

TRANSACTION REPORT

P. 01

MAY-20-2014 TUE 03:19 PM

FOR:

SEND

DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
MAY-20	03:19 PM	97833458	30"	3	FAX TX	OK	253	

TOTAL : 30S PAGES: 3

3054

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-Mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Sherry DelBiondo
 Agency: Pennsylvania Public Utility Commission
 Phone: 772-4597
 Fax: 783-3458
 Date: May 20, 2014
 # of Pages: 3

RE: PA Public Utility Commission's Regulation #57-306 (IRRC #3054)

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

TRANSACTION REPORT

F. 01

MAY-20-2014 TUE 03:21 PM

FOR:

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DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
MAY-20	03:20 PM	97722991	30"	3	FAX TX	OK	254	
TOTAL :						30S PAGES:	3	

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INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Robert M. Tomlinson, Chairman
 Agency: Senate Consumer Protection & Professional
 Licensure Committee
 Phone 787-5072
 Fax: 772-2991
 Date: May 20, 2014
 # of Pages: 3

RE: PA Public Utility Commission's Regulation #57-306 (IRRC #3054)

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TRANSACTION REPORT

F. 01

MAY-20-2014 TUE 03:22 PM

FOR:

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DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
MAY-20	03:21 PM	97831257	28"	3	FAX TX	OK	255	
TOTAL :						28S PAGES:	3	

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 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Lisa M. Boscola, Minority Chairman
 Agency: Senate Consumer Protection & Professional
 Licensure Committee
 Phone 787-4236
 Fax: 783-1257
 Date: May 20, 2014
 # of Pages: 3

RE: PA Public Utility Commission's Regulation #57-306 (IRRC #3054)

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

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P. 01

MAY-20-2014 TUE 03:23 PM

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DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
MAY-20	03:22 PM	97877424	43"	3	FAX TX	OK	256	
TOTAL :						43S PAGES:	3	

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 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Robert Godshall, Chairman
 Agency: House Consumer Affairs Committee
 Phone: 783-6428
 Fax: 787-7424
 Date: May 20, 2014
 # of Pages: 3

RE: PA Public Utility Commission's Regulation #57-306 (IRRC #3054)

URGENT!

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TRANSACTION REPORT

P. 01

MAY-20-2014 TUE 03:25 PM

FOR:

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DATE	START	RECEIVER	TX TIME	PAGES	TYPE	NOTE	M#	DP
MAY-20	03:23 PM	97837558	1' 20"	3	FAX TX	OK	257	
TOTAL :						1M 20S	PAGES:	3

Facsimile Cover Sheet



Phone: (717) 783-5417
 Fax #: (717) 783-2664
 E-mail: irrc@irrc.state.pa.us
 Website: www.irrc.state.pa.us

INDEPENDENT REGULATORY REVIEW COMMISSION
 333 MARKET STREET, 14TH FLOOR, HARRISBURG, PA 17101

To: Honorable Peter Daley, Minority Chairman
 Agency: House Consumer Affairs Committee
 Phone: 783-9333
 Fax: 783-7558
 Date: May 20, 2014
 # of Pages: 3

RE: PA Public Utility Commission's Regulation #57-306 (IRRC #3054)

URGENT!

Section 5.1(j) of the Regulatory Review Act (71 P.S. § 745.5a(j)) requires us to forward to you any documents we receive during the 48-hour blackout preceding our public meeting, upon receipt. **Please distribute this material to the appropriate regulatory staff as soon as possible.**

EMBARGOED MATERIAL

3054.

Greg Dudkin
President



PPL Electric Utilities

Two North Ninth Street, GENNS
Allentown, PA 18101-1179
Tel. 610.774.6077 Fax 610.774.2881

May 19, 2014

The Honorable John F. Mizner, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

2014 MAY 20 PM 2:06

RECEIVED
IRRC

Re: Amending Regulations Regarding Standards for Changing a Customer's Electricity Generation Supplier, PUC Docket No. L-2014-2409383, IRRC No. 3054, Regulation 57-306

Dear Chairman Mizner:

In response to the above referenced regulations proposed by the Public Utility Commission ("PUC" or the "Commission"), I am writing to express PPL Electric Utilities Corporation's ("PPL Electric" or the "Company") support for accelerating the switching process in a fashion that will ultimately permit Pennsylvania retail electric customers to change suppliers within three business days. This position is consistent with PPL Electric's long-standing role as a leading proponent of retail electricity competition in Pennsylvania. PPL Electric is a regulated electric distribution company ("EDC") and subsidiary of PPL Corporation headquartered in Allentown, PA. PPL Electric furnishes electric distribution, transmission, and default service to approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania. As part of its responsibilities, the Company maintains customer accounts, and administers billing and energy settlement systems that perform the "switching" functions that are the subject of this rulemaking.

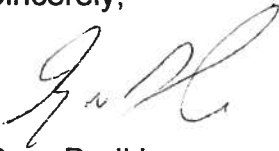
PPL Electric currently is working to implement a three business day switch for customers as required by the proposed regulations. PPL Electric places a high-priority on implementing a shortened supplier switch timeframe recognizing the benefits to customers and the retail electricity market. However, implementing such a significant change to the Company's systems and processes presents significant risks and challenges. In this regard, PPL Electric would like to identify two implementation issues resulting from the proposed regulations. First, while the rulemaking order recognizes the possibility of waivers of the implementation schedule, the proposed regulations are silent on this issue. PPL Electric believes that flexibility around the required

implementation deadline of six months is needed to avoid potential issues associated with a rushed implementation such as customer confusion or inaccurate billing.

Second, while the rulemaking order addresses the potential for future cost recovery, EDCs are not provided assurance of cost recovery, but simply the right to seek such recovery. The proposed regulations are silent on this issue. PPL Electric is committed to implementing a three business day supplier switch in the most cost-effective manner possible. However, the Company anticipates that the sweeping modifications it must make to its systems and processes will result in significant costs. PPL Electric believes that it is necessary to provide more certainty around full recovery of all reasonable costs associated with implementing a three business day switch.

PPL Electric thanks the Independent Regulatory Review Commission for its consideration of the Company's comments in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Dudkin', written in a cursive style.

Greg Dudkin