

Philadelphia Gas Works

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February 2, 2015

VIA E-FILING

Rosemary Chiavetta - Secretary
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: **Philadelphia Gas Works' Comments to the December 18, 2014 Final Order - Investigation of Pennsylvania's Retail Natural Gas Supply Market – RE: ACCOUNT NUMBER ACCESS MECHANISMS; Docket No. I-2013-2381742**

Dear Secretary Chiavetta:

Enclosed for filing are Philadelphia Gas Works' Comments to the above-referenced Final Order re: Account Number Access Mechanisms.

If you have any questions, please contact me.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Gregory J. Stunder", is written over the typed name. The signature is fluid and cursive, with the first and last names being most prominent.

Gregory J. Stunder

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation of Pennsylvania’s Retail :
Natural Gas Supply Market – :
RE: NGDC Customer Account Number : I-2013-2381742
Access Mechanism :

**COMMENTS OF PHILADELPHIA GAS WORKS ON THE DECEMBER 18, 2014
FINAL ORDER – RE: ACCOUNT NUMBER ACCESS MECHANISMS**

I. INTRODUCTION

In the Pennsylvania Public Utility Commission’s (“Commission” or “PUC”) Final Order issued on December 18, 2014 in this matter, the Commission requested comments with respect to Account Number Access Mechanisms. PGW concurs with the comments filed by the Energy Association of Pennsylvania (“EAP”) and highlights some issues in the following comments.

II. COMMENTS

A. Stakeholder Process for Account Number Access

While the issue of supplier account number access was addressed within the Electric Retail Market Investigation, Natural Gas Distribution Company’s (“NGDC”) have not had an opportunity to fully analyze the proposal’s impact on their businesses. PGW echoes EAP’s recommendation for a stakeholder input process to fully explore the issue within the NGDC context.

As part of gathering stakeholder input, PGW proposes that the stakeholder process could benefit from lessons learned by the Electric Distribution Companies (“EDC”) and Electric Generation Suppliers (“EGS”) with respect to usage of the account number access mechanisms, including the cost effectiveness of those programs, before proceeding within this NGDC proceeding. This examination would assist in determining whether such mechanisms are a prudent use of ratepayer funds. Furthermore, with respect to the data security and customer privacy concerns that have been acknowledged by a number of parties, it similarly seems worthwhile to analyze the EDC and EGS experiences with such mechanisms to identify and resolve potential gaps. The results of the EDC experience may not have yet had sufficient time to develop. However, this relevant data source will soon be available and justifies a thorough examination to ensure customer value and privacy and to identify potential improvements prior to imposition on NGDCs. Additionally, this stakeholder process is vital to responding to the questions posed in the December 18, 2014 Final Order.¹

B. Cost recovery

The potential NGDC account number access mechanisms may benefit both Natural Gas Suppliers and shopping customers by allowing them to more easily obtain confidential customer data. Nonetheless, fair and equitable cost recovery for all expenses incurred in developing and

¹ The Commission set forth the following questions on pages 46-47 of the December 18, 2014 Final Order:

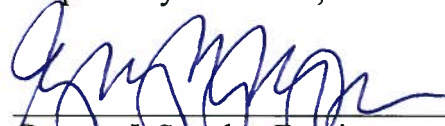
- The technological platform to be used. EDCs were directed to develop web-based portals. Is the same appropriate for the natural gas industry or are their alternatives we should consider?
- What security mechanisms should be utilized to protect consumer privacy? This includes the possible use of password-protections, and minimum customer information requirements for using the mechanism (customer’s full name, service street address and five-digit postal code, etc.). The use of customer photo identification and a letters of authorization should also be addressed.
- Should the mechanisms only be available at public locations, not consumer homes or businesses? And if so, how should this be documented?
- What capabilities should be required of the mechanism to track the usage of the system and identification of users? What should be the record retention requirement for this information - three years as in the electric industry?

implementing access mechanisms should be assured through this proceeding. Further certainty on cost recovery and the source(s) of such recovery is necessary and should also be addressed within the context of any stakeholder process.

III. CONCLUSION

PGW appreciates the opportunity to provide these comments about Account Number Access Mechanisms and the Company looks forward to continue working with the Commission and other stakeholders on this critical issue.

Respectfully Submitted,



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Date: February 2, 2015