



An Exelon Company

Richard G. Webster, Jr.
Vice President
Regulatory Policy & Strategy

Telephone 215.841.5777
Fax 215.841.6208
www.peco.com
dick.webster@peco-energy.com

PECO
2301 Market Street
S15
Philadelphia, PA 19103

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

December 10, 2018

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, 2019.

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

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 Retail Energy Supply Association three months from the date this Order is entered, and every three months thereafter.

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.

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 Services, the Office of Competitive Market Oversight, the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Retail Energy Supply Association every six months from the date of the order.

On September 7, 2018, 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 either December 31, 2020 or such earlier date as the rulemaking in Docket No. L-2015-2508421 is finalized.

On December 6, 2018, the PUC issued an order in response to PECO's petition and granted the extension of the waiver for an additional one year, through December 31, 2019. The one year was based on the final rulemaking for Docket No. L-2015-250842 expected to be complete by April 19, 2019. If the proposed rulemaking for Docket No. L-2015-250842 is completed as written prior to December 31, 2019, then the waiver will be moot as of the effective date of the regulation. If, however, the regulation is not complete as of April 19, 2019, PECO will have ample time to seek an additional extension. 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 Services, the Office of Competitive Market Oversight, the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Retail Energy Supply Association every six months from the date of the order through the end of the waiver period.

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PA PUBLIC UTILITY COMMISSION
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December 8, 2018

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, 2018

	#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
May-17	20,258	1.12	2,010	6

	#1	#2	#3	#4
	Accounts Receiving BOSS Bills	Average BOSS Bills Per Account	Accounts With >1 BOSS Bill	Highest Number BOSS Bills
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
Nov-17	22,862	1.10	1,980	7
Dec-17	26,321	1.13	2,966	6
Jan-18	25,872	1.11	2,421	9
Feb-18	21,991	1.10	1,964	6
Mar-18	20,762	1.10	1,781	6
Apr-18	21,130	1.12	2,036	6
May-18	20,600	1.12	2,048	7
Jun-18	21,092	1.12	2,113	9
Jul-18	26,416	1.11	2,412	7
Aug-18	23,009	1.10	2,113	7
Sep-18	37,626	1.07	2,278	6
Oct-18	20,939	1.12	2,228	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, 2018

	Number Late Payments	Average Days Late
Dec-14	2,927	129
Jan-15	9,277	190
Feb-15	8,622	165
Mar-15	7,555	115
Apr-15	7,771	103
May-15	6,827	101
Jun-15	6,876	98
Jul-15	8,342	102
Aug-15	8,121	129
Sep-15	10,067	201
Oct-15	9,202	109
Nov-15	10,153	89
Dec-15	8,597	94
Jan-16	8,322	94
Feb-16	7,498	95
Mar-16	8,004	88
Apr-16	7,275	74
May-16	7,440	76
Jun-16	8,532	71
Jul-16	9,010	79
Aug-16	9,061	82
Sep-16	9,005	85
Oct-16	7,954	84
Nov-16	10,271	78
Dec-16	9,143	82
Jan-17	8,746	78
Feb-17	7,413	79
Mar-17	7,945	75
Apr-17	8,075	74
May-17	7,668	71
Jun-17	12,155	62

	Number Late Payments	Average Days Late
Jul-17	8,810	70
Aug-17	8,639	67
Sep-17	11,049	62
Oct-17	7,931	63
Nov-17	8,615	63
Dec-17	10,642	71
Jan-18	10,726	58
Feb-18	9,051	55
Mar-18	8,166	50
Apr-18	8,265	50
May-18	8,016	43
Jun-18	8,395	40
Jul-18	10,308	38
Aug-18	9,890	32
Sep-18	18,702	17
Oct-18	8,813	18
Total	413,872	
Average		79

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, 2018

	Number Late Payments	Average Days Late
Dec-14	307	141
Jan-15	5,792	131
Feb-15	6,508	107
Mar-15	5,760	73
Apr-15	6,065	79
May-15	5,451	72
Jun-15	5,091	74
Jul-15	5,330	79
Aug-15	6,487	135
Sep-15	6,594	71
Oct-15	7,212	87
Nov-15	7,795	90
Dec-15	6,338	63
Jan-16	5,468	67
Feb-16	5,665	63
Mar-16	6,054	64
Apr-16	5,795	58
May-16	5,574	61
Jun-16	5,647	58
Jul-16	6,432	60
Aug-16	6,567	56
Sep-16	6,719	60
Oct-16	6,224	62
Nov-16	6,517	63
Dec-16	8,085	58
Jan-17	5,379	59
Feb-17	5,792	65
Mar-17	5,735	65
Apr-17	5,798	54
May-17	5,748	56
Jun-17	6,804	50
Jul-17	7,471	53

Aug-17	6,278	50
Sep-17	8,136	48
Oct-17	5,841	54
Nov-17	6,279	55
Dec-17	6,903	50
Jan-18	6,771	47
Feb-18	6,893	45
Mar-18	5,952	43
Apr-18	5,561	42
May-18	6,641	38
Jun-18	5,632	36
Jul-18	6,386	33
Aug-18	7,498	28
Sep-18	9,465	19
Oct-18	7,494	9
Total	293,934	
Average		60

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, 2018

	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
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

	BOSS Billing related customer calls into call center
Sep-17	2159
Oct-17	1089
Nov-17	877
Dec-17	826
Jan-18	947
Feb-18	1023
Mar-18	817
Apr-18	870
May-18	1051
Jun-18	771
Jul-18	1034
Aug-18	1644
Sep-18	1113
Oct-18	1017
Total	49,375

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, 2018

	# 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
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
Nov-17	1,960	\$392	21,985	\$11,212	\$11,604
Dec-17	1,949	\$390	25,052	\$12,777	\$13,166
Jan-18	2,258	\$452	26,403	\$13,466	\$13,917
Feb-18	1,745	\$349	21,614	\$11,023	\$11,372
Mar-18	1,805	\$361	21,971	\$11,205	\$11,566
Apr-18	1,690	\$338	21,884	\$11,161	\$11,499
May-18	1,655	\$331	22,445	\$11,447	\$11,778
Jun-18	1,659	\$332	22,130	\$11,286	\$11,618
Jul-18	2,227	\$445	26,836	\$13,686	\$14,132
Aug-18	1,986	\$397	26,315	\$13,421	\$13,818
Sep-18	2,065	\$413	35,702	\$18,208	\$18,621
Oct-18	1,645	\$329	24,005	\$12,243	\$12,572
Total	94,505	\$18,901	1,029,204	\$523,899	\$542,800

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, 2018

- 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 meeting following 30 days after the release of each BOSS bill report.
- PECO held the sixth stakeholder meeting/webinar on June 18, 2018. The meeting was attended by 14 external parties which included representatives from PUC and 11 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 7, 2018. This petition requested an extension of the waiver until such future date as the rulemaking in Docket No. L-2015-2508421 is finalized.
- In response to the waiver petition, on December 6, 2018, the PUC extended the waiver until December 31, 2019. PECO is required to provide a report every six months from the date of the latest order and hold stakeholders meetings as necessary to communicate material changes to the BOSS Bill program that affect customers and electric generation suppliers.

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, 2018

- 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.

