

# PENNSYLVANIA ENERGY MARKETERS COALITION

March 8, 2014

Rosemary Chiavetta  
Secretary, Pennsylvania Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Dear Secretary Chiavetta:

Please find enclosed the Comments of the Pennsylvania Energy Marketers Coalition ("PEMC"), in response to the Pennsylvania Public Utility Commission's Order of February 6, 2014, regarding improvements to joint Electric Distribution Company – Electric Generation Supplier bill (Docket No. M-2014-2401345). Please do not hesitate to contact me with any questions or concerns regarding our Comments.

Sincerely,



Frank Caliva III  
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(PEMC)

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Enclosures

**COMMONWEALTH OF PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

**Investigation of Pennsylvania’s Retail            )**  
**Electricity Market: Joint Electric                )** **Docket No. M-2014-2401345**  
**Distribution Company – Electric                )**  
**Generation Supplier Bill                            )**

**COMMENTS OF THE  
PENNSYLVANIA ENERGY MARKETERS COALITION**

The Pennsylvania Energy Marketers Coalition (“PEMC”)<sup>1</sup> appreciates this opportunity to submit comments in response to the Pennsylvania Public Utility Commission (“PUC” or “Commission”) tentative order of February 6, 2014, which sought comments on three proposals from the Office of Competitive Market Oversight (“OCMO” or “Staff”) for making a more supplier-oriented utility consolidated electric bill. The PEMC appreciates the Commission’s and Staff’s efforts to strengthen the business relationship between electric generation suppliers (“EGSs” or “suppliers”) and their customers through improved communications and customer awareness of EGSs. As suppliers committed to customer service, product innovation, and the long-term success of the Pennsylvania energy market, we welcome this initiative.

Specifically, OCMO recommends three actions: (1) inclusion of the supplier logo on the electric distribution company (“EDC” or “utility”) bill; (2) the expansion of bill messaging space allotted to EGSs; and (3) the inclusion of a Shopping Information Box, which would provide a customer’s account number and rate schedule under which the customer receives service in order to facilitate the customer’s discussions with EGSs regarding switching.

**INCLUSION OF THE EGS LOGO**

The PEMC is strongly supportive of the proposal to include the EGS’s logo on the joint bill if the customer is enrolled with an EGS. The PEMC agrees with the Commission that the presence of an EGS logo on the EDC bill will both increase customer awareness and strengthen the relationship

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<sup>1</sup> For purposes of this filing, the PEMC consists of Agway Energy Services, LLC (“Agway”), Interstate Gas Supply Inc. d/b/a IGS Energy, and Pennsylvania Gas & Electric (“PAG&E”).

between the customer and their selected EGS. In terms of presentation, we would recommend that the EGS logo be in color if the EDC logo is in color on the customer bill.

### **INCLUSION OF EGS MESSAGING**

The PEMC is equally supportive of the proposal for expansion of bill messaging space for EGSs, specifically, doubling the amount of available space from two (2) to four (4) lines on each EDC's bill.

The PEMC respectfully suggests that EGSs be given the opportunity to use this bill messaging space to enhance communication and understanding between the customer and EGS. An example of messaging would be to educate customers about energy efficiency, conservation, and additional value-added products and services which could help them take control of their energy purchases.

### **SHOPPING INFORMATION BOX**

The PEMC supports the idea of a Shopping Information Box to facilitate customer discussions with EGSs about potential switching opportunities. In particular, in an age where customer data privacy concerns are top-of-mind for businesses and consumers alike, we believe the inclusion of a message that the account or customer number is necessary to effectuate a switch is critical to providing assurance to consumers that it is appropriate for an EGS to request this information as part of the enrollment process.

### **COST RECOVERY**

The PEMC fully recognizes that the proposed improvements come with costs for the EDCs. We believe the utilities are entitled to full cost recovery for prudently incurred and approved costs associated with these enhancements to customer bills. Given that the Commission has recognized the retail electricity market is of significant value to consumers, and further given that these proposals will benefit both existing customers of EGSs (through increased communication and awareness, and enhanced ability to shop with suppliers for energy products and services that best meet their needs and preferences) as well as shopping customers (through ease of access to information necessary for

switching), we respectfully propose that the EDCs recover costs from all customers in their next base rate proceeding.

### **ADDITIONAL PROPOSALS**

Finally, in light of the Commission's stated interest in EGSs providing more innovative products and services to customers in the Commonwealth, the PEMC proposes that suppliers be able to bill non-commodity charges on the joint bill.. We recognize that there are policy and technical issues attendant upon this proposal, so the PEMC further recommends a working group be established, made up of EDCs, EGSs, Staff, and other stakeholders, to develop a proposal for the Commission's consideration on how this could be implemented. As suppliers operating in multiple jurisdictions, we note that utilities in neighboring states (for example, Baltimore Gas & Electric in Maryland) now provide access for suppliers to use the joint bill for non-commodity charges, and thus any working group established could consider if these programs could be adapted for Pennsylvania.

**CONCLUSION**

The PEMC is greatly appreciative of the efforts of Staff in developing these proposed improvements to the joint EDC-EGS bill and of the leadership of the Commission in moving this proposal towards implementation. We believe our common interest in advancing the retail electricity market in the Commonwealth will be well-served by these changes, and we look forward to working with the Commission, Staff, EDCs, and other stakeholders to ensure successful implementation.

March 8, 2014

Respectfully submitted,

PENNSYLVANIA ENERGY MARKETERS COALITION



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CC: Michael Meath, President, SCLLC  
PEMC Distribution List (below)

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