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December 12, 2013

VIA OVERNIGHT DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Investigation of Pennsylvania's Retail Natural Gas Supply Market
Docket No. I-2013-2381742

Dear Secretary Chiavetta:

Enclosed for filing is one copy of the Comments of Columbia Gas of Pennsylvania, Inc. is response to the Commission's September 12, 2013 Order in the referenced matter.

If you have any questions regarding this filing, please do not hesitate to call me at 724-416-6355.

Very truly yours,

Theodore J. Gallagher

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation of Pennsylvania's Retail Natural Gas Supply Market	: :	Docket No. I-2013-2381742

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

COMMENTS OF
<u>COLUMBIA GAS OF PENNSYLVANIA, INC.</u>

I. Introduction

On September 12, 2013, the Pennsylvania Public Utility Commission ("Commission") issued an Order in the captioned proceeding ("Order"), by which it initiated an Investigation of Pennsylvania's Retail Natural Gas Supply Market ("GRMI"), and sought comments from industry participants by December 12, 2013. Columbia Gas of Pennsylvania, Inc. ("Columbia") hereby submits its Comments in response to the Order. At the outset, Columbia wishes to note that it appreciates the opportunity to provide Comments to the Commission, and looks forward to continued participation in this matter. Also, Columbia commends to the Commission's attention the Comments filed in this matter by the Energy Association of Pennsylvania.

As described below, Columbia has been a trailblazer in the development of competitive alternatives for its customers. Columbia believes that it continues to operate the most successful gas alternative supply program for residential and small commercial customers in Pennsylvania with a history of the broadest Natural Gas Supplier ("NGS") and customer participation.

As a preliminary matter, Columbia wishes to draw attention to an important distinction between the market dynamics that the Commission considered in the context of its Investigation into Pennsylvania's Retail Electricity Market at Docket No. I-2011-2237952 and those that exist within the natural gas retail market. In the electric industry, a retail market did not exist until legislation was enacted, resulting in one set of rules, terms and conditions applying to all customer classes. By contrast, the natural gas retail market evolved differently among customer classes. For example, gas transportation for commercial and industrial customers evolved organically 25 years ago with much success realized from interruptible service, multiple supplier options, and competition including the Natural Gas Distribution Companies ("NGDC") as a firm alternative option. Meanwhile, gas transportation for residential and small commercial customers developed incrementally by way of small pilot programs approved by the Commission, leading to expansion of such pilot programs, and eventually leading to full availability after the passage of the Natural Gas Choice and Competition Act.

Columbia recommends that the Commission's focus in this matter be limited to residential and small commercial customers. Alternatively, Columbia recommends that this matter be segregated to consider issues separately for residential and small commercial customers ("Small Customer Market") versus commercial and industrial customers ("C&I Customer Market"). Columbia makes this suggestion for two reasons:

a) With 67% of the commercial and 99% of the industrial load across Pennsylvania supplied by NGSs[1], it is evident that these two classes of customers already recognize that there are benefits of gas transportation for their gas supply needs. Eight of the eleven NGDCs individually exceed the 67.4% and/or 99.5% statewide total. It is obvious from these statistics that further investigation of the C&I Customer Market should not be the focus of the GRMI, and that it should be allowed to continue to evolve and flourish without further intervention or regulation, and continue to reflect the uniqueness of each NGDC's distribution system.

b) The significant differences between the Small Customer Market and the C&I Customer Market programs will belabor the proceeding and may delay a final outcome. Such was the situation when the various SEARCH collaborative groups attempted to address various aspects of gas supply service for all customer classes. Ultimately a decision was made to address only residential and small commercial transportation programs (Small Customer Market).

II. Columbia Program Highlights

In the late 1980s Columbia's first Transportation Service customer was established.

In November 1996, Columbia offered a Choice[2] pilot program available to 36,000 customers in Washington County, Pennsylvania, which provided an opportunity for its residential and small commercial customers to buy their natural gas from a variety of competitive NGSs.

In November 1997, the availability of the Columbia Choice pilot program expanded to Allegheny County and an additional 101,000 eligible customers.

In November 1998, the pilot program moved into Beaver, Butler, York, Franklin and Adams counties bringing eligibility to a total of 270,000. By January 1999, 54,661 (20%) of eligible customers were participating in Columbia's Choice program.

The Pennsylvania State Legislature passed the Natural Gas Choice and Competition Act in June of 1999. In November 1999, Columbia's permanent Choice program was made available

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[1] Based on the PUC website page reflecting Monthly PAGasSwitch Update Customers Switching to a Natural Gas Supplier and provided as Attachment A.

[2] Customer CHOICE℠ is a service mark of Columbia Gas of Ohio, Inc., and its use has been licensed by Columbia Gas of Pennsylvania, Inc. CHOICE® is a registered mark of Columbia Gas of Ohio, Inc. and its use has also been licensed by Columbia Gas of Pennsylvania, Inc.

to all 388,000 of Columbia's residential and small commercial (using less than 600 Mcf/year) customers.

In Docket No. R-2009-2149262, the potential for participation in Columbia's Choice program expanded when the eligibility requirements were amended to include commercial customers using up to and including 4,000 Mcf annually.

In July 2013, eligibility was once again expanded to allow commercial customers using up to and including 64,400 therms annually to participate in Choice. (Docket No. R-2012-2321748.) As of October 2013, 106,644 (28%) of eligible residential customers and 8,095 (22%) of eligible commercial customers participate in Columbia's Choice program.

As evidenced by the extensive history of the Columbia Choice program, Columbia's customers have been provided the opportunity to choose an alternate supplier for over 17 years. While some have chosen an alternate supplier for their gas supply, the majority of customers have chosen to remain on Columbia's sales service.

III. Responses to Commission Questions

In its Order, the Commission posed eight questions, to which it sought responses from interested parties. Columbia will address each of the questions below.

1. What is the current status of retail natural gas competition for customers, by class and by service territory, and for NGSs? For each such customer class and service territory, how accessible are competitive suppliers?

Table 1 below provides the requested information for Columbia's service territory as of October 31, 2013. In addition to the eighteen Choice NGSs currently serving residential and small commercial customers on Columbia's system, there are an additional eleven Commission licensed NGSs who have sought and received approval to provide Choice service on Columbia's system and are in various stages of implementing marketing campaigns.

Table 1	Residential	Commercial	Industrial	Total
Total Customer Numbers	376,864	39,230	501	416,595
Number (#) of Customers Using Alternative Suppliers	106,644	10,495	213	117,352
Percent of Customers Using Alternative Suppliers	28.3%	26.8%	42.5%	28.2%
Number of NGSs serving customers	17 Choice NGSs	18 Choice NGSs 20 TS[3] NGSs	15 TS[5] NGSs	Not Applicable
Customer Load (Mcf/yr) Using Alternative Suppliers	228,228	551,066	1,541,305	2,320,599
Total Customer Load (Mcf/yr)	719,587	809,454	1,549,099	3,078,140
Percent of Load From Alternative Suppliers	31.7%	68.1%	99.5%	75.4%

2. **Are currently effective NGDC rates properly structured to reflect the separation between the costs of the NGDC's role as a distribution utility and its role as a Supplier of Last Resort (SOLR)?**

In its 2008 base rate case at Docket No. R-2008-2011621, Columbia removed its gas supply uncollectible costs from distribution rates charged to all customers, and added them to gas supply costs on monthly bills. On June 23, 2012 the Commission labeled this gas supply component the Merchant Function Charge and required all NGDCs to implement this change.

At Docket No. L-2008-2069114, NGDCs were ordered to establish a Gas Procurement Charge ("GPC"), identifying and encompassing costs associated with the gas procurement portion of its business. The GPC was introduced to move costs associated with the NGDC gas procurement function out of distribution charges and bill them only to customers purchasing their gas supply from the NGDC so that sales service customers would pay the costs for gas supply as well as the cost to obtain the gas supply. Columbia's GPC became effective with the

[3] "TS" refers to Columbia's interruptible transportation service program for Commercial and Industrial customers.

July 2013 billing cycle. Included in the GPC are employee labor costs, software costs, maintenance costs and administration costs.

Even with these changes, Columbia believes that further rate modifications could be implemented so that cost recovery reflects cost causation. This would involve not only the separation between the costs of the NGDC's role as a distribution utility and its role as SOLR, but would also reflect a separation of the NGDC's costs associated with its role as an administrator of retail market functions.

While there are costs incurred by NGDCs that are a direct result of the administration of its SOLR and distribution utility functions, it should also be recognized that there are administrative, maintenance, and programming costs incurred by the NGDCs that are a direct result of facilitation of the natural gas retail market. Since the passage of the Choice and Competition Act in 1999, significant expense has been, and continues to be, incurred by NGDCs to implement and administer various aspects of the gas retail market, which are collected from all classes of customers through base rates. While all of these costs were/are associated with the retail market, not all of the expenses benefit the customers paying for these costs through their distribution charges. Instead, the majority of the changes and the associated costs of those changes are Commission-ordered to facilitate the administration of the natural gas retail market, reduce NGS risk, and entice NGSs into the Pennsylvania market. This form of retail market subsidization continues today, and will continue unless specific direction is given to recover those expenses from NGSs, or a specific customer class or group.

The costs associated with both the C&I Customer Market and Small Customer Market programs continue to be imbedded in the distribution rates that are billed to all customers and, therefore, customers electing to purchase their gas supply from NGDCs are absorbing costs for providing C&I and Small Customer Market Programs. Columbia encourages the Commission to consider breaking the costs caused by natural gas retail market programs out of the distribution charges billed to all customers and have them billed directly to the customers and/or the NGSs who are benefiting from these services in the same manner that SOLR costs and gas supply uncollectible costs were removed from base rates and added to the NGDC's gas supply cost.

Columbia also encourages the Commission to consider a straight-fixed-variable rate design that will illustrate for customers the distinction between the fixed costs of facilities such as pipes and meters from variable gas supply costs. Since fixed costs are not usage based in nature, they should not be recovered on a usage basis. This worthwhile change would help a customer more clearly understand the differences between the distribution services that the NGDC provides and the gas supply portion of the monthly bill based on consumption.

Rates will not be properly structured until the costs for offering retail market programs incurred by NGDCs are funded by the parties benefiting from the changes that are represented by those costs.

3. **Does the existing market design of NGDCs serving as the SOLR present barriers that inhibit customer choice or prevent suppliers from fully participating in the retail market?**

Columbia continues to operate what it considers to be very successful C&I Customer Market and Small Customer Market programs. Columbia has 21 suppliers currently providing gas supply to C&I Customer Market customers and 18 suppliers participating in the Choice program offered to its residential and small commercial customers. Based on the number of suppliers participating in these programs, it is evident that these are successful programs and that Columbia's SOLR role does not appear to be presenting a barrier to entry into the retail market.

4. **Should NGDCs continue in the role of SOLR?**

Columbia believes it is imperative that NGDCs maintain the SOLR role. Columbia believes the SOLR retains the responsibility to maintain safe and reliable service and ensure that adequate supplies are available to satisfy daily, seasonal and annual requirements for residential, small commercial, small industrial, other essential human needs customers and any other customer class that falls within the SOLR function. Included in the SOLR function are sales to customers that have not chosen an alternate supplier, or choose to be served by the SOLR. The SOLR also provides gas supply to customers whose NGS fails to deliver their requirements.

Consistent with its role as a public utility, and as the SOLR, Columbia maintains safe and reliable service by providing those services it is uniquely qualified to provide and manage. These include: (1) management of distribution mains and services from the city gate to the burner tip; (2) determination of customer requirements; (3) management of city gate requirements; and (4) assuring that adequate capacity is available in the long-term to satisfy the requirements of its residential customers and the human need requirements of its small commercial and industrial customers even under extreme (design) conditions. Items (1) through (4) will be addressed in more detail below.

Columbia's SOLR responsibilities as they pertain to distribution mains and services include (a) field management of maintenance, customer service, regulation and measurement; (b) gas control operations; (c) development and maintenance of effective on-system nominations systems; (d) development and enforcement of supply reliability requirements, including implementation of OFO/OMOs and other system management tools provided for in the tariff; and (e) management of any on-system storage, peaking or other supply related assets.

Columbia's SOLR responsibilities as they pertain to determination of customer requirements include calculation of annual customer requirements and associated daily NGS deliveries, establishment of peak day design criteria and determination of firm and non-firm design peak day requirements.

Columbia's SOLR responsibilities as they pertain to the management of city gate requirements include: (a) the determination of maximum daily delivery requirements at each point of delivery with interstate pipelines; (b) provision of a city gate balancing service to accommodate differences between supplier deliveries and customer demand including gas distribution service customers; (c) management of the annual Choice true-up process, whereby the differences between supplier deliveries and customer consumption is reconciled; (d) evaluation of NGS requests for utilization of alternate delivery points; (e) maintenance of a back-up supply in the event of an NGS failure; and (f) development and administration of a plan for dealing with an NGS failure.

Columbia's SOLR responsibilities include assuring that long-term capacities are available for human needs customers. Reliability of service to human needs customers requires that access to firm capacity be without question. In today's energy environment, that assurance is only accomplished through the maintenance of long-term capacity assets that do not disappear because of an election of a NGS to exit the business, bankruptcy, or more favorable economic options serving other segments of the natural gas marketplace. These human needs customers do not have a choice in the utilization of natural gas. They need it for the essential life sustaining uses of heating their homes and cooking their meals. The maintenance of firm capacity on an unquestioned basis is essential in assuring reliable service. This long-range process ensures that adequate pipeline capacity is available to satisfy customer requirements and that adequate contractual commitments exist at each point of delivery to satisfy maximum daily delivery requirements and pressure obligations.

As discussed above, it is imperative that NGDCs maintain the SOLR role and continue to provide the services herein described in order to ensure reliability of service to customers.

5. Are there enhancements and updates to the current SOLR model that would further improve the state of competition within the retail natural gas market?

a. Are there opportunities through the potential restructuring of the SOLR model and retail gas market to encourage expansion of natural gas distribution facilities into area of the Commonwealth that do not currently have access to natural gas facilities?

Columbia is not aware of any restructuring of the SOLR function or retail gas market that would encourage such expansion. To encourage expansion of natural gas distribution facilities into areas of the Commonwealth that do not currently have access to natural gas, Columbia submits that customers simply need to know of the cost savings they could receive by switching from propane or oil to natural gas. To that extent, permitting gas utilities to recover a modest amount of customer education costs for those customers near existing distribution facilities would go a long way toward cost-effective system expansion.

b. Are there changes to the retail natural gas market that the Commission can undertake *de novo* through regulation or policy that would promote retail natural gas competition?

Educating customers on all of the available options, including purchasing from the NGDC, seems to be the key to promoting retail natural gas competition.

Any educational costs incurred by the NGDC should be recoverable. It should be recognized that not all customers are interested in acquiring supplies from an alternate supplier and would rather continue purchasing from the NGDC.

A statewide, PUC implemented, combined electric and gas residential consumer education program could be beneficial, cost effective and has historically been proven to increase the number of shopping customers across both types of utilities. While program operations differ, the information about shopping should be readily applicable to both types of service.

c. Are there changes to the retail natural gas market that the Commission can undertake *de novo* through regulation or policy that would remove barriers to retail natural gas competition?

With over 28 percent of Columbia's residential and small commercial customer population taking Choice service and thirty-two individual Natural Gas Suppliers providing competitive natural gas supply services on its system, Columbia does not believe there are barriers to retail natural gas competition on its system and suggests that any changes should be undertaken on a utility by utility basis rather than statewide. Any and every recommended change must be analyzed to determine the cost impact, and the freedom to choose or not to choose, to non-shopping customers.

d. What legislative changes should be made to further improve the retail natural gas market in Pennsylvania?

The retail natural gas market would benefit from the swift passage of House Bill 1188, which would eliminate the over-under collection adjustment billed to customers who transfer from NGDC sales service to transportation service.

6. Are there outcomes from the Commission's recently completed electric RMI that would be applicable and useful to implement in the retail gas market? To the extent possible, please provide comments on the following topics:

a. Seamless Move

When a current Choice customer moves within an NGDC territory, and chooses to continue their participation in Choice with their current NGS, a seamless move makes sense, provided that the customer specifically states they want to continue with the NGS at the time they contact the NGDC to schedule service at the new address.

b. Accelerated Switching Timeframes

At the request of the NGSs and in order to accelerate switching Columbia agreed in the settlement of its most recent base rate case, upon completion of the necessary system programming, to eliminate its "freeze period" for Choice enrollments and process enrollment and drop transactions each processing day. Currently NGSs are unable to submit enrollment requests during the freeze period which extends from the 16th through the 20th of the each month. Because of other programming demands, Columbia is not able to guarantee the implementation of this change before April 2015.

c. Standard Offer Program

Columbia encourages the Commission to study this issue in great depth before developing an initiative in this regard. There are significant operational differences between electric and gas, and among the various NGDCs, and any standard offer program must be designed by the individual NGDCs to take these differences/complexities into consideration.

d. Low-income customer shopping

Shopping is currently available for Columbia's low-income customers.

Since 2000, Columbia's Customer Assistance Program ("CAP") has included a shopping component in which Columbia acts as agent for the CAP aggregated customers and solicits NGSs via a Request for Proposal ("RFP"). In July, 2000, Columbia provided its "CAP Portability Feasibility Study" to the Commission which analyzed various methods of providing Choice to its low-income CAP population. The study recommended the continuation of Columbia's aggregation of CAP customers because it minimized cost risks to non-CAP customers while capitalizing on potential savings from an alternate NGS.

Columbia's CAP aggregation is a form of low-income shopping that has many benefits. Non-low-income customers benefit when an NGS is awarded the CAP contract because the CAP aggregation results in a CAP gas supply cost that is lower than Columbia's Price to Compare, which lowers the cost of CAP that is passed through to them. The CAP NGS benefits because Columbia purchases the gas supply with no Purchase of Receivables discount, the monthly quantity of gas delivered only changes every six months, Columbia's firm pipeline capacity is assigned for 100% of the gas deliveries, and the NGS receives full payment monthly based on its deliveries rather than CAP customer usage or payments. The portability study also found that CAP customers were not interested in shopping and preferred Columbia to act as an agent on their behalf.

When submitting a bid in response to the RFP for the CAP aggregation, the NGS must provide either a percentage discount or monetary discount to the Price-to-Compare, with the option of a one or two year contract period.

Columbia's current NGS CAP aggregator has been providing gas supply to the CAP at a discount to the Price-to-Compare since July 2011.

Columbia's CAP aggregation is superior to individual low income customer shopping in Pennsylvania because it guarantees savings to the Purchased Gas Cost for CAP customers and to non-CAP customers who subsidize the CAP. Low income customers shopping individually could easily be incented by an up-front bonus for signing up such as a gift card or tickets to a sporting event, and do not have an incentive for obtaining a low cost gas supply product because they are billed a fixed amount monthly without regard to their gas supply rate.

All customers win with Columbia's aggregation and for that reason alone, Columbia's CAP aggregation is the gold standard for low income shopping.

e. Expanded Consumer Education about shopping

Columbia addressed education in its response to 5. b. above and reiterates that consistent, statewide combined gas and electric residential consumer shopping education is likely to increase the number of shopping customers based on past experience. Additionally, any such statewide program must include cost recovery by the NGDCs for any expenses incurred.

f. Any additional RMI initiative that would translate well to the retail natural gas market

There were significant changes implemented during the Electric Retail Market Investigation after much discussion, investigation and review. After reviewing all comments, if the Commission determines there are changes necessary statewide through the GRMI, Columbia urges the Commission to allow the same amount of investigation, discussion and review for each of the changes because of the various differences between the natural gas and electric industries.

7. To take advantage of the opportunity that is present through the Marcellus Shale resource, should NGDCs and NGSs be encouraged to explore opportunities with natural gas exploration and production companies?

NGDCs must continue to maintain a diverse supply and capacity portfolio. Both NGDCs and NGSs should be encouraged to explore opportunities associated with Marcellus Shale gas where and when it is practical and cost effective, just as with any other supply opportunity. It should be recognized that the availability of Marcellus Shale gas has greatly reduced the price of natural gas in the marketplace. Customers are benefitting from these lower gas costs even though there may be little to no Marcellus Shale gas delivered directly into the NGDC's distribution facilities.

8. **Recognizing that the Commission withdrew the proposed rulemaking addressing NGDC business practices at Docket No. L-2009-2069117 and committed to commencing a new proposed rulemaking on these issues, please provide comments on the continued need to address standardized supplier tariffs and business practices with regard to imbalance trading, tolerance bands, cash out and penalties, nominations and capacity.**

Columbia considers the Rules Applicable to Distribution Service section of its current tariff as its "supplier tariff." This section of the tariff provides NGSs with all of the rules associated with providing natural gas supply services (whether Choice Service or General Distribution Service) on Columbia's system. The RADS is logically and physically separated from the rest of Columbia's tariff and, more importantly, it was developed after an extended period of collaboration and negotiation with the NGSs and other stakeholders after the Commission issued its Choice regulations in the early 2000s. Any modifications to those provisions would need to be done in a manner so as to respect the negotiations that were conducted and to reflect the unique system characteristics of Columbia's system that resulted in the Rules. NGDCs across Pennsylvania have different system limitations and contracts for storage and capacity that cause varying degrees of complexity. Development of a standardized content within tariffs when NGDCs have such varying degrees of complexity may threaten a NGDC's ability to provide safe, reliable service to its customers. There continues to be a real need for business practice variation amongst NGDCs and much caution should be taken around attempts to force standardization across NGDCs.

IV. Conclusion

Columbia believes the prudent and reasonable next action is to implement consumer education and further monitor the impact of the latest changes brought about by the NGDC Promotion of Competitive Markets rulemaking in Docket No. L-2008-2069114, and the changes that will result from pending legislation (HB 1188), if implemented, before making further changes statewide.

Columbia's transportation programs are alive and thriving with numerous suppliers, many shopping customers, and the majority of gas supply (75.4%[4]) provided by NGSs. As evidenced by the extensive history of the Choice program, Columbia's customers have borne the cost of the implementation of transportation programs as well as the costs for program revisions, maintenance, programming, education, and administration for more than 10 years. Columbia urges the Commission to carefully consider the next steps in this proceeding keeping in mind the ultimate financial impact on Columbia's customers.

[4] Based on Columbia's switching statistics as of 10/31/2013 and reported to the Pennsylvania Public Utility Commission.

Respectfully submitted,
COLUMBIA GAS OF PENNSYLVANIA, INC.

By: ______________________
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Its Attorney

Dated: December 12, 2013

Attachment A

Monthly PAGasSwitch Update

CUSTOMERS SWITCHING TO A NATURAL GAS SUPPLIER

NOVEMBER 2013***

Natural Gas Utility	Total Switching Customers			Residential Switching Customers			Commercial Switching Customers			Industrial Switching Customers		
	#	%	% of Load	#	%	% of Load	#	%	% of Load	#	%	% of Load
Columbia Gas of PA	115,736	27.9	79.8	105,021	27.9	29.7	10,503	26.9	73.5	212	43.5	99.4
Equitable Gas	18,510	7.2	76.9	15,013	6.3	6.5	3,400	19.4	81.5	97	70.8	99.9
National Fuel Gas	33,812	16.0	78.9	28,596	14.6	16.5	4,815	31.6	77.6	401	62.9	99.1
PECO	60,918	12.3	70.2	52,047	11.5	11.2	7,965	19.3	37.6	906	100	100
Peoples Natural Gas	89,662	25.0	76.0	81,492	25.0	24.0	8,007	29.0	76.0	163	81.0	99.0
Peoples TWP	66	0	84.0	0	0	0	51	1.0	42.0	15	79.0	98.0
Philadelphia Gas Works	3,311	.7	59.8	0	0	0	3,161	12.4	49.9	150	20.7	98.8
UGI	46,289	13.0	92.7	34,980	11.0	12.1	10,521	30.2	79.7	788	57.4	99.9
UGI Central Penn Gas	1,712	2.2	81.9	134	.2	.1	1,419	13.8	69.2	159	53.4	98.8
UGI Penn Natural Gas	4,909	3.0	88.2	815	.6	.7	3,942	24.8	75.1	152	70.0	99.9
Valley Energy	46	.7	89.9	0	0	0	26	3.3	11.4	20	69.0	96.3
Statewide Total	374,971	13.0*	81.8**	318,098	12.0	12.4	53,810	23.2	67.2	3,063	61.3	99.5

(Approximately 2,643,000 Residential + 232,000 Commercial + 5,000 Industrial = 2,880,000 Total Customers)

* Percentage based on the total number of customers of natural gas distribution utilities subject to Chapter 22, Natural Gas Competition, of the Public Utility Code, 66 Pa. C.S. §§2201 – 2212.

** Percentage represents alternative supplier load (volume of gas in MCF) billed during the reporting month, compared to the total load of the gas company.

*** In order to include information regarding the number of customers who have switched during the reporting month together with the percentage of load (volume of gas in Mcf) delivered by alternative suppliers, it is necessary to compile actual usage information based on monthly customer meter readings and billing processes. Complete usage data is not immediately available with the settlement process ranging from 30 to 60 days.

PENNSYLVANIA PUC
PUBLIC UTILITY COMMISSION

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