

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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February 18, 2014

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

RE: Petition of PECO Energy Company for Approval of
Its Default Service Program
(Customer Assistance Program Shopping Plan)
Docket No. P-2012-2283641

Dear Secretary Chiavetta:

Enclosed please find the Office of Consumer Advocate's Answer in Support of the Application of PECO Energy Company for a Stay and the Request for Stay of CAUSE-PA and TURN in the above-captioned proceeding.

Copies have been served upon all parties of record as shown on the attached Certificate of Service.

Sincerely,


Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824

Enclosures

cc: Hon. Cynthia Williams Fordham, ALJ
Office of Special Assistants (ra-OSA@pa.gov)
Certificate of Service

*169481

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PECO Energy Company :
For Approval of its Default Service Plan : Docket No. P-2012-2283641

ANSWER OF THE
OFFICE OF CONSUMER ADVOCATE IN SUPPORT OF
THE APPLICATION OF PECO ENERGY COMPANY
FOR A STAY AND THE
REQUEST FOR STAY OF
CAUSE-PA AND TURN

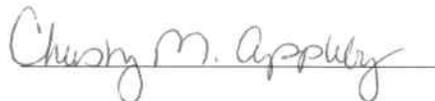
On February 10, 2014, PECO filed an Application for Stay of the Commission's January 24, 2014 Order (Application for Stay) and a Petition for Reconsideration and Clarification of the Commission's Order. Also on February 10, 2014, the Office of Consumer Advocate filed a Petition for Reconsideration and Clarification of the Commission's Order Entered January 24, 2014, and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and the Tenant Union Representative Network and Action Alliance of Senior Citizens of Greater Philadelphia (collectively TURN) filed a Joint Petition for Reconsideration and/or Clarification and for Stay (collectively here referred as CAUSE-PA/TURN). The OCA supports the request for stay of PECO and CAUSE-PA/TURN in this matter. The OCA submits that there is a significant potential for irreparable harm to consumers and customer confusion if the CAP Shopping Program goes into effect during the pendency of the Petitions

The OCA supports the proposed stay for the reasons set forth in PECO's Application for Stay and CAUSE-PA/TURN's request for a stay. The OCA submits that it will be difficult to move forward with a CAP Shopping Plan without resolving the issues identified in the PECO,

CAUSE-PA/TURN, and OCA Petitions for Reconsideration and Clarification. Implementation of a CAP Shopping Plan without resolution of the issues identified in the Petitions for Reconsideration and Clarification could lead to irreparable harm for CAP customers and non-participant residential ratepayers as well as customer confusion due to potentially inaccurate messages in consumer education materials.

WHEREFORE, the Office of Consumer Advocate supports PECO's Application for Stay and CAUSE-PA/TURN's request for a stay in its Petition for Reconsideration and Stay.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

Re: Petition of PECO Energy Company for Approval of Its Default Service Program
(Customer Assistance Program Shopping Plan)
Docket No. P-2012-2283641

I hereby certify that I have this day served a true copy of the foregoing document, the Office of Consumer Advocate's Answer in Support of the Application of PECO Energy Company for a Stay and the Request for Stay of CAUSE-PA and TURN, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 18th day of February 2014.

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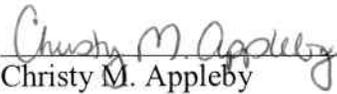
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