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File #: 151904

August 23, 2013

***VIA ELECTRONIC FILING***

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**

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Dear Secretary Chiavetta:

Enclosed for filing is the Petition of PPL Electric Utilities Corporation for Approval of a New Pilot Time-of-Use Program for the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Matthew J. Agen

MJA/jl  
Enclosures

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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Date: August 23, 2013

  
Matthew J. Ager

**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 :

**PETITION OF PPL ELECTRIC UTILITIES CORPORATION  
FOR APPROVAL OF A NEW PILOT TIME-OF-USE PROGRAM**

**I. INTRODUCTION**

PPL Electric Utilities Corporation (“PPL Electric” or the “Company”) hereby files this Petition seeking approval of a new Pilot Time-of-Use (“TOU”) Program,<sup>1</sup> as described herein, which will replace the currently effective TOU rates. PPL Electric files this Petition pursuant to 52 Pa. Code § 5.41 and in compliance with the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Order in *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 Nos. P-2012-2302074, *et al.* (Order Entered May 23, 2013) (“May 23 Order”), which required the Company to file a new time-of-use rate proposal on or before August 23, 2013.

As discussed in detail below, under the proposed new Pilot TOU Program, PPL Electric’s Commission-approved tariff will include a default service TOU rate option, under which the specific TOU rate options and services will be provided by retail electric generation suppliers (“EGS”). The Pilot TOU Program, as proposed by PPL Electric, permits multiple EGSs to offer

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<sup>1</sup> The Pilot TOU Program described in this Petition is a “pilot” program because it is a trial program designed to encourage and assist EGSs in facilitation of TOU rate options during the term of PPL Electric’s June 1, 2013 through May 31, 2015, Default Service Program and Procurement Plan, and also satisfy the requirements of 66 Pa. C.S. § 2807(f)(5).

various TOU rate options to customers, and permits customers to choose the TOU rate option that best satisfies their needs. The TOU rate options offered by the EGS participants, as part of the Pilot TOU Program, will consist of a rate that varies during different time periods, but not as frequently as each hour, and includes off-peak and on-peak periods, with rates during the on-peak periods which are higher than rates during the off-peak periods.

## **II. BACKGROUND**

PPL Electric has been a long-time supporter of alternative rate mechanisms.<sup>2</sup> Following the adoption of Act 129 of 2008 (“Act 129”), P.L. 1592, *relevant portions codified at* 66 Pa. C.S. §§ 2806.1 and 2807, the Company was required, as a default service provider, to offer a TOU rate option to its default service customers.<sup>3</sup> In 2010, PPL Electric proposed a TOU program for Residential and Small Commercial and Industrial (“C&I”) customers that contained an on-peak rate that was higher than the fixed-price default service rate and an off-peak rate that was lower than the fixed-price default service rate. The Commission approved this program, but also held that PPL Electric could not recover lost or decreased revenues resulting from reduced or shifted demand.<sup>4</sup> The effect of this Order was to require PPL Electric to offer a TOU program under which it would not be able to fully recover its costs, which in the Company’s view violated the

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<sup>2</sup> Prior to restructuring, PPL Electric implemented interruptible rates for large customers in the early 1980s, and thereafter implemented several other TOU-type programs, including demand free days, time of day billing options, reduced off-peak billing demand components and interruptible rate options. And, after restructuring and prior to the adoption of Act 129, PPL Electric offered several pilot TOU programs for Residential customers. *See Pa. P.U.C. v. PPL Electric Utilities Corporation*, Docket No. R-00027175, Order Entered April 11, 2002 (discussing the DSR Rider and Residential Service Rate Schedule, which adjusted for seasonal and time-of-day usage). *See Application of Pennsylvania Power & Light Company for Approval of its Restructuring Plan under Section 2806 of the Public Utility Code*, Docket No. R-00973954 at Para. 327, 1998 Pa. P.U.C. LEXIS 129 (Recommended Decision April 1, 1998) (summarizing the Company’s historical TOU-type programs).

<sup>3</sup> *See* 66 Pa. C.S. §§ 2807(f); *Petition of PPL Electric Utilities Corporation for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123945 (Order Entered June 24, 2010)(approving various pilot programs).

<sup>4</sup> *Pa. P.U.C. v. PPL Electric Utilities Corporation*, Docket No. R-2009-2122718, 2010 Pa. P.U.C. LEXIS 461 (Order entered March 9, 2010).

provisions of Act 129 and the Competition Act that guaranteed the default service provider's full cost recovery.<sup>5</sup>

In response to the Commission's Order, PPL Electric proposed a new TOU program for 2011, in which TOU default service rates were set independently of fixed-price default service rates. This program also was approved by the Commission,<sup>6</sup> but quickly proved unworkable and caused a number of serious problems, including a significant undercollection due to unexpected increases in spot market prices, significant customer enrollment when both on-peak and off-peak prices were below the fixed-price default service rate, and rapid and massive customer exits from the TOU program when on-peak and off-peak rates were above the fixed-price default service rate. To avoid exacerbating these problems, in August 2011, PPL Electric requested that the Commission suspend the TOU rates that were to become effective on September 1, 2011, and keep the then-current TOU rates in effect. By order entered August 25, 2011, at Docket No. M-2011-2258733, the Commission granted the Company's request and also ordered the Company to submit a revised TOU plan.

The Company, on September 26, 2011, at Docket No. R-2011-2264771, filed a proposed tariff supplement containing a new TOU program ("2012 TOU program"). In essence, the proposed 2012 TOU program returned to the 2010 model and provided that customers would pay a percentage premium over the fixed-price default service rate in on-peak periods and receive a percentage discount off of the fixed-price default service rate in off-peak periods.

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<sup>5</sup> See 66 Pa.C.S. § 2807(e)(3.9) ("The default service provider shall have the right to recover on a full and current basis, pursuant to a reconcilable automatic adjustment clause under section 1307 (relating to sliding scale of rates; adjustments), all reasonable costs incurred under this section and a commission-approved competitive procurement plan.").

<sup>6</sup> *PPL Electric Utilities Corporation Supplement No. 94 to Tariff Electric – Pa. P.U.C. No. 201-Time of Use Rates*, Docket No. R-2010-2201138 (Order entered December 2, 2010).

On May 1, 2012, PPL Electric submitted a TOU proposal as part of its Default Service Program and Procurement Plan for the period June 1, 2013 through May 31, 2015 (“DSP 2013-2015”). This TOU proposal also was structured to price on-peak service at a percentage premium over the fixed-price default service rate and price off-peak service at a percentage discount off of the fixed price rate, the same as the 2012 TOU program. Under that proposal, fixed price default service wholesale suppliers would have been responsible to provide power to serve TOU customers, and would have been paid the TOU price. On August 30, 2012, after rebuttal testimony was submitted in the DSP 2013-2015 proceeding at Docket No. P-2012-2302074, and only shortly before the start of hearings, the Commission rejected PPL Electric’s 2012 TOU Program. *Pa. P.U.C. v. PPL Electric Utilities Corporation*, Docket No. R-2011-2264771, *et al.*, 2012 Pa. P.U.C. LEXIS 1383 (August 30, 2012). In the August 30, 2012 Order, the Commission also definitively held that TOU service is a default service and expressly stated that, “... based upon the language in the statute, we agree with PPL’s position that the TOU program is a form of default service.” *Id.* at 23. Furthermore, the Commission determined that the Company could recover prior period and ongoing undercollections from all Residential and Small C&I customers, respectively. *Id.* at 23.<sup>7</sup>

Because the Commission’s Order was only entered after rebuttal testimony was filed and shortly before hearings began in the DSP 2013-2015 proceeding, PPL Electric and other interested parties did not have the opportunity to fully react and respond to the Commission’s Order. Therefore, in the DSP 2013-2015 proceeding, PPL Electric advocated that the Commission approve PPL Electric’s as-filed TOU plan as an interim, transitional measure, or

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<sup>7</sup> On the issue of undercollections, the Commission explained that “[f]ollowing certification by the Commission’s Bureau of Audits that the amount of the net undercollection claimed is correct, the accounting method used is consistent with Commission directives and the allocation among rate classes is appropriate, PPL may begin recovery of its TOU undercollection.”

implement an alternative proposal that sought to address the major concerns raised by the ALJ, the Commission and other parties in Docket No. P-2012-2302074.

In its January 24, 2013 Order, in the DSP 2013-2015 proceeding, the Commission approved, with modification, PPL Electric's default service plan for the period June 1, 2013 through May 31, 2015. *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 (Order Entered January 24, 2013) ("January 24 Order"). Regarding TOU rate issues, the Commission stated that PPL Electric should schedule a collaborative with interested stakeholders in order to discuss and resolve any issues regarding the development and implementation of a TOU rate option that will allow the Company to meet its TOU rate requirement. Further, PPL Electric was directed to file a new TOU rate proposal following the conclusion of the collaborative. *Id.*, p. 115.

In the January 24 Order, the Commission further explained that Act 129 does not prohibit a default service provider, such as PPL Electric, from utilizing EGSs to satisfy its TOU rate requirement, citing *Investigation of Pennsylvania's Retail Electricity Market: Recommendations Regarding Upcoming Default Service Plans*, Docket No. I-2011-2237952 (Order Entered December 16, 2011), p. 47 ("*December 16 Upcoming DSP Order*"). The Commission encouraged PPL Electric to give further consideration to a proposal to implement a competitive retail bid process to meet its TOU rate requirement. January 24 Order, p. 115.

#### **A. EXTENSION OF THE CURRENT TOU RATES**

On March 25, 2013, as part of a compliance filing, PPL Electric requested authority to continue its currently effective TOU rate option, including the frozen rates initially approved by the Commission in Docket No. M-2011-2258733 (Order Entered August 25, 2011) and carried forward in Docket No. R-2011-2264771 (Order Entered August 30, 2012), until the Commission

approves a successor program. The Company requested this extension to permit the TOU collaborative, discussed below, to continue its ongoing process and to permit adequate time for the Commission to approve any subsequently filed TOU rate option proposal. The Commission's May 23 Order approved PPL Electric's request and permitted the then currently effective TOU rate option to continue until the Commission approves a successor program. Therefore, PPL Electric's current TOU program with frozen rates, including the applicable E-factor, has been extended and remains in effect. Once approved, the Pilot TOU Program, as described herein, will replace the current TOU program. In the May 23 Order, the Commission also directed PPL Electric to conclude the collaborative and file a new TOU rate proposal within three months of the entry date of the May 23 Order, *i.e.*, file a new TOU proposal on or before August 23, 2013.

## **B. TOU COLLABORATIVE**

Pursuant to the January 24 Order, PPL Electric initiated a collaborative and discussions with the parties regarding potential TOU program alternatives, including bidding out the TOU service. Specifically, PPL Electric convened meetings to discuss the TOU alternatives on February 22, 2013 and April 10, 2013. Parties participated in the meetings in-person and via the telephone. PPL Electric also held a telephone conference on June 12, 2013, to discuss a further revised TOU proposal. PPL Electric circulated several draft TOU proposals with various alternatives, and the parties provided substantive input and comments on the various options.

PPL Electric carefully considered all of the comments and suggestions offered by the other parties, has incorporated many of these suggestions and has revised its proposal to achieve consensus to the extent possible. PPL Electric believes that the collaborative process to address issues related to the TOU rate option has been successful. The collaborative process has given all participants a better understanding of the issues and concerns related to the TOU rate option.

Given the timeframe for the collaborative process, PPL Electric cannot confirm that there is complete agreement on the terms of the TOU Program, although PPL Electric believes there is general concurrence with the terms set forth herein.

### **III. DESCRIPTION OF THE PROPOSED PILOT TOU PROGRAM**

Section 2807(f)(5) of the Code provides that default service providers must submit one or more TOU rate or real-time price plans to the Commission in their default plans. 66 Pa. C.S. § 2807(f)(5). Accordingly, PPL Electric is required to offer a TOU rate option to its default service customers. January 24 Order, p. 92. PPL Electric submits this Petition and the proposed Pilot TOU Program, described herein, to satisfy the aforementioned requirements and will make TOU rates available, on a voluntary basis, to Residential and Small C&I customers.

The Commission, in the January 24 Order, encouraged PPL Electric to give further consideration to a retail bid process to meet its TOU rate requirement. January 24 Order, p. 115. The Commission explained that reliance on EGSs to provide TOU service is not prohibited by Act 129 and a default service provider can utilize EGSs to satisfy its TOU rate requirement. January 24 Order, p. 115.<sup>8</sup> Moreover, as the ALJ explained in the November 9, 2012 Recommended Decision (pp. 88-89) issued in the DSP 2013-2015 proceeding at Docket No. P-2012-2302074, the existence of TOU plans offered by EGSs would be a way for the industry to support the goals of the legislature by shifting load from on-peak times. Based on this guidance, PPL Electric proposes to utilize the retail market and EGSs to satisfy its statutory obligation to offer TOU service to its default service customers.

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<sup>8</sup> See *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 (Order Entered February 15, 2013), p. 6 (permitting West Penn Power Company (“West Penn”) and Pennsylvania Power Company (“Penn Power”), as default service providers, to offer a TOU rate option to its customers, but permitting reliance on EGSs to provide the default TOU service to customers).

The Company has come to this conclusion after careful review and consideration of a variety of issues regarding TOU rates. The implementation of TOU rates has given rise to several difficult and controversial issues. These issues have included, *inter alia*, the proper definition of on-peak and off-peak periods; whether the periods should be different for different classes of customers; how to account for seasonal differences in the electric market; and what steps should be taken to encourage customers to participate in a voluntary TOU program. The Company's proposal relies on the retail market to address these issues. For example, participating EGSs will define the on-peak and off-peak periods and the available customer class options and the customer will choose the desired option. Furthermore, seasonal differences in the electric market will be accounted for in the various offerings because EGSs have the ability to establish the rate options and are permitted to revise the applicable rate options offered during the term of the program. Retail EGSs will be responsible for encouraging customers to participate in the voluntary TOU program.

While the Commission explained in the January 24 Order that PPL Electric could rely on EGSs to provide TOU service and that such an approach is not prohibited by Act 129, PPL Electric requests that the Commission specifically determine that the Pilot TOU Program described herein complies with and satisfies all of its legal and regulatory requirements applicable to the offering of a TOU rate. *See, e.g.*, 66 Pa. C.S. § 2807(f)(5). Previously, in this proceeding, PPL Electric argued that the statute requires the default service provider (not an EGS or any other entity) to submit time-of-use rates to the Commission and requires the default service provider (not an EGS or any other entity) to "offer" time-of-use rates. However, the Commission rejected this argument in the January 24 Order, and explained that reliance on EGSs to provide TOU service is not prohibited by Act 129 and a default service provider can utilize

EGSs to satisfy its TOU rate requirement. January 24 Order, p. 115. Therefore, the Company requests a finding from the Commission that the Pilot TOU Program satisfies PPL Electric's TOU obligation and complies with the law in all respects and that the Pilot TOU Program is not prohibited by Act 129.

#### **A. PILOT TOU PROGRAM OVERVIEW**

As encouraged by the Commission in the January 24 Order, the Company will provide a TOU rate option to customers in its tariff, but will rely on the retail market and EGSs to provide actual TOU service to customers. See January 24 Order, p. 115. Retail EGSs that choose to participate in the TOU Program will offer TOU rate options and provide the TOU service to customers in PPL Electric's service territory. PPL Electric's proposed TOU Program is subject to Commission approval and will be part of the Company's retail tariff.<sup>9</sup> As such, the new Pilot TOU Program will become effective, and available to customers, when the Commission has approved the Company's new Pilot TOU Program and the applicable tariff provisions become effective. The Company requests approval to file the applicable tariff provisions, to be effective on one day's notice, once the Commission has approved the proposed Pilot TOU Program.

To participate in the Pilot TOU Program, EGSs will be required to execute a binding participation form ("Participation Form") which will include a description of the Pilot TOU Program and a participating EGS's responsibilities under the program. The proposed Participation Form is included as Attachment A. During the term of the Pilot TOU Program (the date the applicable tariff sections become effective through May 31, 2015), PPL Electric will periodically ascertain that at least one EGS is providing a TOU rate option via the execution of the Participation Form and regular EGS reports discussed below and in the Participation Form. Participation Form, § 1.12. In the event there is no EGS providing a TOU rate option to

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<sup>9</sup> The Company will file a form of tariff that incorporates the new Pilot TOU Program shortly.

customers as part of the Pilot TOU Program, PPL Electric will implement a contingency program as described below.

## **B. EGS RESPONSIBILITIES AND REQUIREMENTS**

EGSs interested in providing TOU service through the Pilot TOU Program must qualify to participate. In order to qualify, an interested EGS must be licensed as an EGS by the Commission with authority to provide service to Residential and/or Small C&I customers in PPL Electric's service territory. Participating EGSs must provide a TOU rate option to Residential and/or Small C&I customers, from the initiation of the Pilot TOU Program until May 31, 2015, which coincides with the end of the default service plan approved by the Commission in Docket No. P-2012-2302074. EGSs may change their respective rate offers during the term of the Pilot TOU Program, consistent with the schedule discussed below.

An EGS interested in providing PPL Electric's TOU service can submit a completed Participation Form at any time from the initiation of the TOU Program through February 28, 2015. As discussed below, a participating EGS will define the term of the contract between the EGS and the TOU customer; however, the term may not be less than three (3) calendar months. Therefore, to accommodate this three (3) calendar month period, an EGS interested in providing TOU service under the Pilot TOU Program must complete a Participation Form and initiate service under the Program by February 28, 2015, *i.e.*, three (3) calendar months prior to May 31, 2015, the end of the Pilot TOU Program.

A participating EGS will define the on- and off-peak hours and on- and off-peak rates that it will offer to customers. The TOU rate options offered by the participating EGSs will consist of a rate that varies with time of use, but not as frequently as each hour, and includes off-peak and on-peak periods, with rates during the on-peak periods which are higher than rates

during the off-peak periods. The ability to define the on- and off-peak periods grants the EGSs flexibility to meet customers' needs and desires for a TOU service.

An EGS participating in the Pilot TOU Program will define the term of the contract between EGS and customer, which may not be less than three (3) calendar months,<sup>10</sup> coinciding with the changes to the Price-to-Compare ("PTC").<sup>11</sup> Participation Form, § 1.3. However, participating EGSs are not required to change their price every quarter; it is up to an EGS to determine if it wants to make quarterly revisions to the TOU rate options offered to customers.

A participating EGS must create and maintain a webpage, which will be cross-referenced by PPL Electric on its TOU webpage that provides details about the EGS's available TOU rate options for the current quarter including rate options and rates currently available. Participation Form, § 1.7. The TOU rate options posted on the EGS's webpage must be the same as reported to the Company in the quarterly reports, and the EGS must explicitly state that the rate option is being offered as part of the PPL Electric Pilot TOU Program.<sup>12</sup> EGSs are free to provide any tools or calculators necessary to assist customers in determining whether the EGS's TOU rate option is an appropriate alternative to other service options.

A participating EGS must provide PPL Electric with an initial report and quarterly reports thereafter, which includes a description of the TOU rate options being offered and the pricing for on- and off-peak hours for the upcoming quarter. Participation Form, § 1.12.

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<sup>10</sup> As discussed below, a Participating EGS may not charge a termination fee to a customer that no longer chooses to participate in the EGS's rate offering.

<sup>11</sup> This three (3) calendar month term also correlates to the quarterly reports that each participating EGS must provide PPL Electric which includes a description of the TOU rate options being offered by said EGS and the respective pricing for on- and off-peak hours for the upcoming quarter. Therefore, the term of the contract between the EGS and the TOU customer may not be less than three months in length; however, an EGS may revise the TOU rate option that it offers to new customers every quarter and these rate options will be reported to the Company in a quarterly report.

<sup>12</sup> Such references should include cross-references to the applicable PPL Electric tariff provisions, the Commission docket number for this proceeding and the Commission order approving the new Pilot TOU Program.

Participating EGSs also will be required to report the TOU rates and other rate option details to PPL Electric, as specified in the Participation Form, and this information can be provided to the Commission upon request. *Id.* EGSs will be required to utilize the EDI process for data/information exchange. Additionally, to participate in the Pilot TOU Program, EGSs must return “bill ready” data for PPL Electric to include on customers’ bills. Participation Form, § 1.6.

A participating EGS may not charge an early termination penalty or fee to any customer that leaves the TOU rate option offered by the EGS as part of the Pilot TOU Program. Participation Form, § 1.3(c). Furthermore, if a participating EGS decides to opt-out of the Pilot TOU Program, it is required to notify all of its customers taking service under the Pilot TOU Program that it is no longer part of the program. Participation Form, § 1.4. However, the EGS must continue to serve any existing TOU customers under the terms of the service agreement between the customer and the EGS for TOU service.

### **C. CUSTOMER PARTICIPATION**

Participation in the Pilot TOU Program is voluntary for customers and the customer determines which EGS rate option to elect.<sup>13</sup> All Residential and Small C&I customers, including low-income customers, are eligible to participate in the TOU Program. Customers do not need to be receiving fixed price default service from PPL Electric to participate in the Pilot TOU Program.<sup>14</sup> This Pilot TOU Program and the EGS rate options offered thereunder will be

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<sup>13</sup> See *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 (Order Entered February 15, 2013), p. 6 (it is reasonable for TOU customers to designate a specific EGS as their TOU provider).

<sup>14</sup> Customers will not necessarily be required to return to default service to participate in the Pilot TOU Program. Customers participating in the Pilot TOU Program will initially begin service according to his or her bill cycle and the 11-day enrollment rule. New and moving customers can be served by an EGS starting with his or her initial meter read as a “Day 1 Enrollment” if enrollment is received by the Company eleven days or more in advance of the customer’s connect date. In the event that there is a gap in service prior to the initiation of service under the Pilot

available to PPL Electric's Residential and Small C&I default service customers, as well as any other Residential and Small C&I customers that choose to participate, subject to any terms of a customer's existing contract for service from an EGS. Customers, including net metering customers, who volunteer to participate in an EGS's rate option offered as part of the Pilot TOU Program will be treated as shopping customers and all of the rules applicable to shopping customers will apply. A customer may leave a participating EGS's rate option under the Pilot TOU Program subject to the Commission's switching rules.

To inform customers about the new Pilot TOU Program, PPL Electric will include an article in "PPL Connect" announcing the implementation of the Pilot TOU Program. In the "PPL Connect" announcement, the Company will briefly summarize the program and inform customers that more information can be found on a dedicated PPL Electric or participating EGS webpage, or customers can call PPL Electric or a participating EGS to receive more information. The Company will not promote any specific TOU rate option offered by an EGS that is participating in the program. It is a participating EGS's responsibility to publicize and market their participation in the Pilot TOU Program and the TOU rate options provided thereunder.

Customers who call PPL Electric and indicate interest in a TOU rate will be directed to a PPL Electric-hosted website that will provide links to each participating EGS's TOU rate offerings. The TOU webpage is anticipated to operate in the same manner as the current "choose your supplier page" maintained by PPL Electric.<sup>15</sup> On the "choose your supplier page," the screen indicates that information on specific EGS offerings is located on an external (non-PPL Electric) website, [www.PaPowerswitch.com](http://www.PaPowerswitch.com). Similar to the "choose your supplier page," the TOU webpage would provide links to the participating EGS's TOU webpage. Also similar to

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TOU Program, a customer may receive default service from PPL Electric prior to being switched to a supplier given switching rules.

<sup>15</sup> <https://www.pplelectric.com/at-your-service/choose-your-supplier.aspx>.

the current procedures related to retail shopping, PPL Electric will not provide any EGS specific TOU rate information directly on its website.

Additionally, in the event that a customer interested in TOU service does not want to review the TOU information via PPL Electric's website, the Company will, at the customer's request, send a letter containing the same information posted on the PPL Electric-hosted website.

PPL Electric will administer the program via its tariff and the Participation Forms; however, it is the EGS's responsibility to educate customers about specific TOU rate options.

### **1. CAP Customers**

Customers in the Company's low income customer assistance program ("CAP"), known as "OnTrack," will be permitted to participate in the Pilot TOU Program. PPL Electric will provide information on its TOU Program website which explains that OnTrack customers already receive a reduced monthly bill based upon his or her ability to pay and therefore may not see a change in his or her monthly payment if enrolled in the Pilot TOU Program. Additionally, EGSs that participate in the TOU Program are required to inform OnTrack customers that if they participate in OnTrack, and choose to participate in a TOU rate option, they may not see a reduction in their monthly payment. Participation Form, § 1.8.

Similar to the potential issues raised by the Company in the DSP 2013-2015 proceeding regarding the retail market programs, the Company is concerned about the participation of CAP customers in a TOU rate option.<sup>16</sup> Specifically, PPL Electric is concerned that OnTrack

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<sup>16</sup> In the DSP 2013-2015 proceeding, at Docket No. P-2012-2302074, the Company expressed concern about the participation of CAP customers in the retail market programs implemented as part of DSP 2013-2015. PPL Electric explained that CAP customers should be permitted to participate in the proposed Opt-In and Standard Offer Customer Referral programs. However, PPL Electric explained that it was concerned that OnTrack customers' shopping choices may be increasing costs to non-CAP and that OnTrack customers may be making shopping decisions that make it more difficult to stay on the program. This is harmful to OnTrack customers and, through non-payment, ultimately may increase costs borne by non-CAP customers. The Commission determined that OnTrack customers should be permitted to participate in the retail market programs. *See* January 24 Order, pp. 159-163.

customers' shopping choices may increase costs to non-CAP residential customers who pay the cost of the program and OnTrack customers may be making shopping decisions that ultimately render it harder for them to remain in the OnTrack Program. However, the Company believes that OnTrack customers should be treated the same as all other customers, and be permitted to participate in the Pilot TOU Program. Therefore, to ensure that CAP customers are treated the same as all other customers, and that CAP customers are aware of the particular rate implications of choosing a TOU rate, PPL Electric proposes that both the Company and participating EGSs provide notice to CAP customers that a TOU rate option may not be the lowest rate alternative for the CAP customer. This notification approach is similar to the approach approved by the Commission with regard to the retail market programs, whereby OnTrack customers were informed about the rate options, but also informed that any option should be carefully evaluated.<sup>17</sup>

## **2. Existing TOU Customer Participation**

Customers currently receiving service under PPL Electric's existing TOU rate option may move directly to the Pilot TOU Program, if the customer chooses to participate. However, if a current TOU customer does not choose to participate in the Pilot TOU Program and does not choose to participate in an EGS's TOU rate option, within a specified time frame, the customer will be returned to PPL Electric's fixed price default service. Customer participation in a TOU program is voluntary, and it therefore would not be appropriate to transfer a current TOU customer into a new Pilot TOU Program absent an affirmative election to participate. Prior to returning current TOU customers to fixed price default service, PPL Electric will send the

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<sup>17</sup> As part of the Opt-In and Standard Offer Customer Referral programs, the Commission approved a process whereby OnTrack customers would be informed that they already receive a reduced monthly bill based upon their ability to pay, and that they may not see a reduction in their monthly payment. OnTrack customers are encouraged as part of the retail marketing programs to carefully review any retail offer to make sure that it suits his or her needs.

existing TOU customers a letter 45 days prior to the start of the Pilot TOU Program notifying them that the current TOU rate will terminate. The letter will also explain that if they do not choose to participate in an EGS's TOU rate option, by a date certain, they will be transferred to PPL Electric's fixed price default service. The letter will also notify the current TOU customers about the Pilot TOU Program and inform the customer how to participate in the new program if they are interested.<sup>18</sup> PPL Electric proposes to maintain the current TOU rates in effect until each customer's first meter read date after the implementation of the Pilot TOU Program to provide adequate time for the current TOU customers to switch seamless to the new program without returning to fixed price default service. However, after this grace period expires and the Pilot TOU Program is implemented, current TOU customers that have not elected to receive service from an EGS will be returned to fixed price default service.

#### **D. IMPLEMENTATION SCHEDULE**

PPL Electric anticipates that it will require a certain amount of lead time to implement the new Pilot TOU Program once it is approved. For example, some time will be required to obtain executed Participation Forms from EGSs, send letters to the current TOU customers and ensure that the EGSs and PPL Electric build the required webpages. Therefore, PPL Electric requests that it be permitted to implement and make the Pilot TOU Program effective concurrent with the quarterly PTC change that occurs no less than ninety days after the Commission issues a final order approving the Pilot TOU Program.

#### **E. TOU CONTINGENCY PLAN**

Pursuant to Section 2807(f)(5) of the Code, PPL Electric must offer a TOU rate option to its customers. Therefore, the Company proposes the following contingency plan in the event that

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<sup>18</sup> In order to be able to provide the current TOU customers with an EGS's TOU rate option 45 days prior to the start of the Pilot TOU Program, participating EGSs will be required to launch their TOU websites with details about the TOU rate options 45 days prior to the start of the Pilot TOU Program.

the Pilot TOU Program is not successful. The Company is requesting approval for a contingency plan in this filing to ensure that a backup plan can be implemented quickly, if necessary, and to avoid the need to return to the Commission to modify its plan.<sup>19</sup>

In the event no EGSs execute the TOU Program Participation Form at the initiation of the program or if all of the participating EGSs opt-out of the program or default on the program's requirements during the term of the Pilot TOU Program resulting in no TOU rate option being offered to Residential or Small C&I customers by an EGS as part of the program, PPL Electric will offer the following TOU rate options to customers, as applicable. At that point it would be appropriate for PPL Electric to quickly step in and provide a TOU rate option for its customers. Once the contingency plan is put in place, PPL Electric would then offer the TOU rate option described above, until May 31, 2015.

For Residential customers, on-peak hours for the TOU rate option will be set from noon to 7 p.m. Monday through Friday, excluding Saturday, Sunday and PJM holidays. The on-peak rate, for the Residential customers, will be determined by adding a 15% adder to the then current PPL Electric Fixed Price Generation Supply Charge-1 ("GSC-1") Charge and the off-peak rate will be determined by subtracting a 4% discount off the then current Fixed Price GSC-1 Charge (less the E Factor).<sup>20</sup>

For Small C&I customers, on-peak hours for the TOU rate option will be from 7 a.m. to 7 p.m. Monday through Friday, excluding Saturday, Sunday and PJM holidays. The on-peak rate, for the Small C&I customers, will be determined by adding a 15% adder to the then current PPL

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<sup>19</sup> The contingency plan discussed herein will also be contained in the forthcoming form of tariff. See footnote 9, *supra*.

<sup>20</sup> The Commission approved the TOU plans of West Penn and Penn Power that included a set adder to and discount off of what those entities defined as the price to compare in cents representing the cost of West Penn or Penn Power to provide default service to a customer. See *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 (Order Entered February 15, 2013).

Electric Fixed Price GSC-1 Charge and the off-peak rate will be determined by subtracting a 8% discount off the then current Fixed Price GSC-1 Charge (less the E Factor). The contingency plan can be implemented separately for Residential customers or Small C&I customers. For example, if a TOU rate option is available for Residential customers, but not Small C&I customers, only the contingency plan applicable to the Small C&I customers will be implemented.

PPL Electric believes that the on- and off-peak periods proposed above for the TOU Residential and Small C&I customers are appropriate. The adders and discounts included with this contingency plan are designed so that the aggregate total rate is essentially revenue neutral for those customers that do not change their usage habits. Furthermore, the Company believes that the adders and discounts are reasonable and appropriate to incent a customer to shift load from on-peak to off-peak periods.

The contingency TOU rate option, described above, will be implemented not more than 30 days from the date notification is received by PPL Electric confirming that no EGS is offering a TOU rate option, to the applicable customer group, pursuant to the Pilot TOU Program. PPL Electric will continue to offer the contingency TOU rate option until May 31, 2015, *i.e.*, through the end of the currently effective Default Service Program and Procurement Plan.

Costs related to the implementation of this contingency TOU rate option will be recovered through the Generation Supply Charge. TOU contingency plan over/undercollections will be reconciled across all default service customers by rate class, *i.e.*, Residential TOU over/undercollections will be reconciled over all Residential default service load and Small C&I over/undercollections will be reconciled over all Small C&I default service load. *See Pa. P.U.C.*

v. *PPL Electric Utilities Corporation*, Docket No. R-2011-2264771, 2012 Pa. P.U.C. LEXIS 1383 (August 30, 2012).

#### **F. RECONCILIATION**

As instructed by the Commission, in the January 24 Order, as part of the revised default service plan, PPL Electric will continue using its current quarterly reconciliation methodology for its Rate Schedule GSC-1 rates. January 24 Order, p. 70. PPL Electric notes that in Docket No. R-2011-2264771 (Order Entered August 30, 2012), the Commission held that PPL Electric may recover the net undercollection of its prior period TOU program from all default service customers, by customer class, following certification by the Commission's Bureau of Audits that the amount of the net undercollection claimed is correct and has been accounted for consistent with Commission directives. The Company is proposing to defer implementation of this joint reconciliation pending the Commission approval of the proposed Pilot TOU Program.

#### **IV. THE PILOT TOU PROPOSAL IS IN THE PUBLIC INTEREST**

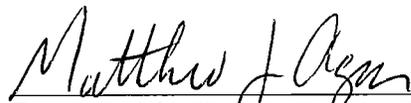
PPL Electric believes that the proposed Pilot TOU Program is in the public interest and should be approved. The proposed program is consistent with the Commission's guidance in the January 24 Order. As discussed above, Section 2807(f)(5) of the Code provides that default service providers must submit one or more TOU rate or real-time price plans to the Commission in their default plans. 66 Pa. C.S. § 2807(f)(5). If approved by the Commission, the TOU Program will satisfy this requirement because a mechanism will be established whereby a TOU rate option is offered to PPL Electric's default service customers. PPL Electric proposes to utilize the retail market and EGSs to assist in providing TOU service as suggested by the Commission. The reliance on EGSs to provide TOU service resolves various complicated issues that have historically plagued prior TOU efforts. As discussed above, these complicated issues include, *inter alia*, the definition of on-peak and off-peak periods; whether different classes of

customers should have different on-peak and off-peak periods; and how to encourage customers to participate in a voluntary program. The Pilot TOU Program attempts to resolve these issues by permitting EGSs to define the on-peak and off-peak periods and the available customer class options. Moreover, retail EGSs will be responsible for encouraging customers to participate in the voluntary program.

**V. CONCLUSION**

For the reasons set forth above, PPL Electric Utilities Corporation requests that the Commission approve the Pilot Time-of-Use Program described above and in the attachment hereto.

Respectfully submitted,

  
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Of Counsel:

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Dated: August 23, 2013

Attorneys for PPL Electric Utilities Corporation

# **Attachment A**

## PILOT TIME-OF-USE PROGRAM BINDING PARTICIPATION FORM

In order to be included in PPL Electric Utilities Corporation's ("PPL Electric") Pilot Time-of-Use ("TOU") Program as an Electric Generation Supplier ("EGS") participant, \_\_\_\_\_ ("EGS Participant") agrees to be bound by the terms and conditions set forth in this Binding Participation Form, which shall constitute a firm offer to supply service in accordance with the Pilot TOU Program approved by the Pennsylvania Public Utility Commission's ("PUC" or "Commission") at Docket No. P-2012-2302074, and applicable Pennsylvania Law and regulations.

1. The EGS Participant hereby agrees as follows:
  - 1.1 The EGS Participant acknowledges and understands that the term of this Binding Participation Form with PPL Electric is effective from the date the Binding Participation Form is fully executed through May 31, 2015. During the term of this Binding Participation Form, EGS Participant must offer a TOU rate option based upon the terms of this Binding Participation Form and consistent with the information contained in the quarterly TOU Summary Report discussed in Section 1.11, below.
  - 1.2 The EGS Participant will define the on- and off-peak hours, and the on- and off-peak rates that it will offer to customers as part of its TOU rate option under the TOU Program. The TOU rate options offered by the EGS participant shall consist of a rate that varies during different time periods, but not as frequently as each hour, and includes off-peak and on-peak periods, with rates during the on-peak periods which are higher than rates during the off-peak periods.
  - 1.3 In addition to the above requirements the EGS Participant will also implement the following rules:
    - (a) The EGS Participant will define and abide by the on- and off-peak hours and the on- and off-peak rates it initially reports to the Company at the initiation of the TOU Program, and in quarterly reports submitted thereafter (the "TOU Summary Report"), as discussed in Section 1.11 below;
    - (b) The EGS Participant will define the term of the contract between EGS and customer, which may not be less than 3 calendar months, coinciding with quarterly changes in PPL Electric's price-to-compare ("PTC");
    - (c) The EGS Participant will issue notice to customers participating in the Pilot TOU Program that there is no early termination penalty or fees to any TOU customer who leaves the TOU rate option offered by the EGS Participant as part of the Pilot TOU Program at any time during the term of the contract; and,
    - (d) In accordance with the provisions of 52 PA code Chapter 54 (or its successor provisions), prior to the termination of the contract with a customer under the Pilot TOU Program, the EGS Participant will notify

the customer regarding the conclusion of the contract, and its offer concerning the terms and conditions for continuation of service. Once notified about the conclusion of the contract customers can elect to enter into another TOU rate option with that EGS, shop with a different EGS, or return to default service.

- 1.4 The EGS Participant will issue notice to customers enrolled in its TOU rate option if the EGS Participant is no longer participating in the PPL Electric Pilot TOU Program and/or the TOU rate option that the customer is enrolled in is no longer part of the PPL Electric Pilot TOU Program.
- 1.5 The EGS Participant must be licensed as an EGS by the PUC with authority to provide service to Residential and/or Small Commercial and Industrial (“C&I”) customers in PPL Electric’s service territory. The EGS Participant must meet all of the obligations and requirements of a PUC licensed EGS. The EGS Participant must be a member of PJM and be a signatory to any pertinent PJM agreements, as applicable.
- 1.6 The EGS Participant must be certified by PPL Electric for Bill Ready Billing.
- 1.7 The EGS Participant will create and maintain a webpage, to be referenced by PPL Electric, giving details about the available TOU rate option(s) for that quarter. This website must be updated (not more frequently than quarterly, coinciding with the PPL Electric PTC change) if the available TOU rate option has changed and must match the information provided to PPL Electric in the TOU Summary Report. The EGS Participant must also explicitly refer to that fact that the rate option is being offered as part of the PPL Electric Pilot TOU Program.
- 1.8 The EGS Participant must accept all eligible Residential and/or Small C&I customers who elect to participate in the Pilot TOU Program.
  - (a) Customers in PPL Electric’s low income customer assistance program, known as “OnTrack,” are permitted to participate in the Pilot TOU Program. The EGS Participant shall inform OnTrack customers that if they participate in OnTrack, and choose to participate in a TOU rate option, they may not see a reduction in their monthly payment.
- 1.9 The EGS Participant must comply with all applicable PUC customer notification requirements.
- 1.10 This Binding Participation Form includes terms and conditions for an EGS’s participation in the Pilot TOU Program. This document should be used in conjunction with PPL Electric’s Electric Generation Supplier Coordination Tariff. If any discrepancies exist between the terms of Binding Participation Form and the Electric Generation Supplier Coordination Tariff, the Binding Participation Form shall take precedent.
- 1.11 The EGS Participant must maintain its own set of independent records for review upon request by the Commission, for future evaluation of the Pilot TOU Program success.

1.12 EGS Participants must submit an initial TOU Summary Report to the Company at least 45 days prior to the initiation of the Pilot TOU Program and the quarterly TOU Summary Reports shall be submitted to PPL Electric at least 5 days prior to the start of a PTC quarter and quarterly thereafter. The initial and the quarterly TOU Summary Reports shall include:

- (a) The available TOU rate options for the upcoming quarter.
- (b) The on- and off-peak hours and rates per rate option offered.
- (c) Term of the customer contracts available per rate option.
- (d) Changes or alterations of new TOU rate options from the previous quarter's rate options (if applicable).
- (e) Summary of all TOU rate options offered by the EGS Participant under the Pilot TOU Program (to the date of the issued report) with the number of customers, by class, on each rate option.

The information in the TOU Summary Report shall only pertain to TOU rate options being offered under PPL Electric's Commission-approved Pilot TOU Program, and not to any other programs the EGS Participant may offer.

2. The EGS Participant warrants and agrees that it hereby undertakes all responsibilities and service delineated herein as to TOU customers that enter into a contract with the EGS Participant, and expressly absolves PPL Electric from any and all liability for EGS Participant's failure to perform and/or its default with respect to such responsibilities and service.
3. PPL Electric warrants and agrees that it hereby undertakes all responsibilities and service delineated herein as to TOU customers that enter into a contract with the EGS Participant, and expressly absolves EGS Participant from any and all liability for PPL Electric's failure to perform and/or its default with respect to such responsibilities and service.
4. Participation in the Pilot TOU Program shall constitute an agreement by EGS Participant to abide by the terms and conditions of the Pilot TOU Program as set forth herein and approved by the Commission. In the event of a material default by an EGS Participant in any of its obligations under the Pilot TOU Program, PPL Electric shall have the right to provide written notice of the default to the EGS Participant, directed to the Contact listed in the Contact Form, appended hereto. If the EGS Participant does not cure the default within 10 business days from the date of the written notice, PPL Electric shall have the right to terminate the EGS Participant from further participation in the Pilot TOU Program. PPL Electric also may seek whatever remedies to which it may be entitled before the Commission, in a court of law or otherwise, including reasonable attorneys' fees. Any court action shall be litigated in the Court of Common Pleas for Lehigh County or in the District Court for the Eastern District of Pennsylvania in Allentown.

5. The EGS Participant acknowledges that if PPL Electric is not able to confirm, as required by Section 1.5, above, that the EGS Participant is a licensed EGS in Pennsylvania and a member of PJM, as applicable, the EGS Participant will not be qualified to participate in the Pilot TOU Program.
6. PPL Electric and EGS Participant acknowledge that the Pilot TOU Program is only available to Residential and/or Small C&I customers in the Company's service territory.
7. The submission of this Binding Participation Form to PPL Electric shall constitute the EGS Participants' acknowledgment and acceptance of all the terms, conditions and requirements of the Pilot TOU Program contained herein and approved by the Commission at Docket No. P-2012-2302074.
8. The undersigned represents and warrants that he/she has the authority to act on behalf of, and to bind, the EGS Participant to perform the terms and conditions and otherwise comply with all obligations stated herein.
9. Any and all matters of dispute between the PPL Electric and the EGS Participant, whenever arising, shall be governed, construed and enforced in accordance with the laws of the Commonwealth of Pennsylvania regardless of the theory upon which such matter is asserted.
10. The EGS Participant must affirmatively check either or both participation groups below, an EGS Participant may elect to offer a TOU rate option under the Pilot TOU Program to both the Residential and Small C&I Customer Groups or only to one of the groups.

1. Participation in Residential Customer Group

2. Participation in Small C&I Customer Group

Signature of Authorized Individual: \_\_\_\_\_

Name of Authorized Individual (*print*): \_\_\_\_\_

Title of Authorized Individual (*print*): \_\_\_\_\_

Date Signed: \_\_\_\_\_

11. As part of your submission to participate in the Time-of-Use Program, please send one (1) original of this Binding Participation Form to:

PPL Electric Utilities Corporation  
 Time-of-Use Program  
 Two North Ninth Street, GENN5  
 Allentown, PA 18101  
 Attn: Energy Procurement Team

## Contact Form

Please provide contact information for purposes of the pilot Time-of-Use Program (*items with an \* are required*):

Company:\* \_\_\_\_\_

Contact Name:\* \_\_\_\_\_

Contact Title:\* \_\_\_\_\_

Address:

Street 1\* \_\_\_\_\_

Street 2 \_\_\_\_\_

City\* \_\_\_\_\_

State\* \_\_\_\_\_

Zip Code\* \_\_\_\_\_

Phone Number:\* \_\_\_\_\_

E-mail Address:\* \_\_\_\_\_

Fax: \_\_\_\_\_