



An Exelon Company

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

December 8, 2017

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

Re: Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days in a Billing Period – Tariff Compliance Filing in Accordance with Docket No. P-2014-2446292 – Semi-annual Monitoring Report

Dear Secretary Chiavetta:

Pursuant to Commission Order at Docket No. P-2014-2446292, entered on December 8, 2016, PECO Energy Company ("PECO") is filing the following semi-annual report of its monitoring efforts and results of the Off-Cycle Switching bill program. Note, the Commission's December 8, 2016 Order modified the original requirement (See Order dated December 4, 2014) for filing Monitoring reports from quarterly to semi-annually.

PECO is also providing the results to the Commission's Bureau of Consumer Services, the Office of Competitive Market Oversight, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Retail Energy Supply Association. This report will be provided every six months through the end of the Commission approved temporary waiver period of December 31, 2018.

If you have any questions regarding this matter, please call Rich Schlesinger at 215-841-5771.

Sincerely,

cc: Alexis Bechtel, Bureau of Consumer Services
Dan Mumford, Office of Competitive Market Oversight
Richard Kanaskie, Director, Bureau of Investigation & Enforcement
Office of Consumer Advocate
Office of Small Business Advocate
Retail Energy Supply Association

attachment

OFF CYCLE SWITCHING – PUC REQUIRED REPORTING

Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days In a Billing Period – Docket P-2014-2446292	PUC Report Filing Date
<p><i>On December 4, 2014, in response to the Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days In a Billing Period, the PUC issued an order, Docket No. P-2014-2446292, directing PECO to provide a report of its monitoring efforts and results to the Commission’s Bureau of Consumer Services and Office of Competitive Market Oversight, the statutory advocates and RESA three months from the date this Order is entered, and every three months thereafter.</i></p> <p><i>On September 1, 2016, PECO filed a petition to extend the Temporary Waiver of Regulations Related to the Required Days in a Billing Period, Docket No. 2014-244629. The petition requested that the Commission grant an extension of the temporary waiver until such future date as the rulemaking in Docket No. L-2015-2508421 is finalized. Docket No. L-2015-2508421 is a Notice of Proposed Rulemaking to Amend Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C. S. Chapter 14. Included in this rulemaking is a proposed change to the definition of “billing month” that will render this waiver moot.</i></p> <p><i>On December 8, 2016, the PUC issued an order in response to PECO’s petition and granted the extension of the waiver until December 31, 2018. The PUC directed PECO to continue to monitor the results of the BOSS bill operations and report on its monitoring efforts and results to the Commission’s Bureau of Consumer Service, Office of Competitive Market Oversight, and Bureau of Investigation and Enforcement; Office of Consumer Advocate; Office of Small Business Advocate; and Retail Energy Supply Association every six months from the date of the order.</i></p>	<p>December 8, 2017</p>

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PA PUBLIC UTILITIES COMMISSION
SECRETARY'S OFFICE

Description of Reports

1. Total number of customers receiving BOSS bills and the subsequent short-period on-cycle bill for each month.
2. Average number of BOSS bills per-customer during a normal billing cycle.
Note: Only for the customers that switched
3. Number of customers receiving more than one BOSS bill during a normal billing cycle.
4. The highest number of BOSS bills provided to one customer during each month.

Report Data for December 17, 2014 to October 31, 2017

	#1	#2	#3	#4
	Accounts Receiving BOSS Bills	Average BOSS Bills Per Account	Accounts With >1 BOSS Bill	Highest Number BOSS Bills
Dec-14	7,491	1.04	305	3
Jan-15	21,928	1.08	1,588	5
Feb-15	20,185	1.09	1,611	5
Mar-15	18,351	1.07	1,140	4
Apr-15	18,479	1.06	1,102	4
May-15	17,383	1.07	1,153	4
Jun-15	17,226	1.06	989	5
Jul-15	19,463	1.06	1,113	4
Aug-15	18,552	1.06	1,085	5
Sep-15	22,415	1.06	1,321	4
Oct-15	23,481	1.08	1,648	6
Nov-15	23,400	1.09	1,986	5
Dec-15	21,592	1.07	1,451	4
Jan-16	20,796	1.07	1,365	5
Feb-16	18,920	1.06	1,103	6
Mar-16	20,571	1.07	1,324	5
Apr-16	18,080	1.08	1,194	6
May-16	19,011	1.08	1,302	6
Jun-16	20,847	1.08	1,394	5
Jul-16	21,993	1.08	1,520	7
Aug-16	21,412	1.07	1,363	5
Sep-16	22,840	1.08	1,686	7
Oct-16	20,537	1.09	1,547	7
Nov-16	28,625	1.06	1,570	6
Dec-16	22,988	1.09	1,836	7
Jan-17	22,033	1.09	1,757	7
Feb-17	18,811	1.09	1,491	7
Mar-17	19,579	1.09	1,524	5
Apr-17	20,886	1.10	1,821	7

	#1	#2	#3	#4
	Accounts Receiving BOSS Bills	Average BOSS Bills Per Account	Accounts With >1 BOSS Bill	Highest Number BOSS Bills
May-17	20,258	1.12	2,010	6
Jun-17	38,708	1.06	1,892	7
Jul-17	20,992	1.11	2,031	7
Aug-17	20,388	1.10	1,820	7
Sep-17	33,691	1.06	1,747	5
Oct-17	20,300	1.10	1,683	6

Description of Report

5. Number of late payments associated with a BOSS bill and the average number of days late during the reporting period and since implementation of BOSS billing.

Report Data for December 17, 2014 to October 31, 2017

	Number of Late Payments	Average Days Late
Dec-14	2,946	107
Jan-15	9,319	149
Feb-15	8,650	130
Mar-15	7,548	96
Apr-15	7,825	88
May-15	6,812	86
Jun-15	6,882	80
Jul-15	8,344	83
Aug-15	8,130	101
Sep-15	10,120	148
Oct-15	9,227	88
Nov-15	10,144	74
Dec-15	8,670	75
Jan-16	8,341	73
Feb-16	7,522	73
Mar-16	7,998	68
Apr-16	7,290	61
May-16	7,455	60
Jun-16	8,577	56
Jul-16	9,026	60
Aug-16	9,093	62
Sep-16	9,024	62

	Number of Late Payments	Average Days Late
Oct-16	7,929	63
Nov-16	10,270	57
Dec-16	9,179	57
Jan-17	8,819	53
Feb-17	7,466	51
Mar-17	8,013	46
Apr-17	8,125	45
May-17	7,701	41
Jun-17	12,232	32
Jul-17	8,845	34
Aug-17	8,669	28
Sep-17	11,112	20
Oct-17	7,336	9
Total	294,639	
Average		68

Note: The monthly decrease in the average number of days late does not represent a trend. Due to the timing of when data is collected, the bills in the later months have a limited number of days that could be counted as late.

Description of Report

6. Number of late payments associated with a short-period on-cycle bill and the average number of days late during reporting period and since implementation of BOSS billing.

Report Data for December 17, 2014 to October 31, 2017

	Number of Late Payments	Average Days Late
Dec-14	312	119
Jan-15	5,814	108
Feb-15	6,545	90
Mar-15	5,772	69
Apr-15	6,089	73
May-15	5,469	67
Jun-15	5,081	66
Jul-15	5,341	69
Aug-15	6,496	107
Sep-15	6,628	65
Oct-15	7,231	76
Nov-15	7,809	77
Dec-15	6,364	57

	Number of Late Payments	Average Days Late
Jan-16	5,487	59
Feb-16	5,676	56
Mar-16	6,063	57
Apr-16	5,791	53
May-16	5,587	53
Jun-16	5,658	50
Jul-16	6,451	51
Aug-16	6,587	50
Sep-16	6,741	52
Oct-16	6,211	54
Nov-16	6,509	55
Dec-16	8,091	48
Jan-17	5,413	48
Feb-17	5,832	48
Mar-17	5,776	45
Apr-17	5,820	41
May-17	5,796	39
Jun-17	6,856	32
Jul-17	7,529	31
Aug-17	6,319	27
Sep-17	8,171	19
Oct-17	5,578	9
Total	212,893	
Average		56

Note: The monthly decrease in the average number of days late does not represent a trend. Due to the timing of when data is collected, the bills in the later months have a limited number of days that could be counted as late.

Description of Report

7. Number of customer contacts related to PECO's BOSS billing during each month.

Report Data for December 17, 2014 to October 31, 2017

	BOSS Billing related customer calls into call center
Dec-14	107
Jan-15	1,265
Feb-15	1,293
Mar-15	1,135
Apr-15	954

	BOSS Billing related customer calls into call center
May-15	958
Jun-15	1,021
Jul-15	992
Aug-15	1,239
Sep-15	1,148
Oct-15	1,445
Nov-15	1,084
Dec-15	963
Jan-16	812
Feb-16	1041
Mar-16	1051
Apr-16	769
May-16	790
Jun-16	880
Jul-16	930
Aug-16	1143
Sep-16	1242
Oct-16	937
Nov-16	1056
Dec-16	1350
Jan-17	856
Feb-17	861
Mar-17	818
Apr-17	790
May-17	806
Jun-17	1524
Jul-17	1730
Aug-17	1147
Sep-17	2159
Oct-17	1089
Total	37,385

Description of Report

8. Total cost of providing BOSS bills and subsequent short-period on-cycle bills since implementation of BOSS billing.

Note: Only reporting incremental costs of Off Cycle Switching, excluding project costs.

Report Data for December 17, 2014 to October 31, 2017

	# Off Cycle E-Bills	Cost E-Bills	# Off Cycle Paper Bills	Cost Paper Bills	Total Cost
Dec-14	832	\$166	6,972	\$3,486	\$3,652
Jan-15	2,197	\$439	20,488	\$10,244	\$10,683
Feb-15	2,230	\$446	18,536	\$9,268	\$9,714
Mar-15	2,103	\$421	18,840	\$9,420	\$9,841
Apr-15	1,894	\$379	18,682	\$9,341	\$9,720
May-15	1,749	\$350	16,022	\$8,011	\$8,361
Jun-15	1,760	\$352	17,453	\$8,901	\$9,253
Jul-15	1,899	\$380	19,596	\$9,994	\$10,374
Aug-15	1,738	\$348	18,720	\$9,547	\$9,895
Sep-15	2,125	\$425	21,425	\$10,927	\$11,352
Oct-15	2,392	\$478	24,739	\$12,617	\$13,095
Nov-15	2,025	\$405	20,616	\$10,514	\$10,919
Dec-15	2,155	\$431	21,040	\$10,730	\$11,161
Jan-16	1,896	\$379	18,376	\$9,372	\$9,751
Feb-16	1,914	\$383	18,228	\$9,296	\$9,679
Mar-16	2,137	\$427	21,967	\$11,203	\$11,631
Apr-16	1,660	\$332	17,812	\$9,084	\$9,416
May-16	1,723	\$345	18,757	\$9,566	\$9,911
Jun-16	1,852	\$370	21,478	\$10,954	\$11,324
Jul-16	1,757	\$351	21,159	\$10,791	\$11,142
Aug-16	2,205	\$441	24,163	\$12,323	\$12,764
Sep-16	1,850	\$370	21,451	\$10,940	\$11,310
Oct-16	1,931	\$386	20,959	\$10,689	\$11,075
Nov-16	2,958	\$592	26,321	\$13,424	\$14,015
Dec-16	1,884	\$377	21,892	\$11,165	\$11,542
Jan-17	1,838	\$368	21,057	\$10,739	\$11,107
Feb-17	1,509	\$302	18,399	\$9,383	\$9,685
Mar-17	1,910	\$382	21,232	\$10,828	\$11,210
Apr-17	1,710	\$342	20,041	\$10,221	\$10,563
May-17	1,790	\$358	22,125	\$11,284	\$11,642
Jun-17	4,731	\$946	37,272	\$19,009	\$19,955
Jul-17	1,678	\$336	20,558	\$10,485	\$10,820

	# Off Cycle E-Bills	Cost E-Bills	# Off Cycle Paper Bills	Cost Paper Bills	Total Cost
Aug-17	1,876	\$375	22,659	\$11,556	\$11,931
Sep-17	3,954	\$791	31,822	\$16,229	\$17,020
Oct-17	1,999	\$400	22,005	\$11,223	\$11,622
Total	71,861	\$14,372	732,862	\$372,764	\$387,136

Note: The cost of an E-Bill is between \$0.00/bill for web bills and \$0.20/bill for CheckFree (\$0.20/bill is assumed in the above table). On May 31st 2015 the cost of paper bills increased to \$0.51 /bill from \$0.50/bill due to an increase in postage charges.

Description of Report

9. Efforts to investigate the potential for reflecting multiple switches on a single monthly bill and analysis of the results of such an investigation, including cost estimates.

Report Data for December 17, 2014 to October 31, 2017

- PECO held the first stakeholder webinar on June 29, 2015 to meet its commitment in the petition for temporary waiver – P-2014-2446292. The meeting was attended by 18 external parties which included representatives from OCA, PUC and 16 electric generation suppliers.
- PECO completed the business requirements that were deferred. The final work stream was placed into production on August 13, 2015. See report #10 for details.
- The revised estimate to reflect multiple switches on a single monthly bill has been calculated – Total Project cost is \$2.5M. PECO would prefer to continue the use of the BOSS Bill approach and will reevaluate the potential of a single monthly bill if and when Gas Accelerated Switching is ordered.
- PECO held the second stakeholder meeting/webinar on December 14, 2015. The meeting was attended by 24 external parties which included representatives from OCA, PUC and 13 electric generation suppliers.
- PECO held the third stakeholder meeting/webinar on June 29, 2016. The meeting was attended by 32 external parties which included representatives from OCA, PUC and 25 electric generation suppliers.
- Filed the Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days in a Billing Period, Docket No. P-2014-2446292 on September 1, 2016. This petition requested an extension of the waiver until such future date as the rulemaking in Docket No. L-2015-2508421 is finalized. Docket No. L-2015-2508421 is a Notice of Proposed Rulemaking to Amend Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C. S. Chapter 14. Included in this rulemaking is a proposed change to the definition of “billing month” that will render this waiver moot.
- In response to the petition, on December 8, 2016, the PUC extended the waiver until December 31, 2018. PECO is now required to provide a report every six months from the date of the latest order with stakeholders meetings following 30 days after the release of each BOSS bill report.
- PECO held the fifth stakeholder meeting/webinar on June 30, 2017. The meeting was attended by 30 external parties which included representatives from OCA, PUC and 13 electric generation suppliers.
- We are preparing the webinar for our next Stakeholder meeting which is scheduled for December 12, 2017.

Description of Report

10. Any changes made to improve the implementation of BOSS billing over the prior three months.

Report Data for February 1, 2015 to October 31, 2017

- Changes implemented on February 12, 2015, April 17, 2015, June 11, 2015 and August 13, 2015 to enhance the BOSS bill implementation and address scope that was deferred in order to meet the December 2014 deadline. Scope includes:
 - ✓ Bill message enhancements
 - ✓ The ability to prevent all inserts on BOSS Bills
 - ✓ Historical Interval Usage / Historical Usage (HI/HU) improvements
 - ✓ Net Metering enhancements
 - ✓ Changes to ensure that PECO Smart A/C Saver (a PECO Smart Ideas program that helps customers use less energy and save money) credits appear on on-cycle bill only
 - ✓ Suspended charges enhancements
 - ✓ Modifications to several windows and archival size limits in the Customer Information System (CIS) to accommodate the potential for the increased frequency of bills due to BOSS billing.
 - ✓ New BOSS reports
 - ✓ New contact type added to the Customer Service Window (CSW) in the Customer Information System (CIS) to identify a BOSS billing call.
 - ✓ Adjustment to annual ICAP extraction to include multiple BOSS bills in the same bill period
- Addressed minor issues found during post implementation.

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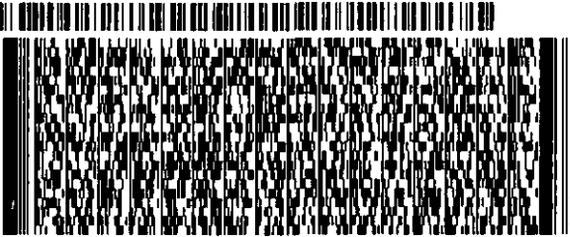
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BILL SENDER

TO ROSEMARY CHIAVETTA
PENNSYLVANIA PUBLIC UTILITY COMMISS
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HARRISBURG PA 17120

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