



Direct Dial: 267.533.2126
adesola.adegbesan@exeloncorp.com

May 15, 2024

VIA E-FILING

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

**RE: Guidelines for Eligible Customer Lists
Docket No. M-2010-2183412**

Dear Ms. Chiavetta:

Enclosed for filing with the Commission are the *Comments of PECO Energy Company to the March 1, 2024 Secretarial Letter regarding the Guidelines governing the Eligible Customer List*.

Please feel free to contact me with any questions. Thank you for your time and attention on this matter.

Very truly yours,

A handwritten signature in black ink that reads "Adesola K. Adegbesan". The signature is written in a cursive style and is positioned above a horizontal line.

Adesola K. Adegbesan
Assistant General Counsel, PECO Energy Company

Enclosure

CC: Daniel Mumford (dmumford@pa.gov)
Kriss Brown (kriborwn@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**GUDIELINES FOR ELIGIBLE CUSTOMER
LISTS** : : **Docket No. M-2010-2183412**
: :
:

**Comments of PECO Energy Company to the March 1, 2024 Secretarial Letter
regarding the Guidelines governing the Eligible Customer List**

I. INTRODUCTION

On March 1, 2024, the Pennsylvania Public Utility Commission (the “Commission” or “PUC”) issued a Secretarial Letter in the above-captioned docket inviting all interested parties to provide written comments on the guidelines governing the Eligible Customer List (“ECL”). This list contains information about customers of Electric Distribution Companies (“EDCs”) and Natural Gas Distribution Companies (“NGDCs”) who are eligible for consideration by Electric Generation Suppliers (“EGS”) and Natural Gas Suppliers (“NGS”) for potential services. Specifically, the Commission is requesting feedback on the use of electronic methods in communicating with customers, as an alternative to traditional written notices sent via the U.S. Postal Service. Customers who do not respond (i.e., “opt-out”) are automatically included in the ECL. PECO appreciates the opportunity to provide comments on this matter.

Overall, PECO is committed to continually exploring innovative methods to engage with customers through electronic communications, as well as utilizing electronic channels for customer responses according to their preferences. PECO is also committed to educating customers on how the information presented in the ECL is used by EGSs and NGSs, and keeping

customers aware of their options as it relates to their Release of Information (“ROI”) to EGSs and NGSs.

II. BACKGROUND

The Commission implemented the ECL through an Order entered November 12, 2010, at Docket No. M-2010-2183412, outlining interim guidelines for EDCs’ provision of ECLs. On November 10, 2011, the Commission entered a Final Order on Reconsideration updating the interim ECL guidelines. Following subsequent processes, including informal and formal comment periods, the Commission adopted final ECL guidelines through the ECL *Order* on October 23, 2014. The Commission also directed EDCs to conduct a triennial company-wide solicitation every three years, beginning in the first quarter of 2015, to update their ECLs.

III. COMMENTS

In accordance with the Commission’s directive regarding solicitations, PECO revised its ECL process to comply with the Final Order and solicit its entire customer base in February 2015, except for large customers who are part of the Philadelphia Area Industrial Energy Users Group (PAIEUG), since the requirement for a triennial solicitation applies only to residential and small commercial customers. PECO has since maintained the triennial company-wide solicitation practice.

Currently, PECO will send an initial communication informing customers that their ROI preference will be reset to “Release All” meaning that all customer information may be released; customers receive this communication via a bill insert with a tear-off form, which they will complete as applicable and return with their PECO bill payment. In addition to receiving a bill insert, customers receive a pop-up message through their PECO MyAccount upon successful login. A banner is also visible in the PECO Mobile Application, and customers also receive notice

of the ELC reset when they call the Customer Care phone number and follow the Interactive Voice Response (“IVR”) voice prompts to select their ROI preference. All other marketing and factual email communications that are intended for mass communication are sent from a “No-Reply” sender. PECO currently does not have a “Reply” functionality.

PECO acknowledges that there are costs and environmental benefits regarding the use of electronic communications, as opposed to written letters or non-electronic means of transmission. Customers are increasingly expecting the use of electronic communications as technology continues to advance and becomes more integrated into their daily lives. Such communications offer convenience, speed, and accessibility to customers who have the capabilities to communicate electronically and prefer to do so. Due to these factors, PECO supports electronic communication with customers and electronic billing methods.

However, PECO also acknowledges that expanding email ECL service, and moving away from traditional written notices, poses continuous technological and logistical hurdles. Despite having introduced a few electronic communication methods for the ECL solicitation, PECO faces the challenge that not all customers are obliged to provide their email addresses when applying for electric or gas services, and furthermore, not all customers have email addresses. Consequently, PECO must continue sending written communication to both customers who have provided their email addresses and those who have opted out of electronic communications, even if they have provided their email addresses. PECO must also consider the needs of all customers, including low-income customers, and ensure that they receive important updates and information in a format that is accessible and convenient for them. This may involve continuing to offer communication channels that are not electronic to accommodate customers without access to technology. PECO

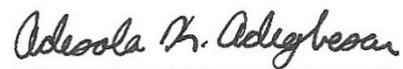
will continue to meet the needs of all customers by prioritizing inclusivity and accessibility in its communication strategy.

Lastly, PECO acknowledges that other EDCs may file comments supporting elimination of the ECL due to various factors, such as cost, usage, and a benefit analysis. PECO does not object to elimination of the ECL and any correlating guidelines and solicitations.

IV. CONCLUSION

Any revisions to the existing ECL Guidelines should be designed to accommodate the communication preferences of all customers, ensuring inclusivity even for those who prefer not to engage electronically and those who face financial constraints. It is imperative that any ongoing tool encompass a comprehensive range of communication methods to effectively reach and engage all consumers, irrespective of their technological inclinations or challenges.

Respectfully Submitted,



By: _____

Jack R. Garfinkle (Pa. No. 81892)
Adesola K. Adegbesan (Pa. No. 326242)
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103
Jack.Garfinkle@exeloncorp.com
Adesola.Adegbesan@exeloncorp.com

Counsel for PECO Energy Company

Date: May 15, 2024