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PECO Energy Company
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May 12, 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-2022-3031585

Dear Secretary Chiavetta:

Enclosed for filing please find the **Responses of PECO Energy Company to Data Requests of the Public Utility Commission.**

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

Respectfully submitted,

Jennedy S. Johnson

Enclosure

Cc: Joseph P. Cardinale, Jr (jcardinale@pa.gov)

Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission

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Responses of PECO Energy Company
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Public Utility Commission

May 12, 2022

PUC-I-1:

Does PECO require residential gas and electric customers to provide a cell phone number and/or an email address?

Response:

Customers are required to provide a phone number – which can be either a land line or a cell phone – upon starting service. If the customer starts service by calling PECO, the customer is not required to provide an email address. If the customer starts service online via peco.com, then an email address is required.

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PUC-I-2:

PECO notes in Paragraph 7 of the Petition that customers “who have not previously opted out of SMS/text messages” and “who have not previously opted out of voice calls” will be auto-enrolled in outage notification alerts. Does PECO require residential gas and electric customers to initially “opt in” to receiving communication through the methods the residential gas and electric customer provides when they enrolled in PECO’s service?

Response:

No, PECO does not require residential gas and electric customers to initially “opt in” to receiving communications through the methods the residential gas and electric customer provides when they enrolled in PECO’s service. The reference in Paragraph 7 is to those customers who had previously self-enrolled in notifications via the Preference Center on peco.com or through the Company’s telephonic IVR system, but subsequently texted ‘STOP’ or pressed ‘9’ to opt-out of future notifications.

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PUC-I-3:

Does PECO notify residential gas and electric customers providing their cell phone number and/or email address that PECO will use these methods for communication?

Response:

Currently, call center agents do not specifically address the intended uses of customer phone numbers or emails on start service calls. PECO is developing scripting for start service calls to enroll customers in outage notifications. This scripting will be reviewed with all call center agents during PECO's fall training session and will go live in Q42022.

Customers providing phone numbers and/or emails when starting service online agree to the terms and conditions, which (among other things) explain that PECO will use the contact information to communicate regarding matters "closely related" to the customer's account.

"When you voluntarily provide us with a cell phone number on our Site, you are giving us express written consent to use that number for the purpose indicated, or if given with regard to your utility account or other account with us, express written consent to communicate information to you that is closely related to such account, so long as you have not given us instructions to the contrary. You may revoke this consent at any time by any reasonable method. Your consent to be contacted by us is not required in order to receive our Services."

<https://www.exeloncorp.com/privacy-policy> (emphasis added); available on PECO.com by selecting "Privacy" at the bottom of any page.

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PUC-I-4:

If a residential gas and electric customer provides PECO with a cell phone number, does the residential gas and electric customer agree to receive SMS/text messages? Is there express language on PECO's forms or agreements that providing a cell phone number operates as an agreement to accept SMS/text messages from PECO?

Response:

No. With the limited exception of the communication language contained in the terms and conditions at online enrollment (described in the Company's response to PUC-I-3), if a residential customer provides PECO with a cell phone number, that customer does not by that action alone agree to receive SMS/text messages, nor is there express language on PECO's forms or agreements that providing a cell phone number operates as an agreement to accept SMS/text messages from PECO.

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PUC-I-5:

Is PECO seeking to apply auto-enrollment to both residential gas and electric customers if the Commission approves PECO's petition for auto-enrollment?

Response:

Yes, PECO is seeking to auto-enroll both residential gas and electric customers in outage notifications. The Company does not currently have any gas-related outage alerts, and gas-only customers would not receive electric outage alerts.

VERIFICATION

I, Lauren B. Feldhake, Vice President of Customer Operations for PECO Energy Company, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, 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).



Lauren B. Feldhake

Dated: May 12, 2022