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Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

RE: Investigation of Pennsylvania's Retail Natural Gas Supply Market –  
NGDC Customer Account Number Access Mechanism  
Docket No. I-2013-2381742

Dear Secretary Chiavetta:

By Order entered on December 18, 2014, the Pennsylvania Public Utility Commission ("Commission") initiated an investigation of Pennsylvania's retail natural gas supply market, *Investigation of Pennsylvania's Retail Natural Gas Supply Market*, Docket No. I-2013-2381742 ("*Gas RMI Order*"). The *Gas RMI Order* identifies a number of action items to be addressed during the course of the Commission's investigation. One of the action items identified as a priority by the Commission was to require natural gas distribution companies ("NGDCs") to develop and implement mechanisms to allow natural gas suppliers ("NGSs") to access account numbers for customers who have elected to not include their account information in the Eligible Customer List.

Through this letter, Columbia Gas of Pennsylvania, Inc. ("Columbia") states its support for the comments submitted by the Energy Association of Pennsylvania ("EAP"). In particular, Columbia supports the following comments of the EAP:

- The account number mechanisms approved by the Commission for some of Pennsylvania's electric distribution companies ("EDCs") just recently became operational. Columbia recommends that the Commission evaluate the operation of the EDC's mechanisms and the use of these mechanisms by suppliers, prior to requiring NGDCs and their customer to incur the expense of developing and implementing these mechanisms; and

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- If the Commission determines that these mechanisms are cost effective, Columbia requests that NGDCs be provided with sufficient time to develop these mechanisms for use on their systems and that the Commission provide for full cost recovery of the costs associated with the development and implementation of these mechanisms.

In its comments, the EAP did not address the issue of the appropriate technological platform for NGDCs to provide NGSs with access to customer account numbers. Columbia requests that the Commission provide each NGDC with the latitude to choose the most appropriate platform for use on its system including, if consistent with Commission requirements, currently existing mechanisms.

Columbia appreciates the opportunity to comment on this issue and looks forward to working with the Commission and interested stakeholders on this matter. Thank you.

Respectfully submitted,



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