



AN EXELON COMPANY

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March 24, 2022

Via E-Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Second Floor
Harrisburg, PA 17120

RE: Petition of PECO Energy Company to Auto-Enroll Residential Customers in
Outage Notifications
Docket No. P-2022-_____

Dear Secretary Chiavetta:

Enclosed for filing please find the **Petition of PECO Energy Company to Auto-Enroll Residential Customers in Outage Notifications**.

Should you have any questions, please do not hesitate to contact me.

Respectfully submitted,

Jennedy S. Johnson

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of PECO Energy Company to :
Auto-Enroll Residential Customers in : **Docket No. P-2022-_____**
Outage Notifications :

**PETITION OF PECO ENERGY COMPANY TO AUTO-ENROLL
RESIDENTIAL CUSTOMERS IN OUTAGE NOTIFICATIONS**

Pursuant to 52 Pa. Code Section 5.41, PECO Energy Company (“PECO” or the Company) hereby files this petition and respectfully requests that the Pennsylvania Public Utility Commission (“Commission”) grant it authority to auto-enroll its residential customers in outage notifications for emergent and planned service outages. PECO respectfully requests that the Commission afford this petition expedited consideration, by the August 4, 2022 Public Meeting, if possible. In support of this Petition, PECO states as follows:

1. PECO is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office in Philadelphia, Pennsylvania. PECO provides electric delivery service to approximately 1.6 million customers and natural gas delivery service to more than 511,000 customers in Pennsylvania.

2. Public Utility Code Section 69.1902 provides guidance regarding utility service outage response recovery and public notification guidelines and provides, *inter alia*, that both automated dialer systems and “electronic mail and other emerging technology” are acceptable methods of public outage notifications. 52 Pa. Code § 69.1902(a).¹

¹ See also, *Policy Statement Regarding Utility Service Outage Public Notification Guidelines*, Docket No. M-2008-2065532 (Final Policy Statement entered December 15, 2011) (hereinafter “2011 Outage Policy Statement”).

3. PECO's outage notification program includes both planned and emergency outages. Customers can enroll in the program through PECO.com or the PECO mobile app. The Company promotes customer awareness of this program through on-hold messaging, customer newsletters, email marketing campaigns, and bill inserts. PECO experiences the greatest spikes in outage notification enrollments during the months with large storms.

4. Currently, for planned outages, PECO provides notification to residential customers by mailed letters, email, text message notification, recorded phone message, or door hanger notice depending upon the customers' enrollment in our outage notification program. Residential customers enrolled in notifications receive planned outage scheduling, reminders, rescheduling, and cancellation information via their preferred method – text message, email, and/or recorded phone call. Those not enrolled receive letters, recorded phone messages, and/or door hanger notices.

5. For emergency outages, PECO currently provides notification to residential customers if they have selected to receive outage alerts through PECO.com or the PECO mobile app.² For emergency outages, PECO currently sends voice, text, or email outage notifications to customers that have already enrolled in outage notifications. Outage information is also available to all residential customers via PECO.com, the mobile app, or by calling into the Care Center.

6. Approximately 41% (or 605,000 of the Company's 1.465 million residential customers) are currently enrolled in outage notifications.

² Customers can also enroll in outage notifications by texting 'ADDOUTAGE' to MYPECO (697326).

7. Through the instant Petition, the Company is seeking Commission approval to auto-enroll residential customers in outage notification alerts (for both planned and emergency outages), as follows:

- i. Mobile Number (Text Alert): customers who have provided PECO with mobile number and *who have not previously opted out of SMS/text messages* would be auto-enrolled in SMS/text outage alerts
- ii. Landline (Voice Alert): customers who have only provided PECO with a landline number and *who have not previously opted out of voice calls* would be auto-enrolled in voice call outage alerts

In both instances, the first notification (i.e., text or voice alert) that a customer would receive is an outage update the next time the customer experiences an emergent outage or is scheduled for a planned outage.³

8. In order to ensure compliance with the Telephone Consumer Protection Act (“TCPA”), customers on the “do not call” list, as well as those who have previously opted out of SMS/text messaging or voice calls, would be excluded from auto-enrollment in outage notifications. Customers will also be provided with opt out messaging with each alert:

- i. Text: *Text PAUSE for 72hrs or STOP to stop all texts.*
- ii. Voice Alert: *If we reached this number in error, please press 7. If you no longer want to receive autodialed calls from PECO on this phone number, please press 9.*

9. PECO submits that auto enrollment in outage notifications would provide tangible customer benefits in emergency situations, including:

- providing customers with awareness of a service interruption if they are not at home to detect it;
- eliminating the need for customers to contact PECO to report an outage (as PECO would proactively send the outage alert upon detecting a power failure at the customer’s meter); and

³ PECO expects to complete auto-enrollment of residential customers within 180 days of a Commission Order approving this process.

- delivering 1) estimated restoration time update alerts and 2) final restoration messaging that explains the reason for the outage.

PECO anticipates that these outage (and restoration) notifications will also reduce the volume of customers calling PECO for outage status, thereby freeing Call Center agents to handle more emergent calls and reducing wait times.

10. Similarly, planned outage notifications would provide a much more informed customer experience as compared to the traditional paper letter process.⁴ Reminder alerts would help customers prepare for power interruptions as the scheduled time draws near and serve as a reminder of the upcoming outage. Further, updates to scheduled work can be communicated in a more timely manner by eliminating the lag time associated with mailings.

11. PECO notes that the Commission itself, in its 2011 Outage Policy Statement, encouraged the use of modern technologies to communicate outages to customers, specifically noting, “[w]e also believe that modern technology is being under-utilized by the utilities. Automated dialing systems, social media, electronic mail, or text messaging could prove to be effective communication tools for customers. For example, customers could opt to provide cellular telephone or home telephone numbers for notification of outage updates.” *Policy Statement Regarding Utility Service Outage Public Notification Guidelines*, Docket No. M-2008-2065532, p. 6 (Final Policy Statement entered December 15, 2011) (“2011 Outage Policy Statement”).

12. In that same Order, the Commission noted, “that the success of the use of modern technologies such as social media, electronic mail, and text messaging is somewhat dependent upon the consumers’ willingness to provide that secondary-contact information. However, we

⁴ These will be additional notifications and supplement existing paper, electronic, and social media notifications.

believe sufficient customer interest in receiving timely information during an outage exists, leading to willingness by those customers to voluntarily provide secondary-contact information such as e-mail and text-messaging addresses to the utilities.” *Id.*

13. Since the 2011 Outage Policy Statement there has been a general increase in usage of “modern technologies” for communication, but such increase has not resulted in customers “opting in” to outage notifications. In a recent study conducted by PECO’s sister utility Baltimore Gas and Electric Company (“BGE”), customers enrolled in outage notifications were approximately 25% more satisfied that the utility was keeping them informed during outages than those who were not (i.e., 85% for enrolled and 60% for non-enrolled customers). The same survey indicated that approximately 80% of enrolled customers reported a “low” level of effort required by them during utility outages; in contrast, only 53% of customers that were *not* enrolled in outage alert notifications reported a “low” level of effort required during utility outages. Of note, the same survey indicated that 95% of those customers not currently enrolled do want to receive outage notification alerts but have not enrolled due to a lack of awareness of the alerts program or understanding of how to enroll. As a result of this direct customer input, in Spring 2022, BGE will be implementing an auto-enrollment outage notification program identical to the one being proposed in this filing.

14. PECO has been authorized to represent that Office of Consumer Advocate does not oppose this Petition.

CONCLUSION

Based upon the foregoing, PECO respectfully requests that the Commission grant this Petition by its August 4, 2022 Public Meeting and approve the auto-enrollment of residential customers in outage notifications.

Respectfully submitted,



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Dated: March 24, 2022

VERIFICATION

I, Richard G. Webster, Jr., hereby declare that I am the Vice President of Regulatory Policy and Strategy for 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.



Dated: March 24, 2022

Richard G. Webster, Jr.

