

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of PPL Electric Utilities Corporation :  
For Approval of a Default Service Program : Docket No. P-2015-2526627  
And Procurement Plan for the Period :  
June 1, 2017 through May 31, 2021 :

SURREBUTTAL TESTIMONY

OF

BARBARA R. ALEXANDER

Consumer Affairs Consultant

ON BEHALF OF THE

OFFICE OF CONSUMER ADVOCATE

June 3, 2016

1 Q. PLEASE STATE YOUR NAME, ADDRESS AND OCCUPATION.

2 A. My name is Barbara R. Alexander. I use the title of Consumer Affairs Consultant. My  
3 address is 83 Wedgewood Dr., Winthrop, ME 04364. I appear in this case as a witness  
4 on behalf of the Office of Consumer Advocate (OCA).

5 Q. HAVE YOU PREVIOUSLY TESTIFIED IN THIS PROCEEDING?

6 A. Yes. I submitted Direct Testimony on behalf of the OCA on April 20, 2016.

7 Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?

8 A. I am submitting Surrebuttal Testimony in response to the Rebuttal Testimony of Mr.  
9 James Rouland on behalf of PPL Electric (PPL) filed on May 23, 2016 as PPL Statement  
10 No. 1-R and the Rebuttal Testimony of Mr. Matthew White on behalf of the Retail  
11 Electric Supply Association (RESA) filed on May 23, 2016 as RESA Statement No. 1-R.

12 **I. INTRODUCTION AND SUMMARY OF SURREBUTTAL TESTIMONY**

13  
14 Q. PLEASE PROVIDE A SUMMARY OF YOUR RESPONSE TO THE REBUTTAL  
15 TESTIMONY OF MR. ROULAND ON BEHALF OF PPL:

16 A. I have the following response to Mr. Rouland's Rebuttal Testimony:

17 • Mr. Rouland's Rebuttal rejects my recommendations for changes to the scripts  
18 and disclosures associated with the Standard Offer Program (SOP) because he alleges  
19 that (1) they are somehow in conflict with the settlement reached with the OCA and  
20 others in DSP III; and/or (2) they reflect the assumption that PPL has failed to properly  
21 implement the DSP III settlement or the SOP. Those assumptions are incorrect. My  
22 recommendations for change to the SOP reflect my ongoing review of the program,  
23 particularly the relationship between the SOP fixed price and the changes to the PTC over

1 time, as well as my review of the manner in which PPL has implemented the DSP III  
2 settlement terms.

3 • Mr. Rouland's statement that I have not documented any reason for my proposed  
4 recommendations for the additional disclosures or the changes in the current disclosures  
5 for the SOP is also incorrect. I documented in my Direct and will provide additional  
6 information at this time that clearly shows that customers who entered into the SOP  
7 during 2015 with a fixed price of 8.5 cents-8.8 cents per kWh experienced a total loss of  
8 the 7% "savings" opportunity starting in December 2015 when the PTC dropped to 7.8  
9 cents-7.9 cents per kWh and that loss of the discount has continued in early 2016. As a  
10 result, those customers who remained with the EGS are now paying more than the PTC  
11 for generation supply service. This alone justifies my recommended changes and reforms  
12 to the SOP disclosures.

13 • While Mr. Rouland also objects to my recommended disclosures because of the  
14 additional time and potential cost associated with changing the manner in which PPL's  
15 customer service representatives present this program, he offers no factual information or  
16 evidence to support his concern.

17 • Mr. Rouland's reaction to my recommendations fails to recognize that PPL has an  
18 obligation to provide full and complete disclosures for their own programs, the  
19 customers' rights under the Commission's customer service and consumer protection  
20 regulations, as well as the SOP. The current SOP disclosures are inadequate. It is unfair  
21 and unreasonable for PPL and its agent to refuse to provide accurate and full disclosures  
22 concerning the nature of the EGS terms and conditions prior to enrollment since PPL's  
23 presentation of this program is akin to the marketing of the terms by an EGS and does not

1 reflect the consumer protections associated with EGS disclosures and verification  
2 procedures that are applicable to an EGS directly.

3 • I disagree with Mr. Rouland’s approach to addressing the impact of higher prices  
4 and bills paid by CAP customers, either in the SOP or as a result of customer choice  
5 generally.

6 Q. PLEASE PROVIDE A SUMMARY OF YOUR RESPONSE TO THE REBUTTAL  
7 TESTIMONY OF MR. WHITE ON BEHALF OF RESA.

8 A. In response to Mr. White’s Rebuttal Testimony on behalf of RESA, I offer the following:

9 • Mr. White interprets my proposed additions and changes to PPL’s disclosures  
10 about the SOP as resulting in a reduced customer interest or enrollment in the SOP,  
11 stating that my proposals “would stifle EGS and customer participation in the SOP and  
12 otherwise limit the cost savings and customer choice education benefits that the SOP  
13 brings to customers.”<sup>1</sup> That reaction is disturbing because what Mr. White appears to  
14 argue is not that my recommended disclosures are incorrect, but that providing this  
15 additional information would result in a lesser degree of customer interest in the program.  
16 It is not reasonable or defensible to suggest that more accurate information should not be  
17 given because customers would somehow learn more and make a different decision.

18 • Mr. White’s support for continuing to emphasize the 7% discount as a “key  
19 component in engaging the customer about participation in the SOP program”<sup>2</sup> provides  
20 additional support for my concern in this regard and the need to temper this disclosure  
21 with the additional information I have recommended be provided to customers prior to

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<sup>1</sup> RESA Statement No. 1-R, at 4, lines 3-5.

<sup>2</sup> RESA Statement No. 1-R, at 7, lines 6-7.

1 enrolling with an EGS through the SOP. Whether the customer experiences a discount  
2 greater than 7%, a discount of less than 7%, or the elimination of the discount with a  
3 price that higher than the PTC supports my concern that relying on the “hook” of a  
4 specific 7% discount, no matter how it is attempted to be limited with the link to the  
5 “current PTC,” should be eliminated.

6 • With regard to Mr. White’s objection to my recommended language about the  
7 EGS’s renewal options at the end of the SOP agreement term, I would certainly agree to  
8 modify my recommended disclosure on this point to make it clear that the EGS will  
9 inform the customer about their renewal options as required by the Commission’s  
10 regulations, but I also continue to recommend that this disclosure inform customers that  
11 the EGS has the right to continue to serve the customer if the customer fails to respond to  
12 the renewal notices.

13 • Mr. White’s rejection of any reforms to ensure that CAP customers do not pay  
14 more than the PTC fails to recognize the adverse impacts on CAP customers and other  
15 ratepayers that flows from his support for rejecting the PTC as the proper metric to  
16 measure a reasonable price for these customers. Nor do I agree that proposals to respond  
17 to the concern of OCA and CAUSE in this regard would necessarily be “difficult to  
18 implement” or that systems would need to be changed.<sup>3</sup>

## 19 **II. RESPONSE TO THE REBUTTAL TESTIMONY OF MR. ROULAND ON** 20 **BEHALF OF PPL**

21 **Q. DO YOU RECOMMEND THAT THE SOP DISCLOSURES REMOVE ANY**  
22

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<sup>3</sup> RESA Statement No. 1-R, at 13.

1 MENTION OF DISCOUNTED RATES AS MR. ROULAND STATES<sup>4</sup>?

2 A. No. That is not my recommendation. Rather, I do recommend that the explicit “7%”  
3 reduction in price compared to the current PTC be eliminated. I have clearly stated in my  
4 Direct Testimony that the customer be informed that the EGS agreement is for 12 months  
5 at a fixed price that is “slightly less than the current default service or Price to Compare  
6 as stated on the customer’s bill.”<sup>5</sup> I continue to recommend that the reference to a “7%  
7 discount on the generation portion of the bill” that is used by the PPL customer service  
8 representatives is not the proper way to introduce this program to customers.

9 Q. IS MR. ROULAND CORRECT THAT “THE CURRENT SCRIPTS DO NOT  
10 PROMISE SAVINGS OF ANY KIND”<sup>6</sup>?

11 A. Yes, but that is not the entire story or my main point. Of course PPL is not “promising”  
12 savings, but PPL is presenting this program as a potential benefit and emphasizes the  
13 reduction in the generation supply portion of the bill to trigger a customer’s agreement to  
14 continue to discuss the program with PPL Solutions. The emphasis on the 7% reduction  
15 is not, in my opinion, a fair and equitable manner to present this program, particularly in  
16 light of the lack of any further explanation about the “shopping” nature of the proposed  
17 program by PPL’s customer service representatives. I continue to raise the concerns I  
18 identified in my Direct Testimony that the limitation on the constant reference to the “7%  
19 discount” that permeates this presentation is capable of being misunderstood or  
20 overlooked by customers, particularly when dealing with customers who may not fully  
21 understand that PPL’s PTC changes every six months or the variation in the PTC that has

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<sup>4</sup> PPL Statement No. 1-R, at 15, lines 17-18.

<sup>5</sup> OCA Statement No. 2, at 17, lines 3-4.

<sup>6</sup> PPL Statement No. 1-R, at 15, line 23.

1 and is likely to occur over time. The date that the PTC next changes is not part of PPL's  
2 disclosures. Nor are customers informed about the historical pattern of PTC price  
3 changes. Finally, PPL and EGSs will know the forthcoming PTC before this new price  
4 appears on the customer's bill and should reflect this information in the discussions with  
5 prospective customers.

6 Q. PLEASE UPDATE YOUR INFORMATION ON THE RELATIONSHIP BETWEEN  
7 THE 7% DISCOUNT AND THE CHANGES IN PPL'S PTC.

8 A. I include PPL's updated response to OCA-I-1, attachment 2 to this Rebuttal Testimony as  
9 Exhibit-BA-2. As clearly evident, customers who enrolled with an EGS through the SOP  
10 were given a fixed price of over 8 cents per kWh for agreeing to enroll with an EGS for a  
11 12-month contract throughout 2015, based on the PTC price of over 9 cents per kWh  
12 during that period. The SOP price gradually increased through 2015 in concert with the  
13 increasing PTC and was at 8.82849 cents per kWh for June through November 2015.  
14 However, in December 2015, the PTC dropped from 9.493 cents per kWh to 7.878 cents  
15 per kWh, a reduction of 17%. As a result, those who enrolled in 2015 prior to November  
16 2015 experienced a total loss of their 7% discount and paid 12% more than the PTC  
17 beginning in December 2015. This dramatic change from "potential savings" to "certain  
18 losses" was particularly adverse to customers who enrolled shortly before the PTC price  
19 drop in December 2015, none of whom were presumably informed for this forthcoming  
20 event. Those customers never experienced any "savings" at all.

21 Q. DOES MR. ROULAND RESPOND AT ALL TO YOUR CONCERNS ABOUT THE  
22 LACK OF THE TYPICAL CONSUMER PROTECTIONS AND VERIFICATION  
23 CALL POLICIES WHEN A CUSTOMER ENROLLS WITH AN EGS THROUGH THE

1 SOP AS DESCRIBED IN YOUR DIRECT TESTIMONY?

2 A. No. Mr. Rouland does not reference any of my concerns in this regard in his Rebuttal  
3 testimony. Rather, he repeats the refrain that the purpose of the SOP is to “encourage  
4 customers to try shopping by gaining shopping experience through the SOP.”<sup>7</sup> Yet, he  
5 rejects my specific recommendation that this program should in fact be presented to  
6 customers as a “shopping” experience or discussed as a program that offers the customer  
7 an opportunity to enroll with an EGS for a 12-month fixed price agreement.

8 A. DID MR. ROULAND PROVIDE ANY INFORMATION ON WHAT ADDITIONAL  
9 TALK TIME WOULD BE INCURRED BY ITS CUSTOMER SERVICE  
10 REPRESENTATIVES TO MAKE THE ADDITIONAL DISCLOSURES YOU  
11 RECOMMENDED?

12 A. No. Mr. Rouland’s claim of additional time and expense to provide the additional  
13 disclosures I have recommended should be tempered by some evidence of the current  
14 “talk time” associated with the current program based on actual analysis of customer  
15 calls. If representatives do engage in discussions of the program, as is likely the case, my  
16 recommended disclosures should be required as part of that conversation.

17 Q. DO YOU REMAIN CONCERNED ABOUT THE LACK OF TRAINING  
18 MATERIALS, BACKGROUND INFORMATION, AND Q AND A MATERIALS FOR  
19 THE SOP IMPLEMENTED BY PPL AND THAT YOU REFERENCED IN YOUR  
20 DIRECT TESTIMONY?

21 A. Yes. Mr. Rouland’s Rebuttal testimony fails to provide any facts or evidence based  
22 information about details concerning the SOP or instructions and training materials for

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<sup>7</sup> PPL Statement No. 1-R, at 16, lines 9-10.

1 either its customer service representatives or PPL Solutions that would assist these  
2 individuals in answering customer questions about this program and its interaction with  
3 future changes to the PTC.

4 Q. MR. ROULAND REJECTS YOUR PROPOSAL THAT PPL CONDUCT A SURVEY  
5 OR FOCUS GROUP OF SOP CUSTOMERS TO OBTAIN THE CUSTOMER'S  
6 UNDERSTANDING OF THE PROGRAM AND EXPERIENCE WITH THE INITIAL  
7 12-MONTH CONTRACT, AS WELL AS THE CONTRACT RENEWAL PROCESS.  
8 DO YOU AGREE WITH HIS REASONS?

9 A. No. Mr. Rouland states that my request is "incomplete" and that my proposal did not  
10 contain any "details," pointing to the lack of information about the design of the survey  
11 questions and the selection of the survey respondents.<sup>8</sup> Mr. Rouland's reasons are not  
12 sufficient to reject this proposal out of hand. His concerns are entirely appropriate and  
13 can be resolved in a collaborative manner should the survey or customer research I  
14 propose be agreed to be undertaken. It is not necessary to design the survey instrument  
15 and the survey process itself to discuss the potential for conducting customer research on  
16 how customers understand and have experienced this program.

17 Q. HAS MR. ROULAND CORRECTLY INTERPRETED YOUR RECOMMENDATION  
18 ABOUT THE SOP, CLAIMING THAT YOU HAVE SUGGESTED THAT THE  
19 COMMISSION "REPEAL" THE SOP<sup>9</sup>?

20 A. No. My testimony is that when approving this DSP that the Commission establish a  
21 "sunset" date for the SOP and require, prior to any assumed continuation for DSP V, that

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<sup>8</sup> PPL Statement No. 1-R, at 17.

<sup>9</sup> PPL Statement No. 1-R, at 18, line 1.

1 PPL or any other party be required to determine whether it should recommend this SOP  
2 or a different program or no program for the DSP that begins June 1, 2021. There is no  
3 basis for concluding that the Commission's prior orders concerning the SOP must be  
4 interpreted as approving this program in perpetuity.

5 Q. DO YOU AGREE WITH MR. ROULAND'S RESPONSE TO RESA'S TESTIMONY  
6 CONCERNING A CUSTOMER'S ABILITY TO "RE-ENROLL" IN THE SOP?

7 A. Yes. I agree that a customer that enrolls with an EGS for the 12-month agreement can,  
8 for whatever reason, call PPL and ask to enroll again in the SOP with the same or another  
9 EGS that is participating in the program. The feature of the SOP that eliminates any  
10 early termination fee for a customer's participation in the 12-month fixed price agreement  
11 naturally gives rise to the potential that some customers will seek to terminate their  
12 current EGS agreement and sign up for a new SOP agreement. Unfortunately, as I  
13 indicated in my Direct Testimony, PPL has not tracked the number of customers who  
14 have undertaken this step.

15 Q. DO YOU AGREE WITH MR. ROULAND'S RECOMMENDATION TO ADDRESS  
16 THE CUSTOMER ASSISTANCE PROGRAM (CAP) SHOPPING ISSUE?

17 A. No. Mr. Rouland continues to suggest that this issue should be resolved in a statewide  
18 collaborative. As a result, PPL does not take responsibility for addressing this issue in  
19 light of its specific CAP program design and the evidence that clearly documents the  
20 adverse impacts on CAP customers and other ratepayers when an EGS charges more than  
21 PPL's PTC. PPL and the stakeholders in this proceeding should address this issue.

22 Q. HAS MR. ROULAND PROPERLY INTERPRETED YOUR PROPOSAL FOR  
23 ADDRESSING THE CAP ISSUE?

1 A. No, he has not. I agree with Mr. Geller on behalf of CAUSE that the issue of how to  
 2 prevent undue adverse impacts on CAP customers and other ratepayers when CAP  
 3 customers pay higher prices to EGSs must be addressed in this proceeding. Similar to  
 4 Mr. Geller’s recommendation, I recommended that PPL and the stakeholders in this  
 5 proceeding consider changes to PPL’s CAP shopping program to address the adverse  
 6 impacts associated with PPL’s current shopping program and that are identified by Mr.  
 7 Geller in his Direct Testimony. As I stated in my Direct Testimony, “I do not agree with  
 8 the suggestion that this issue that reflects PPL’s OnTrack program design should  
 9 necessarily be resolved in the context of a statewide collaborative. Rather, I recommend  
 10 that steps be taken in this proceeding to establish reforms and the timetable for the  
 11 implementation of reforms prior to the implementation of DSP IV or June 1, 2017.”<sup>10</sup>

12 **III. RESPONSE TO THE REBUTTAL TESTIMONY OF MR. WHITE ON**  
 13 **BEHALF OF RESA**

14  
 15 Q. MR. WHITE ON BEHALF OF RESA REJECTS YOUR PROPOSALS FOR  
 16 ADDITIONAL AND MORE SPECIFIC DISCLOSURES FOR THE SOP. DO YOU  
 17 AGREE WITH HIS REASONING?

18 A. No. Mr. White argues that the additional disclosures I have recommended, none of  
 19 which he describes as inaccurate or misleading, should not be given because he fears that  
 20 additional disclosures and the elimination of the emphasis on the 7% discount might  
 21 result in fewer customers enrolling with an EGS in this program. He also claims that  
 22 additional disclosures might tire out customers on the telephone and that these disclosures

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<sup>10</sup> OCA Statement No. 2, at 21, lines 1-5.

1 would discourage customers from agreeing to enroll with the EGS. These are troubling  
2 reasons. First, Mr. White offers no support for his testimony about his interpretation of  
3 what customers value or how additional and accurate disclosures might not be welcomed  
4 by customers. Mr. White has not presented the basis that would justify his statements  
5 that my additional disclosures would amount to “information overload” or that customers  
6 would “ignore” this information. Second, Mr. White’s notion that more accurate  
7 information might result in a lower level of customer enrollment should be disregarded as  
8 self-serving and contrary to every consumer protection policy that I am familiar with over  
9 my 30 years of experience with these issues for both regulated and competitive retail  
10 markets. If more accurate disclosures have the result that some customers choose not to  
11 enroll, that is a desirable result because it reflects the customer’s informed choice. Any  
12 other result would suggest that it is appropriate to eliminate accurate and more detailed  
13 disclosures in order to stimulate customer enrollment based on inaccurate or less than  
14 complete disclosures. Finally, Mr. White’s reasoning does not reflect the obligations  
15 imposed on EGSs throughout the Commission’s consumer protection regulations  
16 concerning EGS marketing and sales conduct or the details associated with verification  
17 calls, none of which are applicable to this enrollment because it is done by PPL. I would  
18 be less troubled by the lack of this oversight and obligation for more detailed disclosures  
19 if the customer was being promised a discount throughout the entire 12-month term, but  
20 that is not the case here and the evidence I included in my Direct Testimony and in this  
21 Surrebuttal Testimony about the loss of the discount and the SOP contract price being  
22 higher than the PTC support my concern.

23 Q. IS IT YOUR INTENT TO LOWER THE CUSTOMER’S INTEREST OR

1 ENROLLMENT IN THE SOP WITH YOUR RECOMMENDATIONS?

2 A. No. However, I cannot support a program that has the potential to enroll customers in a  
3 program that appears to emphasize a 7% discount and that does not deliver that level of  
4 savings or any savings at all pursuant to the terms and conditions of the EGS agreement.  
5 The PPL customers who enrolled in the SOP in November 2015 did not experience and  
6 have not experienced any savings and have paid more than the PTC since their  
7 enrollment. That potential result suggests the need for significant changes to how this  
8 program is presented to customers prior to their agreement to hear more about the  
9 program and enroll.

10 Q. PLEASE COMMENT ON MR. WHITE'S OBJECTION TO YOUR RECOMMENDED  
11 DISCLOSURE ABOUT THE RENEWAL PROCESS.

12 A. Mr. White's Rebuttal Testimony on this point is correct in describing the Commission's  
13 regulations and the various EGS actions that might be taken at the end of the SOP term.  
14 My recommendation is that PPL and PPL Solutions provide the same information about  
15 the EGS's renewal options as provided in PPL's web based enrollment in the SOP and  
16 that I cited in my Direct Testimony.<sup>11</sup> I would presume that Mr. White agrees that those  
17 disclosures are accurate.

18 Q. WITH REGARD TO MR. WHITE'S REJECTION OF ANY REFORM TO ENSURE  
19 THAT CAP CUSTOMERS DO NOT PAY MORE THAN THE PTC WHEN  
20 SELECTING AN EGS, DO YOU HAVE A RESPONSE?

21 Q. Yes. Mr. White's opposition to any effort to prevent CAP customers from paying  
22 unaffordable electric bills or that would ameliorate the costs of the CAP imposed on other

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<sup>11</sup> OCA Statement No. 2, at 17, line 16.

1 residential ratepayers is unsound public policy. Nor does his approach reflect the  
2 obligation of PPL to design a “cost-effective” CAP program to “help low income  
3 customers to maintain electric service.”<sup>12</sup> At the current time, EGSs have a right to serve  
4 such customer without regard to any impact their prices might have on the customer’s  
5 ability to pay the bill because the risk of nonpayment is shifted to PPL and its other  
6 ratepayers, as well as the risk that a CAP customer is eliminated from the program or that  
7 a CAP customer’s family suffers a termination of service for nonpayment. However,  
8 both PPL and CAUSE have documented a serious problem that deserves a more  
9 immediate response by PPL and reforms to address this issue should be resolved prior to  
10 June 1, 2017.

11 Q. DO YOU AGREE WITH MR. WHITE’S REJECTION OF REFORMS CONCERNING  
12 CAP CUSTOMER ENROLLMENT WITH AN EGS ON THE GROUNDS THAT  
13 CHANGES TO THE CURRENT SYSTEMS WOULD BE DIFFICULT TO  
14 IMPLEMENT?

15 A. No. First, no specific reform has yet been developed in a sufficient manner to allow for  
16 any determination about the difficulty of its implementation or the impact of such a  
17 change on the EGS and PPL data exchange systems. Second, the system changes to  
18 benefit EGSs, such as the “seamless move,” “instant connect,” and a speeding up of the  
19 cancellation process, have been undertaken and the cost issues addressed. Finally, some  
20 reforms could be implemented more promptly than others, such as temporarily halting the  
21 CAP customer’s ability to enroll with an EGS by allowing PPL to reject such enrollment  
22 requests automatically. In any case, these are the issues that should be explored in the

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<sup>12</sup> See, 66 Pa. C.S. §§ 2803(definitions), 2804(9).

1 stakeholder process that both Mr. Geller and I have recommended.

2

3 Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY AT THIS TIME?

4 A. At this time, yes. Should additional information become available, I will seek to  
5 supplement this testimony as appropriate.

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EXHIBIT ACCOMPANYING

THE

SURREBUTTAL TESTIMONY

OF

BARBARA R. ALEXANDER

Consumer Affairs Consultant

ON BEHALF OF THE

OFFICE OF CONSUMER ADVOCATE

June 3, 2016

Exhibit BA-2

	# Residential Referrals	# Residential Enrollments	# EGSs Serving Residential	Residential Standard Offer Rate [¢/kWh]	Res PTC [¢/kWh]
Aug-13	10295	7898	3	7.65111	8.227
Sep-13	8261	7906	6	8.16261	8.777
Oct-13	10176	9321	6	8.16261	8.777
Nov-13	8645	8892	6	8.16261	8.777
Dec-13	7559	6328	11	8.14122	8.754
Jan-14	6591	6864	11	8.14122	8.754
Feb-14	6075	5577	11	8.14122	8.754
Mar-14	6864	6580	9	8.14122	8.754
Apr-14	6090	5752	9	8.14122	8.754
May-14	6931	6810	9	8.14122	8.754
Jun-14	6650	6515	5	8.40348	9.036
Jul-14	6657	6881	5	8.40348	9.036
Aug-14	6301	5923	5	8.40348	9.036
Sep-14	5840	4769	11	8.19702	8.814
Oct-14	4669	4479	10	8.32908	8.956
Nov-14	4944	5006	10	8.32908	8.956
Dec-14	5291	4325	9	8.66574	9.318
Jan-15	5154	6186	9	8.66574	9.318
Feb-15	4486	4595	9	8.66574	9.318
Mar-15	5342	5416	15	8.88987	9.559
Apr-15	5332	5283	15	8.88987	9.559
May-15	5576	4850	15	8.88987	9.559
Jun-15	7178	6272	12	8.82849	9.493
Jul-15	8187	7082	12	8.82849	9.493
Aug-15	6950	6499	12	8.82849	9.493
Sep-15	4533	3710	15	8.82849	9.493
Oct-15	4767	5311	15	8.82849	9.493
Nov-15	3795	5065	15	8.82849	9.493
Dec-15	5817	4597	12	7.32654	7.878
Jan-16	4505	4577	12	7.36374	7.918
Feb-16	4759	4333	12	7.36374	7.918
Mar-16	4353	4659	16	7.36374	7.918
Apr-16	3991	3764	16	7.36374	7.918

\*Dec 2013- Feb 2014: there are a total of 12 EGSs participating, 1 EGS is Residential only, 1 EGS is Small C only, the remaining 10 are both Residential and Small C.

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VERIFICATION

I, Barbara R. Alexander, hereby state that the facts above set forth in my Surrebuttal Testimony, OCA Statement No. 2-SR, are true and correct and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

DocuSigned by:  
  
8D0E58CA47E24C2

Signature:

Barbara R. Alexander

Consultant Address: 83 Wedgewood Dr.  
Winthrop, ME 04364

DATED: June 3, 2016