

CITIZEN POWER

Public Policy Research Education and Advocacy

May 20, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Docket No. M-2014-2401127

Dear Secretary Chiavetta:

Enclosed for filing with the Commission on behalf of Citizen Power, Inc. are its Comments in the above-captioned proceeding.

Sincerely,

/s/ Theodore S. Robinson
Theodore Robinson
Counsel for Citizen Power

Enclosures

**BEFORE THE PENNSYLVANIA
PUBLIC UTILITY COMMISSION**

Duquesne Light Company Seamless Moves and Instant Connects Plan)) Docket No. M-2014-2401127

COMMENTS OF CITIZEN POWER, INC.

Citizen Power provides these Comments in response to the April 20, 2015 Revised Plan of Duquesne Light Company (“Duquesne”) Regarding Implementation of Seamless Movers and Instant Connects in the above-referenced proceeding.

I. Seamless Move Rules and Procedures

Citizen Power generally agrees that the proposed rules and procedures are a reasonable approach to implementing seamless moves. However, we do recommend a couple of minor changes to improve seamless moves from a consumer perspective.

First, paragraph 7 requires the customer to provide at least one business day’s notice prior to effectuating the seamless move. At the same time, paragraph 6 requires that the EGS provide at least one business day notice of any drop request prior to a customer’s service becoming active at a new location. This creates the potential for a customer to initiate a seamless move without giving the EGS adequate time to notify Duquesne that they do not intend to provide service for the customer at a new location. From the consumer’s perspective, being dropped by their EGS a

couple of days after a move might be confusing. In order to prevent this situation, Citizen Power recommends that Duquesne should give the EGSs an option to set as their default that they will not service their existing customers at new locations. This would allow Duquesne to inform the consumer, at the time of the seamless move request, that their existing EGS will not provide service at the new location. The other possible solution, increasing the amount of notice that customers must give before a seamless move, is not recommended because it would inhibit the ability of consumers to effectuate a seamless move in some situations.

Second, in paragraph 8, Duquesne proposes that a 3 day maximum gap in service would be allowed for a seamless move. Citizen Power believes that a 7 day maximum gap would be more in the interest of consumers. Sometimes real estate transactions have unexpected complications, resulting in minor changes of closing dates. The ability to avail oneself of a 7 day gap in service would accommodate consumers in these situations.

Third, paragraph 9 proposes that customers must request the start of new service and the end of old service in the same contact. Citizen Power agrees with this proposal because it clearly reduces the administrative burden on Duquesne. However, consumers may not be aware of this requirement. Therefore, we recommend that Duquesne should be required to inform customers of this requirement when they are requesting new service at a new location without cancelling existing service or if they are cancelling their existing service without setting up new service.

II. Work Plan

In paragraph 26, Duquesne mentions that the timely implementation of seamless moves and instant connects are dependent upon a “number of regulatory initiatives that it is implementing over the next two years.” Citizen Power requests that the Revised Plan be

supplemented with more detail regarding what specific initiatives Duquesne is referencing and what the impact may be upon the implementation schedule.

Respectfully Submitted,

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