**From:** Stephen Bennett – Exelon/Constellation
**Sent:** Friday, January 04, 2013 11:51 AM
**To:** naesb
**Subject:** Exelon/Constellation Comments on NAESB Retail Customer Authorization Form

Dear Ms. Trum

Exelon/Constellation submits these comments on the NAESB Retail Request for Comments on the Retail Customer Authorization Form.  Generally, we find the NAESB LOA form to be well structured.  However, our experience has shown that simplifying the form to the greatest extent possible lessens the occurrence of customer errors.  As such, many of our comments focus on the length and requested detail on the form itself.

1.       Not all utilities require that these types of forms be provided to the utility.  In some cases, the retail supplier keeps the form and provides it to the Commission upon request, like New York.  Consequently, we recommend that the directions about what to do with the form should be provided separately and not included on the form itself or two options should be provided.  We consider it optimal for retail markets that licensed suppliers hold the forms and no submittal to the utility be required, so we do not recommend that the NAESB form assume the forms must be provided to the utility.

2.       The  verbiage should indicate that signing this form in no way binds the customer to purchase services from the supplier.

         Ex. This authorization in no way binds me to the purchase of any service or product from the Company named herein and is to be used for the sole purpose of determining my offer price of electricity service or the provision of energy-related services.

3.       Data Range – In the middle of the form the date range determines the date the LOA starts and expires.  This should be moved below the expiration date.  If an expiration date is not sufficient, then the customer will have the opportunity to specify when the LOA should start and expire. Ideally, we would prefer that the entire data range be removed and only provide the expiration date. This extends the possible life of the LOA.

4.       Summary and Interval Usage Request – We recommend combining the two and also removing the option of selecting specific intervals.  We do not believe that customers generally know how the utilities send interval usage to the supplier which may create confusion.

5.        Specific Data to be Provided (kWh, kW, kVa, kVarh, and gas Usage) – To the best of our knowledge, we do not believe that this information is required by utilities.  To minimize confusion we recommend removing this option completely.

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