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House Bill 473
Electricity - Change of Address - Maintenance of Subscriptions and Contracts

House Bill 473 would require an electric company to maintain a subscription to a community solar energy generating system or a competitive electric supply contract if a customer has a change in his or her service address within the same electric territory as the old address. HB473 addresses what is commonly known as “seamless moves”.

Under today’s regulations, if a customer changes his or her service address, the customer will revert to Standard Offer Service and a re-enrollment must occur to move the customer back to the competitive supplier. Previously re-enrollment could only happen after the close of the current billing cycle, but significant improvements were made by the utilities in order to accommodate re-enrollment within 3 Business Days, which is currently the time period during which re-enrollment occurs.

Seamless moves have been debated and discussed before in Maryland. In 2018, the Public Service Commissions (PSC) PC44 Competitive Markets and Customer Care (CMCC) Workgroup examined the concept of seamless moves. Participating utilities in the CMCC Workgroup, including Pepco and Delmarva Power, were asked to estimate implementation costs associated with effectuating seamless move policies in Maryland as well as provide data regarding how many customers utilize this feature in other jurisdictions. The estimated cost provided by Pepco and Delmarva Power at that time to migrate to a seamless move system could reach as much as \$1.3 million. The data provided from Pennsylvania demonstrate that only a very small portion of utility customers utilize the seamless move functionality.

The CMCC Workgroup generated proposed draft regulations related to seamless moves for use by the PSC if they concluded that pursuing these policies was appropriate for Maryland ratepayers. The PSC initiated rulemaking proceeding 62 (RM62) to further evaluate seamless moves based on the work done by the CMCC Workgroup. The PSC voted against adopting the rule on seamless moves noting that it was not cost effective to have electric utilities incorporate a supplier’s ability to implement seamless transitions for customers with existing service.

Finally, the system change needed to implement seamless moves in Pepco and Delmarva Power cannot be implemented until 2023 due to a separate system upgrade that is fully designed and scheduled to go into production in late 2021.

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