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February 2, 2015

VIA E-FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
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 please find the comments of the UGI Distribution Companies, comprised for purposes of this filing of UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc. These comments are being submitted in accordance with paragraph 6 of the Commission's Final Order at the above docket entered on December 18, 2014, and published in the January 3, 2015 edition of the *Pennsylvania Bulletin*, seeking comments addressing account number access mechanisms.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark C. Morrow".

Mark C. Morrow

Counsel for the UGI Distribution Companies

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation of Pennsylvania's Retail Natural Gas Supply Market : Docket No. I-2013-2381742
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**COMMENTS OF THE
UGI DISTRIBUTION COMPANIES**

The UGI Distribution Companies ("UGI"), comprised for purposes of this filing of UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc., appreciate this opportunity to submit comments in response to the Commission's Final Order ("Final Order") at the above docket entered on December 28, 2014, and published in the January 3, 2015 edition of the *Pennsylvania Bulletin*, seeking comments concerning account number access mechanisms. These comments are meant to supplement the comments to be filed by the Energy Association of Pennsylvania at this docket, which UGI fully supports.

I. INTRODUCTION

As the Final Order notes, in *Final Order on EDC Customer Account Number Access Mechanism for EGSs* – Docket No. M-2013-2355751 (Order entered July 17, 2013) (ERMI Account Number Order"), the Commission

directed EDCs to develop secure internet portals that suppliers could access to obtain account numbers. The portals are intended to facilitate supplier marketing in public places (e.g., malls, community events, fairs, etc.) where consumers are unlikely to have their utility bill or their account number. EDCs were directed to develop portals with a variety of security features. The portals are password-protected, secure websites that require a supplier to submit the customer's full name, service street address and five-

digit postal code. The mechanisms also document the supplier's attestation that the supplier is enrolling the customer in a public location and has obtained photo identification and a signed letter of authorization from the customer. The mechanism also tracks the usage of the system and identifies who accessed what data and when. This information has to be retained for three years and maintained in a fashion which can be easily provided to the Commission upon its request.

Final order, p. 43.¹

The Final Order now proposes to extend a similar requirement to NGDCs and to make this a priority item noting:

We think this is an important, immediate concern because we want consumers to be able to shop for natural gas service at public locations like malls and community events the same as they may shop for many other goods and services. We want energy shopping to be as common, easy and ubiquitous as shopping for wireless phone service. But to make this happen, suppliers need access to consumer account numbers. The simple fact is, as RESA points out, that consumers do not walk around in public with their utility account number, nor do they memorize their account number like they memorize their wireless phone number. Again, our hope is that by facilitating more marketing in public areas – where it is the consumer that decides when and how to engage with a supplier - suppliers will rely less on marketing methods that consumers may find more intrusive. To make this vision a reality, there must be some sort of mechanism suppliers can use to access consumer account numbers when necessary.

¹ UGI Utilities, Inc. – Electric Division filed a compliance plan and cost recovery mechanism consistent with the ERMI Account Number Order, which was approved by the Commission in an Order entered on May 23, 2014 at Docket No. M-2013-2355751. Consistent with the terms of the Commission's May 23, 2014 Order, UGI-ED implemented its access mechanism on or before December 31, 2014.

Final Order, pp. 44-45.

II. COMMENTS

UGI believes that the access to account numbers should be provided through a password-protected web portal which it would propose to implement in as close a fashion as possible to the compliance plan the Commission approved for UGI Utilities, Inc. – Electric Division. Specifically, account numbers would only be provided to individuals identified by a natural gas supplier (“NGS”) who would receive a user name and password to log onto a dedicated website. Authorized persons could access the site as often as necessary; UGI would be able to track access; and UGI would retain records of site access for three years. UGI would expect NGS’s to inform them of personnel changes and would terminate access to persons consistent with instructions from a NGS. NGS’s should also be required to obtain and document customer consent to the release of account number information in the same manner as the Commission established for EGSs. The Commission should similarly emphasize in its order the consequences for NGSs from violating customer confidentiality.

UGI also believes that the Commission, consistent with its treatment of electric distribution companies, should authorize NGDCs to recover their costs of compliance on a full and timely basis through the submission of proposed cost recovery mechanisms along with their compliance plans, and would encourage the Commission to permit a period of at least six months for implementation of the access process.

III. CONCLUSION

UGI looks forward towards working with the Commission to implement a remote customer account number access mechanism for NGSs in a timely manner.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark C. Morrow", with a long horizontal flourish extending to the right.

Mark C. Morrow

Counsel for the UGI Distribution Companies