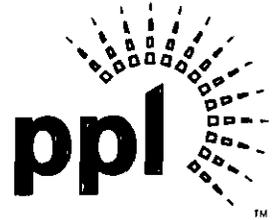


**Paul E. Russell**  
Associate General Counsel

**PPL**  
Two North Ninth Street  
Allentown, PA 18101-1179  
Tel. 610.774.4254 Fax 610.774.6726  
perussell@pplweb.com



**VIA FEDERAL EXPRESS**

November 26, 2013

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

**RECEIVED**

**NOV 26 2013**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: EDC Customer Account Number  
Access Mechanism for EGSs  
Docket No. M-2013-2355751**

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric" or the "Company") is PPL Electric's compliance plan filed pursuant to the Public Utility Commission's ("PUC" or the "Commission") final order entered on July 17, 2013 in the above-captioned proceeding. The enclosed compliance plan sets forth PPL Electric's plans for developing a passcode protected secure website portal that will provide electric generation suppliers ("EGSs") with access to customer account numbers consistent with the Commission's final order.

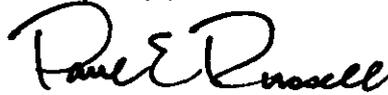
As directed by the Commission in its final order, PPL Electric is providing a copy of its compliance plan to the Commission's Office of Competitive Markets Oversight. In addition, the Company is providing copies of its compliance plan to the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Energy Association of Pennsylvania.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on November 26, 2013, which is the date it was deposited with an overnight express delivery as shown on the delivery receipt attached to the mailing envelope.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding the enclosed compliance plan, please contact me or Cheryl Oehler, PPL Electric's Manager-Retail Supplier Coordination/Scheduling/Settlement, at (610) 774-6567.

Very truly yours,

A handwritten signature in black ink that reads "Paul E. Russell". The signature is written in a cursive style with a large, prominent initial "P".

Paul E. Russell

Enclosures

cc: Kirk H. House, Esq.  
J. Edward Simms, Esq.  
Tanya J. McCloskey, Esq.  
Mr. John R. Evans  
Terrance J. Fitzpatrick, Esq.  
Mr. Daniel Mumford  
Patricia Weidt, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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EDC Customer Account Number Access : Docket No. M-2013-2355751  
Mechanism for EGSs :

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**PPL ELECTRIC UTILITIES CORPORATION  
COMPLIANCE PLAN**

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**I. INTRODUCTION**

On April 18, 2013, the Public Utility Commission ("PUC" or the "Commission") issued a Tentative Order inviting interested parties to file comments on the issues related to providing a mechanism for an Electric Generation Supplier ("EGS") to access an Electric Distribution Company ("EDC") customer account number when that number is unavailable at the time of an in-person enrollment.<sup>1</sup> In addition to the various matters discussed in the Tentative Order, the Commission also invited comment on thirteen specific questions. PPL Electric Utilities Corporation ("PPL" or the "Company") and fifteen other parties filed comments in response to the Tentative Order.

On July 17, 2013, the Commission entered a final order addressing proposals from its Office of Competitive Market Oversight ("OCMO") to provide procedures to facilitate EGS access to the EDC account numbers of newly enrolled

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<sup>1</sup> EDC Customer Account Number Access Mechanism for EGSs, Docket No. M-2013-2355751, Tentative Order entered on April 18, 2013.

customers in instances where the account number is not available from either the customer or from the Eligible Customer List (“ECL”).<sup>2</sup>

In its July 17 order, the PUC directed all major Pennsylvania EDCs to file compliance plans within six months of the entry date of the order, i.e., on or before December 16, 2013. The Commission specified that the filings should demonstrate the EDC’s plans for developing a passcode protected secure website portal that will provide EGSs with access to customer account numbers for all EDC rate classes. Finally, the plans should include the EDC’s expected costs and its proposed mechanism for recovering those costs. PPL Electric hereby submits its compliance plan, as described in more detail below.

## II. COMPLIANCE PLAN

### A. Summary

Attachment A is a matrix that outlines the EDC/EGS Account lookup solution that PPL Electric plans to implement with the next release of its Supplier Web Portal. That release is scheduled to take place on or before February 12, 2014. As shown on Attachment A, PPL Electric’s lookup solution meets the Commission’s requirements for an EDC customer account number access mechanism for EGSs:

- The access mechanism will be a passcode-protected website portal.
- Response time will be almost instantaneous.
- EGSs must submit customer specific data to PPL Electric for lookup.

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<sup>2</sup> *EDC Customer Account Number Access Mechanism for EGSs*, Docket No. M-2013-2355751, Final Order entered on July 17, 2013.

- PPL Electric will provide three alternative responses to ensure release of accurate data.
- A one-to-one match between search criteria and account number will be required.
- PPL Electric will maintain a user access record.
- PPL Electric's system will support attestation of a Letter of Authorization ("LOA").

B. Timeline

As described above and on Attachment A, PPL Electric plans to facilitate the access mechanism for EGSs through an enhancement of the current PPL Electric supplier web portal, on or before February 12, 2014.

C. Cost Recovery

This project is included as part of PPL Electric's Commission-approved Smart Meter Plan, and the costs of implementation will be recovered through PPL Electric's Smart Meter Rider. Those costs are not expected to exceed a one-time charge of \$10,000. Ongoing costs of administering and maintaining the system and storage of data is not expected to exceed \$10,000 annually and will be included in future distribution base rate filings.

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<b>PUC Requirements:</b>	
EDCs are directed to provide a customer account number access mechanism via a passcode-protected website portal.	New functionality will be added to PPL Electric's supplier web portal which is already passcode protected and secure. All active customer accounts can be accessed by EGSs with appropriate Letter of Authorization (LOA) and identification documentation.
Use of web based portal renders response time limits moot.	Via PPL Electric's supplier web portal, response time is almost instantaneous.
In order to avoid inadvertent release of unauthorized data, customer specific identifying data including customer's full name, service street address and postal code are required data elements to be submitted to EDCs.	<p>PPL Electric's search screen will support the following criteria:</p> <ul style="list-style-type: none"> <li>* Customer full name and service address (number, street name, city, state &amp; zip) and will only return the account if there is a one-to-one match.</li> <li>* PPL Electric's web portal account look up screen includes the separation of data fields and employs a drop-down box for data elements such as street type.</li> <li>* In addition to the three required data elements, PPL Electric will facilitate the use of additional optional search criteria including phone number, email address, social security number, and meter number. The addition of any of these optional data elements will increase the probability of a one-to-one account match for EGSs.</li> </ul>
To ensure the release of accurate data, there are three possible responses to the account look up: The correct account number, "NO HIT", or "MULTIPLE HITS".	<p>PPL Electric plans to support the three responses as follows:</p> <ul style="list-style-type: none"> <li>* If a one-to-one match is found using the required data elements, display the customer bill account number along with the search criteria that the Retail Supplier entered for the request.</li> <li>* If more than one match is found, "Multiple accounts found – refine search criteria" error message will be returned along with the search criteria that the Retail Supplier entered for the request.</li> <li>* If no account is found, "No account found – refine search criteria" error message will be returned along with the search criteria that the Retail Supplier entered for the request.</li> <li>* Only information on active accounts will be eligible to be returned to an EGS.</li> </ul>
Safeguards are required to ensure that account numbers are accurately provided only to customer and supplier involved.	As a method of safeguarding the data confidentiality, PPL Electric will ensure that there is a one-to-one match between all search criteria entered and account number returned. In addition, the supplier web portal existing event logging capability will be enhanced as described below, and this data can be reviewed by the PUC upon request.
Utility is required to maintain a record of who accessed the system, when, what data was obtained. The data must be retained for at least three years. This is coupled with reporting requirements.	The use of user-names and passwords will allow PPL electric to maintain a record of who accessed the system, when they did so, and what data was obtained. Each time a supplier submits an account lookup request, PPL Electric will create an audit trail, that captures the following information: supplier name, user name, date and timestamp of request. For successful bill account retrievals, PPL Electric will also capture bill account number, LOA confirmation and type of identification provided. The event log data will be maintained for at least three years.
EGSs should at the time of accessing the website portal to request an account number, attest to the fact that they have and will retain an LOA from the customer. The website portal should be designed to allow for this attestation and should retain a record of it per the data retention expectations above.	PPL Electric's search will support the documentation of the form of identification and verification of the execution of a LOA from the customer. A "check box" will be presented to the EGS for attestation. Additionally, a "drop down box" will be presented for EGS selection of the form of customer identification provided. Search processing will not proceed unless the EGS confirms both the presence of a customer LOA and identifies the form of customer identification.

From: (610) 774-4254  
Paul E Russell  
PPL Corporation  
2 N 9th Street

Origin ID: ABEA



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Allentown, PA 18101

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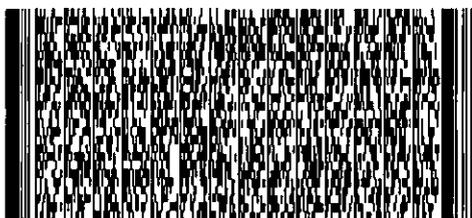
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