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February 18, 2014

**VIA eFiling & OVERNIGHT MAIL**

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

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

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Dear Secretary Chiavetta:

Enclosed for filing on behalf of **PECO Energy Company** is the original, notarized **Affidavit of Lauren B. Feldhake**, which was included as Exhibit A to both PECO's **Petition for Reconsideration and Clarification of the Commission's January 24, 2014 Order** (the "Petition") and PECO's related **Application for Stay**.

In addition, PECO is enclosing the executed **Verification of Richard G. Webster, Jr.**, which should be included with the Petition. Per the attached Certificate of Service, all parties will be served in the manner indicated. Should you have any questions, please contact me directly at 215.963.5384. Thank you.

Very truly yours,

  
Kenneth M. Kulak

KMK/tp

Enclosures

c: Per Certificate of Service

Almaty Beijing Boston Brussels Chicago Dallas Dubai\* Frankfurt Harrisburg Houston Irvine London Los Angeles Miami  
Moscow New York Palo Alto Paris Philadelphia Pittsburgh Princeton San Francisco Tokyo Washington Wilmington

\*In association with Mohammed Buhashem Advocates & Legal Consultants

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :  
FOR APPROVAL OF ITS DEFAULT : DOCKET NO. P-2012-2283641  
SERVICE PROGRAM (CUSTOMER :  
ASSISTANCE PROGRAM SHOPPING PLAN) :**

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served copies of the original, notarized **Affidavit of Lauren B. Feldhake**, which was included as Exhibit A to both PECO Energy Company's ("PECO's") **Petition for Reconsideration and Clarification of the Commission's January 24, 2014 Order** (the "Petition") and PECO's related **Application for Stay** and the executed **Verification of Richard G. Webster, Jr.**, which should be included with the Petition, on the following persons in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54.

**VIA ELECTRONIC MAIL AND OVERNIGHT MAIL**

Honorable Cynthia Williams Fordham  
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**VIA ELECTRONIC MAIL AND FIRST CLASS MAIL**

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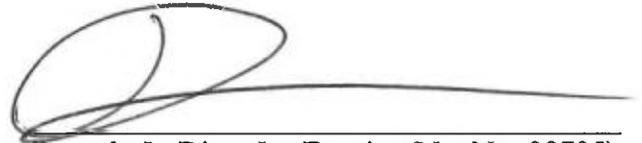
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*Counsel for PECO Energy Company*

Date: February 18, 2014

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :  
FOR APPROVAL OF ITS DEFAULT : DOCKET NO. P-2012-2283641  
SERVICE PROGRAM (CUSTOMER :  
ASSISTANCE PROGRAM SHOPPING :  
PLAN) :**

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**AFFIDAVIT OF LAUREN B. FELDHAKE**

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I, Lauren B. Feldhake, first being duly sworn for her affidavit in this matter, hereby state as follows:

1. I am over 18 years of age and am competent to submit this Affidavit.
2. I am employed by PECO Energy Company (“PECO” or “the Company”) as Director of Customer Financial Operations.
3. As Director of Customer Financial Operations, I am responsible for various departments including Billing, Payments Processing, and Credit & Collection. In addition, I have managerial oversight of PECO’s universal service programs designed for low-income, residential customers who express or demonstrate difficulty paying their energy bills, including PECO’s Customer Assistance Program (“CAP”).
4. In conjunction with my role as Director of Customer Financial Operations, I am overseeing implementation of customer education initiatives directed to low-income customers regarding the benefits of the competitive market and shopping for electricity.
5. Materials to educate low-income customers to participate in the competitive shopping market will require, at a minimum, the following components: (a) an individual mailing to each of approximately 140,000 CAP customers in PECO’s service territory to explain

their new ability to shop for retail electricity; and (b) new scripts and associated training for PECO's customer call center representatives to address the questions of CAP customers.

6. In light of the April 15, 2014 date for commencement of CAP shopping, individual mailings should be delivered to customers no later than March 15, 2014, so that customers will have sufficient time to understand the options and risks of contracting for competitive electric supply and be able to obtain assistance from PECO's call center.

7. Consistent with other customer mailings approved by the Commission and to avoid delays in call center response times, PECO plans to mail the CAP shopping customer educational materials in mailing groups of approximately 30,000 customers per day. Mailings to CAP customers would therefore need to start on March 10, 2014, in order to reach customers by March 15, 2014.

8. The Commission has directed that customer materials be reviewed by its Office of Communications, which usually requires up to two weeks for such reviews. In these circumstances, PECO believes materials will have to be submitted to the Commission for review no later than March 3, 2014 to provide sufficient time for consideration and additional revisions.

9. In order to have the collaborative before the educational materials are finalized, PECO will need to schedule the collaborative during February 25-27, 2014 time period. Given the complexity of the educational materials (as well as the fact that some parties may be preparing responses to PECO's Petition for Reconsideration in this proceeding at the same time as the collaborative), there is a substantial risk that the education outcome will be compromised by this accelerated process. The process may be further complicated as several stakeholders have also communicated to PECO that they believe the materials will need to address wholesale price market increases and the potential effects of variable rate charges which the Commission has recently highlighted for customers throughout the Commonwealth.

10. I have also consulted with the Company's information technology ("IT") organization regarding the software requirements to extend PECO's standard offer customer referral program ("Standard Offer Program") to CAP customers. The programming and process changes necessary to implement this functionality cannot be fully tested by April 15, 2014 and, if implemented without complete testing, there is a risk to the operation and customer experience process. PECO's 2014 IT programming schedule, which is linked to all PECO IT applications, includes six previously scheduled IT "pushes" where the Company will aggregate a variety of IT system changes and activate them in a coordinated fashion to ensure sufficient testing and system integration. The next two "pushes" after April 15, 2014, are scheduled for June 15, 2014 and August 15, 2014.

11. I verify that the statements made in this affidavit are true and correct. I understand that false statements herein are made subject to the penalties of 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities.

This 10th day of February, 2014.

  
\_\_\_\_\_  
Lauren B. Feldhake

COMMONWEALTH OF PENNSYLVANIA )  
 ) SS:  
COUNTY OF PHILADELPHIA )

Subscribed to and sworn before me this  
10<sup>th</sup> day of February, 2014.

  
\_\_\_\_\_  
Notary Public

My commission expires: 3/9/15

**LESLIE O'NEILL**  
**NOTARY PUBLIC OF NEW JERSEY**  
**My Commission Expires 3/9/2015**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PECO ENERGY COMPANY :  
FOR APPROVAL OF ITS DEFAULT : DOCKET NO. P-2012-2283641  
SERVICE PROGRAM (CUSTOMER :  
ASSISTANCE PROGRAM SHOPPING :  
PLAN) :**

**VERIFICATION**

I, Richard G. Webster, Jr., hereby declare that I am the Vice President of Regulatory Policy and Strategy, PECO Energy Company; that, as such, I am authorized to make this verification on its behalf; that the facts set forth in the foregoing Petition are true and correct to the best of my knowledge, information and belief; and that I make this verification subject to the penalties of 18 Pa.C.S. § 4904 pertaining to false statements to authorities.



\_\_\_\_\_  
Richard G. Webster, Jr.

Date: 2/10/14