



Via Electronic Filing

June 16, 2010

Terry J. Romine, Executive Secretary
Public Service Commission of Maryland
William Donald Schaefer Tower
6 Saint Paul Street
Baltimore, Maryland 21202-6806

Re: Rulemaking 17: Supplement 441 to P.S.C. Md. E-6

Dear Ms. Romine:

In a June 10, 2010 letter order, the Commission directed Baltimore Gas and Electric Company (BGE) to implement certain modifications to its Electric Supplier Coordination Tariff in RM17 with an effective date of July 15, 2010. As of the filing of this letter, the Commission has not issued an order in RM35, the gas corollary to RM17. As a combined gas and electric company with one billing system, BGE designed, programmed and tested the requirements of RM35 and RM17 as it relates to the purchase of receivables (POR) simultaneously, which is both logical and cost effective. It is logical because RM17 and RM35 were progressing on parallel paths and because if it makes sense, as a matter of public policy, to implement POR on the electric side, it would also make sense to implement it on the gas side. It is cost effective because there is far less work involved in setting up a single, combined IT process at one time versus setting up an electric process at one time and coming back at a later time to add a similar gas process.

BGE has consistently stated throughout both rulemaking processes that while certain aspects of RM17 and RM35 could be implemented separately, aspects related to billing, such as calculating and generating bills, purchasing receivables, and posting payments are very difficult to separate. Once implemented, BGE will be purchasing all supplier receivables using BGE's consolidated billing from the effective date going forward. BGE's programming for POR does not allow for any current energy charges on BGE's bill not to be purchased. Put another way, once POR is implemented, BGE will not have the ability to purchase receivables associated with one fuel type and apply the previous payment posting to the current receivables of another fuel type.¹

¹ BGE can continue to apply the previous posting priority to both electric and gas receivables existing prior to the effective date, but cannot separate the posting method and POR between electric and gas.

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Page 2

For the foregoing reasons, BGE respectfully requests an implementation date that is identical for both electric and gas POR.

Respectfully submitted,

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

Kimberly A. Curry

cc: Paula M. Carmody, Office of the People's Counsel