accepted.

PPL Electric concurs with OCA that the Company should not be directed to incur any capital costs or mailing costs until a final determination is made in the Tentative Order proceeding. PPL Electric previously has stated that it will not begin implementation of the Retail Opt-In Program until it has been approved by the Commission. PPL Electric notes that delayed approval will delay the start date of any Retail Opt-In Program from that proposed by the Company.

PPL Electric appreciates OCA's concerns regarding the costs of the program potentially exceeding \$1 per customer mailing; however, to be clear, the Company currently anticipates that the costs of the program will be less than \$1 per customer mailing. As discussed in the March 11th filing, if all of the prepaid envelopes are used, the cost would exceed \$1 per customer mailing; however, it is not anticipated that 100% of the envelopes will be used. Under PPL Electric's revised Retail Opt-In Program customers have the ability to opt-in to the program in

three ways: 1) returning the tear off form via the provided prepaid envelope; 2) directly calling the supplier; or 3) visiting the supplier's website. Because customers can respond to the offer in ways other than using the provided prepaid envelope, and because it is anticipated that some percentage of customers receiving the mailing will not participate in the Retail Opt-In Program, PPL Electric estimates that not all of the envelopes provided with the offers will be used.

Furthermore, in the event that 100% of those receiving a mailing returned the tear off form via the provided prepaid envelope, an amount that would exceed the participation cap for the program, the cost would be \$1.32 per mailing. More specifically, no more than 43% of all customers receiving the mailing could subsequently respond via the prepaid return envelope in order to not exceed the \$1 per mailing limit. If more than 43% of customers receiving the mailing used the prepaid envelope, costs would exceed the \$1 limit.

Therefore, theoretically, if the per mailing costs are in excess of \$1, it will only be this limited amount (above a \$1) that would be recovered through the Competitive Enhancement Rider. PPL Electric believes that having EGSs pay the \$1 per mailing cost, and potentially recovering a limited amount via the Competitive Enhancement Rider, is a reasonable proposal that balances the interest of customers and EGSs, while having EGSs shoulder responsibility for the vast majority of the program's costs.

OCA contends that the Company should not implement a program which might exceed the cost of \$1 per mailing, inclusive of capital costs. However, PPL Electric believes it has developed a program at a minimum cost consistent with a target of \$1 per customer mailing or less. The Company could eliminate the addition of pre-paid envelopes to reduce costs further, but that approach would be contrary to the collaborative discussions that favored the addition of tear off cards and pre-paid return envelopes. If the Commission proceeds with the Opt-In

Program, it should not adopt a \$1 per mailing absolute cost limiter. In no event should it approve a cost mechanism that shifts any portion of the costs to PPL Electric. If the Commission concludes that EGSs should be responsible for no more than \$1 per customer mailing, the remaining costs should be recovered from customers eligible for the Retail Opt-In Program, through the Company's Competitive Enhancement Rider.

For the same reasons, PPL Electric believes that its proposal for recovery of capital costs for modifications to the billing system is appropriate. PPL Electric has proposed to include the \$21,250 in capital costs in base rates and recover such amount in the Company's next base-rate proceeding in order to strike a balance between how the costs of the Retail Opt-In Program are allocated, in the aggregate, between participating EGSs and customers.

2. The Text of *Pro Forma* Direct Mailing

As part of its March 11th filing, PPL Electric submitted two *pro forma* direct mailings that describe the revised Retail Opt-In Program to customers in the Company's low income customer assistance program ("CAP"), known as "OnTrack," and customers not participating in CAP. OCA takes issue with the wording in the letter directed at the non-CAP customers. Specifically, OCA states that the banner heading which states: "Save 5% and get a \$50 Bonus" may leave an incorrect impression about the offer. OCA Comments, p. 3. OCA maintains that the 5% savings will not necessarily be in effect for the entire program period and the letter be modified to reflect this fact. *Id.* OCA suggests that the banner read: "Save An Initial 5% And Get a \$50 Bonus."

PPL Electric believes that the text of the *pro forma* direct mailing to non-CAP customers correctly describes the offer provided to customers, and OCA has not disputed any portion of the text of the letter. The letter states that customers in the program would receive a discounted price -- 5% lower than PPL Electric's PTC at the time of the mailing, and that this price will

remain fixed for the first four months of the 12-month program. The tear off section at the bottom of the letter similarly states that the customer will save 5% off the PTC (at the time of the mailing) and at the end of a four month period, the price may change. PPL Electric believes the text of the letter fully addresses OCA concerns.

B. STANDARD OFFER PROGRAM

As described in full in the March 11th filing, the Company will initiate the Standard Offer Program on an ongoing basis beginning August 1, 2013. The Standard Offer Program will provide participants with a standard 7% discount off the then-current PTC for a twelve month term. The Standard Offer Program will be presented during customer contacts to PPL Electric call centers, for calls other than for emergencies or terminations and similar calls. PPL Electric Customer Service Representatives will provide an overview of the Standard Offer Program to eligible customers; however, any interested customer will be transferred to a separate dedicated team that will provide more detail regarding the Standard Offer Program. This process is designed to ensure that a dedicated team is available to devote all the time necessary to provide more detailed information and answer all of a customer's questions about the Standard Offer Program. The use of the dedicated team will also assist in identifying the costs of the Standard Offer Program.

Regarding the expense of the Standard Offer Program, PPL Electric proposed that costs be recovered from participating EGSs in the following manner:

- \$500 per EGS registration fee for market certification testing costs. This only applies if the EGS is not already rate ready certified.
- Participating EGSs are required to pay a fee of the lesser of \$30 per referred customer or PPL Electric's actual costs per referred customer. Total costs will be tabulated per quarter and charged to all Participating EGSs for that quarter. Any remaining costs shall be included and recovered in the Company's Competitive Enhancement Rider. The allocation of these costs to the Customer Groups will be determined consistent with the cost allocations

accepted by the Commission in PPL Electric's most recent base-rate proceeding.

- Capital costs estimated to be \$522,500 for modifications to the billing system and EDI systems to support the program will be recovered in base rates in the Company's next general rate proceeding.

The non-capital costs (operation, maintenance and administrative) of implementing and administering the Standard Offer Program will be recovered from the participating EGSs and the Company will publish estimated costs of the program at the time of solicitation. The fee the EGSs are required to pay, the lesser of \$30 per referred customer or PPL Electric's actual costs per referred customer, and the allocation of the costs between EGSs and customers is similar to the cost recovery and allocation methods approved by the Commission in other default service proceedings. *See Petition of PECO Energy Company for Approval of its Default Service Program II*, Docket No. P-2012-2283641 (Order Entered February 14, 2013) at p. 13 (approving the fee of the lesser of \$30/customer or actual costs per referred customer) ("PECO Order"); *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company for Approval of Their Default Service Programs*, Docket Nos. P-2011-2273650, *et al.*, (Order Entered February 14, 2013) at p. 14 (same)("Metropolitan Edison Order").

As of the March 11th filing, PPL Electric was in negotiations with two potential third-party providers to assist with the Standard Offer Program by providing an external dedicated team that would provide more detail regarding the Standard Offer Program to interested customers. Currently, PPL Electric is in negotiations with one of the previously mentioned third-party providers to assist with the Standard Offer Program and expects that the cost will be less than \$30 per referred customer.

As discussed in the March 11th filing, the Company also will seek recovery of capital costs, related to the revised Standard Offer Program through a future base-rate proceeding. The Company estimates approximately \$522,500 in capital costs for modifications to the billing and EDI systems shall be included and recovered in the Company's next base-rate proceeding. The allocation of these costs to the Customer Groups will be determined consistent with the cost allocations accepted by the Commission in PPL Electric's most recent base-rate proceeding.

1. The Proposed Mechanism to Recover the Non-Capital Costs of the Standard Offer Program is Appropriate

In its comments OCA, states that it is concerned about the cost of the revised Standard Offer Program and submits that PPL Electric's cost recovery proposal not be adopted. OCA Comments, p. 5. OCA's request should be rejected.

OCA's concerns with the revised Standard Offer Program are twofold. First, OCA takes issues with the proposed \$30 cost cap per referred customer to be recovered from the participating EGS and the fact that the Company proposed to recover non-capital costs incurred above the \$30 via its Competitive Enhancement Rider. OCA Comments, p. 5. Second, OCA is concerned about the capital costs proposed to be incurred as part of the revised Standard Offer Program.³

Based on Commission precedent PPL Electric believes that the requirement that participating EGSs pay a fee of the lesser of \$30 per referred customer or PPL Electric's actual costs per referred customer, with any remaining costs included and recovered in the Competitive Enhancement Rider, is appropriate.

As discussed by PPL Electric in the March 11th filing, and by OCA in its comments, the fee the EGSs are required to pay and the allocation of the costs between EGSs and customers is

³ Issues related to the recovery of capital costs are discussed in the next section.

similar to the cost recovery and allocation methods approved by the Commission in other default service proceedings. PECO Order, p. 13; Metropolitan Edison Order, p. 14. In proposing the above mechanism, PPL Electric's intent was to submit a fee and recovery mechanism in compliance with the Commission's recent determinations in other default service proceedings. As the Commission explained in the orders approving other EDC's default service programs, it viewed the cost recovery and allocation, similar to that proposed by the Company in this proceeding, as a "very reasonable accommodation of all the Parties' positions." *Id.* Therefore, with its submission, PPL Electric is attempting a reasonable accommodation of the EGS interest and the customers' interests with regard to the costs of the revised Standard Offer Program.

OCA's concern that customers will be responsible for the non-capital costs incurred over the \$30 cap is unwarranted. In its comments, OCA states that customers are not provided protection regarding costs of the program they may be asked to bear. OCA Comments p. 5. OCA's concerns are unwarranted because PPL Electric is in negotiations to enter into a contract with a third party vendor to administer the Standard Offer Program and it is expected that the price will be under the cap proposed by PPL Electric on March 11, 2013.

OCA also argues that if ratepayers are asked to support any cost of this program, it submits that PPL Electric should implement a mechanism whereby all excess costs (above the cap) be shared in some manner. OCA, however, does not provide any details regarding its proposal other than to state that sharing should occur. This proposal is mooted by the fact that PPL Electric expects to enter into an agreement with a third party vendor to assist in administering the Standard Offer Program at a per customer cost of less than \$30, therefore, at this time, there is not projected to be any non-capital costs in excess of the proposed cost cap.

2. The Proposed Estimated Capital Costs and the Recovery of these Costs are Appropriate

PPL Electric's proposal for recovery of capital costs (approximately \$522,500), related to the revised Standard Offer Program through a future base-rate proceeding is appropriate. In response to the proposal, OCA argues that the Company should design its program so that the total actual costs of the program, including the capital costs, remain within the capped EGS charge. OCA Comments, p. 6. While PPL Electric understands OCA's position that all costs should be paid by the EGSs, in its March 11th filing PPL Electric attempted to be both accommodating to the desires of the EGSs and customer interests. PPL Electric proposed that the EGS pay for, on a per referred customer basis, those costs that could be reasonably allocated to the EGSs benefiting from the program. However, the Company was also aware of the fact that the EGSs have sought to limit their exposure to certain program costs via the implementation of a cap. PPL Electric was also cognizant of the fact that the Commission had recently set a specific cap on how much an EGSs would be liable for, on a per customer basis, in two other proceedings. Therefore, the Company proposed to use the cap previously adopted by the Commission to accommodate the concerns of the EGSs.

The Company also recognized that the EGSs had advocated previously in this proceeding that they not be required to bear the entire costs of the retail programs. Therefore, in reviewing the totality of the potential costs involved, the Company determined that it would be reasonable, and accommodating to all parties involved, that the capital costs related to modifications to the billing and EDI systems be included and recovered in the Company's next base-rate proceeding. Furthermore, it is more difficult to allocate the capital costs related to modify the billing system because of the nature of the Standard Offer Program. EGSs may elect each quarter whether to

participate in the program or not. Therefore, there is not a fixed group of EGSs that these costs can be allocated to as said group may fluctuate and change. Furthermore, capital costs are a fixed amount, that are not defined by the number of customers who may elect to be referred to an EGS. Thus, PPL Electric cannot build a known and certain amount into the charge to EGSs on an enrolled customer basis that would be guaranteed to recover all capital costs. Because of the difficulty in directly assigning costs related to the modifications to the billing and EDI systems, such cost should be recovered in the Company's next base-rate proceeding. In no event, however, should PPL Electric be required to bear any portion of the cost of the Standard Offer Program if the total costs exceed \$30 per enrolled customer.

The Company believes that it has proposed reasonable fees and reasonable recovery mechanisms in the revised Standard Offer Program that require the participating EGSs to be responsible for certain costs and for customers to be responsible for other costs. Therefore, OCA's concerns should be rejected and the revised Standard Offer Program should be approved by the Commission.

3. Transferring Customers Directly to EGSs

In its comments, OCA recommends that if the Company cannot find a third party dedicated team that would allow the program to operate within the \$30 capped charge for all costs of the program, it should consider implementing a form of program proposed by Duquesne Light Company ("Duquesne"). OCA Comments, p. 6. According to OCA, Duquesne proposed a program that can be implemented and operated within the \$30 per customer capped charge. As described by OCA, under Duquesne's revised program the utility's customer service representative would provide an overview of the program and then transfer interested customers to the participating EGSs for further explanation of the program and enrollment. OCA states that

this approach provides for the direct interaction between the customer and the assigned EGS, and avoids the cost of having an additional call center to explain the program and take an enrollment.

In essence, the Duquesne proposal is a “hot transfer” whereby EDC representatives transfer a customer directly to an EGS customer service representative when the customer requests information regarding the Standard Offer Program. At this time, PPL Electric believes that the proposal that it submitted is the appropriate way for the Company to implement the Standard Offer Program and it does not support directly transferring the customers to EGSs.

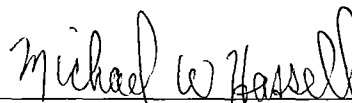
It is PPL Electric’s understanding that FirstEnergy and PECO are using a separate call center approach similar to PPL Electric’s proposal. It is unknown whether EGSs that participated in this proceeding would be amenable to such a proposal as they have not had an opportunity to comment on it in this proceeding. It is also unknown whether EGSs have the ability to handle the volume of the calls that may be referred as part of the Standard Offer Program and there is no evidence in the record on this issue. PPL Electric also is more comfortable with its approach to transfer an interested customer to a third party which has defined scripts to describe the Standard Offer Program. Therefore, due to the issues noted above, the Duquesne approach should not be adopted in this proceeding.

Furthermore, OCA’s request that the Company consider the Duquesne proposal was premised on the speculation that the cost of the Standard Offer Program would be, on a per customer basis, in excess of the \$30. As noted above, PPL Electric is in negotiations to enter into a contract with a third party vendor to administer the Standard Offer Program at an expected per customer cost of less than \$30, therefore, OCA’s underlying assumption is not valid.

III. CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation requests that the Pennsylvania Public Utility Commission accept these reply comments and issue an Order by April 4, 2013, accepting the Company's revised Standard Offer Program described in the March 11th filing and herein.

Respectfully submitted,



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Dated: March 26, 2013

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