

May 15, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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

Dear Secretary Chiavetta:

On March 1, 2024 the Pennsylvania Public Utility Commission (the “Commission”) issued a Secretarial Letter in the above captioned docket seeking comments from all interested parties on the guidelines that govern the Eligible Customer List (“ECL”) that Electric Distribution Companies (“EDCs”) make available to Electric Generation Suppliers (“EGSs”). Specifically, the Commission is requesting comments concerning the use of electronic methods (in lieu of written notices sent via the U.S. Postal Service (“USPS”)) to deliver communications to customers concerning the ECL and the use of electronic methods for customers to respond to the utility with their ECL preferences.

FirstEnergy Pennsylvania Electric Company (“FE PA” or the “Company”) appreciates the opportunity to provide comments on this topic and respectfully submits these comments in response to the March 1, 2024 Secretarial Letter. These comments will start by providing background information detailing FE PA’s current ECL solicitation process. Then, the Company will discuss why it supports allowing electronic communications with customers regarding the ECL. Lastly, these comments will urge the Commission to consider transitioning to electronic communications for other similar customer communications that are currently required to be sent by USPS.

I. Introduction/Background

In accordance with the Final Order on Reconsideration entered on November 10, 2011 in Docket No. M-2010-2183412 (“Final Order”), FE PA (by and through its predecessor companies), began conducting its ECL solicitation in the first quarter of 2015. Since then, the Company has been updating its ECL every month and refreshing the ECL every three years (“PA Triennial Refresh”), as directed, providing customers an opportunity to restrict the inclusion of their information in the ECL that is provided to EGSs.¹ FE PA uploads its ECL to its EGS portal and

¹ FE PA provides access to the portal not just to EGSs’ but also to brokers and energy consultants.

uses the EGS portal to manage access. The EGS portal can only be accessed by entities that have a valid login.

FE PA sends communications about the ECL to its customers through its bill inserts. There are two different types of inserts regarding the ECL that the Company sends to customers: one is sent annually and included in March bills wherein customers can opt-out of the existing ECL (Appendix A) and the PA Triennial Refresh which “refreshes” the ECL such that it includes all eligible customers and then asks customers if they would like to opt-out (Appendix B). To opt-out, the customers must fill out the bill insert and mail it back, following the directions on the bill insert. The Company does not provide pre-paid envelopes. For customers who have opted out of a physical bill, FE PA uploads the bill inserts to its electronic billing (“ebill”) website. Ebill customers can log in to their account and opt out electronically. Additionally, customers can call our customer centers and request to be removed from the ECL.

II. FE PA Supports Electronic Methods of Communications for the ECL

FE PA supports the use of electronic methods for customer communications regarding the ECL. The current use of bill inserts to communicate a customer’s ability to opt-out is unnecessarily costly, resource intensive and does not align with changes in customer expectations and preferences which have drastically changed since the Final Order was issued in 2011. At present, production and printing of the bill inserts is costing the Company \$10,348.19 every year. The costs of the bill inserts are embedded in base rates as operations and maintenance (“O&M”). Ultimately, a reduction in these costs (and other printing costs such as those suggested in the section below) will reduce the budget required for communications and result in less costs being passed to customers. It should be noted that the \$10,348.19 production and printing cost does not include the cost of postage or labor because the company does not disaggregate the costs of postage or labor this way. However, when a customer mails back an ECL bill insert indicating their preference to opt-out, Company employees must process the incoming mail, route it to the correct individuals for processing and ensure that names are removed from the ECL for the next update.

FE PA remains committed to seeking ways to send a customer an email versus a paper copy through the mail. The Company’s customers can elect to receive electronic communications for certain types of alerts including, but not limited to, storm/weather alerts, reported & planned outages, bill available, payment due, no payment received, posted payment and meter read reminders. Further, FE PA is currently working on a “preference center” which will allow customers to select what types of communications a customer wants to receive and how they would prefer to receive it. If the Commission approves the use of electronic communications for the ECL, the Company can utilize its current platforms and vendors to enable this type of transition.

The Company asserts that moving to electronic communications rather than USPS also aligns with customer expectations and preferences. As evidence for this preference, the below charts reflect the number of FE PA customers that have moved from physical bills to ebill, broken down by Rate District. Table 1 reflects the data as of April 2023 and Table 2 reflects the data as of April 2024.

Table 1

April 2023 - eBill Count			Month over Month		Total Customers by Account	
Rate District	March	Enrolled	# Change	% Change	Total	% eBill
West Penn	261,826	263,131	1,305	0.50%	736,829	35.7%
Met-Ed	250,696	252,069	1,373	0.55%	587,552	42.9%
Penelec	198,046	199,040	994	0.50%	588,310	33.8%
Penn Power	66,597	67,079	482	0.72%	170,920	39.2%
TOTAL	777,165	781,319	4,154	0.53%	2,083,611	37.5%

Table 2

April 2024 - eBill Count			Month over Month		Total Customers by Account	
Rate District	March	Enrolled	# Change	% Change	Total	% eBill
West Penn	276,311	278,887	2,576	0.93%	738,971	37.7%
Met-Ed	267,012	268,664	1,652	0.62%	590,913	45.5%
Penelec	212,056	213,614	1,558	0.73%	588,613	36.3%
Penn Power	71,170	71,697	527	0.74%	171,662	41.8%
Total	826,549	832,862	6,313	0.76%	2,090,159	39.8%

These tables demonstrate that within a year, the increase in customers opting for ebill increased by 2.3% across FE PA. These numbers have trended this direction for the past several years. Given that the Final Order was issued in 2011, it does not account for these trends which show a customer preference for transitioning to electronic methods of communication.

III. Email Communications for Other Supplier-Related Communications

FE PA urges the Commission to extend its inquiry to other communications related to EGSs' which are currently required to be sent by USPS. For example, under 53 Pa Code §57.173, upon receipt of a notification from an EGS that a customer would like to change from their current EGS to another EGS or default service, the EDC must send the customer a letter noting the proposed change of EGS or change to default service. For the same reasons described above, the Commission should reconsider these requirements and those like it. Although statutory mandated to be mailed physically, such provisions are almost a decade old and do not align with the current

expectations of customers. Examples of other supplier communications that should become electronic include but are not limited to: customer education letters, supplier enrollments, supplier enrollment -dual, drop letters and welcome letters.

IV. Conclusion

In sum, the Company supports the use of electronic methods for communications related to the ECL. Further, FE PA urges the Commission to consider utilizing electronic communication methods for other communications that are currently required and occur through physical mail.

Very truly yours,



Darsh Singh

Counsel for FirstEnergy Pennsylvania Electric Company

DS/dml

cc: Jennifer Berrier, Executive Director
David Screven, Chief Counsel
Allison Kaster, Director, Bureau of Investigation and Enforcement
Lori Mohr, Director, Bureau of Consumer Services
Tom Charles, Director, Office of Communications
Daniel Mumford, Director, Office of Competitive Market Oversight
Kriss Brown, Deputy Director, Office of Competitive Market Oversight
Michele Tate, Manager, Bureau of Consumer Services
Tori Giesler, Managing Counsel, FirstEnergy
Matt Gregorits, Director of State and Federal Regulatory Affairs, FirstEnergy
Tracy Parmer, Consultant, PA Regulatory Affairs, FirstEnergy

YOU HAVE A CHOICE

Through Pennsylvania's Electric Choice Program, you can shop for the company that supplies your electricity – and even save money by selecting an electric generation supplier that is offering a lower price than your utility's default service rate.

Whether you choose an electric generation supplier or stay with your utility, we'll still deliver your electricity safely and reliably, and respond to any questions or problems with your service. **Please note: Customers enrolled in PCAP are not eligible to participate in Pennsylvania's electric choice program.**

IMPORTANT NOTICE REGARDING THE RELEASE OF ACCOUNT INFORMATION

Your utility maintains an eligibility list of customers. This list includes your name, address, customer number, account number and usage information and is made available to licensed electric generation suppliers. Please note that your telephone number is not included on the eligibility list. The information is used by suppliers to develop specific pricing offers in order to attract customers. The Pennsylvania Public Utility Commission (PUC) mandates that the information on this list be kept confidential and prohibits the release of this information to other individuals or entities without the customer's consent.

If you do not wish to have your customer information included on the list, you can:

- Visit firstenergycorp.com, log into your account, click on "Manage My Account" and then "Supplier Release Information" under the My Information tab.
- Complete the form on the back of this leaflet, and mail to FirstEnergy, 76 South Main St., A-FECC, Akron, OH 44308.
- Call us at 888-478-2300.

EVEN IF YOU PREVIOUSLY NOTIFIED US TO WITHHOLD CERTAIN INFORMATION FROM SUPPLIERS, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION (PUC) REQUIRES THAT YOU UPDATE YOUR PREFERENCE EVERY THREE YEARS.

To find out more about
Pennsylvania Electric Choice:

PAPowerSwitch.com

Pennsylvania Public Utility Commission

PUC.PA.GOV • 800-692-7380

Pennsylvania Office of Consumer Advocate

oca.state.pa.us • 800-684-6560

Complete and return only if you **do not** want your customer information to be included on the eligible customer list.

Remove my customer information from the eligible customer list that is made available to electric generation suppliers.

Name: _____

Address: _____

City: _____ State: _____

ZIP: _____ Phone: _____

Customer Number (20-digit number under the "Charges From Your Utility" section of your bill):

0 8 0

Mail completed form to:

FirstEnergy

76 South Main St. • A-FECC • Akron, OH 44308

FirstEnergy

Met-Ed • Penelec • Penn Power • West Penn Power

YOU HAVE A CHOICE

Through Pennsylvania's Electric Choice Program, you can shop for the company that supplies your electricity – and even save money by selecting an electric generation supplier that is offering a lower price than your utility's default service rate.

Whether you choose an electric supplier or stay with your utility, we'll still deliver your electricity safely and reliably, and respond to any questions or problems with your service.

IMPORTANT NOTICE REGARDING THE RELEASE OF ACCOUNT INFORMATION

Your utility maintains an eligibility list of customers. This list includes your name, address, account number and usage information and is made available to licensed electric generation suppliers. Please note that your telephone number is not included on the eligibility list. The information is used by suppliers to develop specific pricing offers in order to attract customers. The Pennsylvania Public Utility Commission (PUC) mandates that the information on this list be kept confidential and prohibits the release of this information to other individuals or entities without the customer's consent.

If you do not wish to have your customer information included on the list, you can:

- Visit firstenergycorp.com, log into your account, click on "Manage My Account" and then "Supplier Release Information" under the My Information tab.
- Complete the form on the back of this leaflet, and mail to FirstEnergy, 76 South Main St., A-FECC, Akron, OH 44308.
- Call us at 1-888-478-2300.

EVEN IF YOU PREVIOUSLY NOTIFIED US TO WITHHOLD CERTAIN INFORMATION FROM SUPPLIERS, THE PENNSYLVANIA PUBLIC UTILITY COMMISSION (PUC) REQUIRES THAT YOU UPDATE YOUR PREFERENCE EVERY THREE YEARS.

**To find out more about
Pennsylvania Electric Choice:**

Pennsylvania Public Utility Commission
www.PAPowerSwitch.com • 1-800-692-7380

Pennsylvania Office of Consumer Advocate
www.oca.state.pa.us • 1-800-684-6560

Complete and return only if you **do not** want your customer information to be included on the eligible customer list.

Remove my customer information from the eligible customer list that is made available to electric generation suppliers.

Name: _____

Address: _____

City: _____ State: _____

ZIP: _____ Phone: _____

Customer Number (20-digit number under the "Charges From Your Utility" section of your bill):

0 8 0

Mail completed form to:

FirstEnergy
76 South Main St. • A-FECC • Akron, OH 44308

Met-Ed® • Penelec® • Penn Power® • West Penn Power®

FirstEnergy Companies