

**Index of PECO’s Response to the Topics Set Forth in the Secretarial Letter Issued
on January 23, 2020 at Docket No. M-2019-3007101**

<u>Secretarial Letter Topic</u>	<u>PECO Witness</u>	<u>PECO DSP V Filing Reference</u>
<p>1. “[W]e request that the large EDCs, in their next DSP filings, provide information and analysis on their NSPL/PLC cost allocation calculations and why they use such cost allocation for consideration by the Commission. This analysis should also include a discussion on why any large EDC may still be using monthly summary usage data instead of actual customer usage data to determine PLCs/NSPLs, and what steps and timelines, would be needed to implement a change to their current practice, as well as any associated costs.”</p> <p>Secretarial Letter, p. 5.</p>	John J. McCawley	PECO St. No. 2, pp. 37-39.
<p>2. “While the adoption rate of EVs is a matter of speculation, it is indisputable that during the timeframe covered by the upcoming DSP’s, EV use will increase. With that said, we find that TOU rates, especially in the context of EV expansion, needs to be explored further, especially whether the lack of TOU rate offerings for operators of EVs presents a barrier to EV adoption. Accordingly, we urge all parties participating in the upcoming DSP proceedings to consider how EV specific TOU rate offerings could be made available to consumers.”</p> <p>Secretarial Letter, pp. 6-7.</p>	Joseph A. Bisti	PECO St. No. 2, pp. 15, 30.
<p>3. “We request that the EDCs include in their filings evidence showing how its DSP proposal complies with the prudent mix requirements of the Public Utility Code and case law.”</p> <p>Secretarial Letter, p. 8.</p>	John J. McCawley Scott G. Fisher	PECO St. No. 2, pp. 10-20, 22-25. PECO St. No. 4, pp. 22-31.
<p>4. “We find that it may be worthwhile for the Commission and the large EDCs to closely examine the history of PTC changes over the past few years to see if a 6-month PTC change interval would have provided more stability. Accordingly, we request that the large EDCs include in their upcoming DSP filings a 10 year history of their PTC changes and assess the benefits of a 6 month PTC change compared to a 3-month PTC change. EDCs are also free to propose other PTC change intervals that change no more frequently than on a quarterly basis.”</p> <p>Secretarial Letter, pp. 8-9.</p>	Joseph A. Bisti	PECO St. No. 2, pp. 29-30. PECO Exhibit JAB-10
<p>5. While not a topic of the proceeding at this docket, the Commission wants to take this opportunity to remind the EDCs and all interested parties to assess how Customer Assistance Program (CAP) customers can participate in the competitive market in future DSP proceedings. This topic has been addressed in various dockets, and we refer all parties to these dockets for more information. In addition,</p>	Carol Reilly	PECO St. No. 3, pp. 3-17.

<p>parties should review the most recent Commission actions on this topic, including how CAP-shopping was addressed in the FirstEnergy EDCs DSP IV proceedings and the Commission’s proposed CAP-shopping policy statement. While we acknowledge that the proposed policy statement is unlikely to be final and effective in time for some of the upcoming DSP proceedings, we still think the EDCs and interested stakeholders should consider the issues and concerns raised by the Commission and commenters in that proceeding in any future DSP proceeding. We suggest that all the EDCs with CAP programs, as well as interested stakeholders, consider the issues and concerns raised by the Commission in the above-noted prior proceedings when developing their CAP shopping proposals in the upcoming DSP filings.</p> <p>Secretarial Letter, pp. 9-10.</p>		
<p>6. “Another topic not included in this docket, but again we think it prudent to mention because it has been a subject litigated in past DSP proceedings, is Standard Offer Program (SOP) scripting language. These are the scripts used by the EDCs and their vendor call centers to refer customers to the SOPs. We direct the EDCs and all interested parties to our most recent statement on SOP scripting as found in the 2018-2019 FirstEnergy DSP proceeding; specifically, the February 28, 2019 order, in that proceeding. We suggest that EDCs, when preparing their upcoming DSP filings, review the Commission’s actions in the above-noted FirstEnergy proceeding and to include in their filings analyses of their SOPs, the current scripting, and any proposed scripting that adequately informs customers about the SOPs while maintaining important safeguards and protections.”</p> <p>Secretarial Letter, p. 10.</p>	<p>Carol Reilly</p>	<p>PECO St. No. 3, pp. 17-18.</p>