

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Investigation of Pennsylvania’s)
Retail Natural Gas Supply Market)**

Docket No. I-2013-2381742

**Comments of the
National Energy Marketers Association**

The National Energy Marketers Association (NEM)¹ hereby submits comments in support of the utilities implementation of an account number access mechanism that would allow suppliers to obtain customer account numbers from the utility to facilitate the enrollment of customers. These comments are submitted pursuant to the Commission’s Final Order issued in the instant case on December 18, 2014 and subsequently published in the Pennsylvania Bulletin on January 3, 2015. NEM recommends that the utilities implement a web-based portal through which suppliers can obtain pre-authorized access to customer account numbers to facilitate expeditious enrollments. This can be accomplished in a manner that ensures consumer protection and privacy.

As noted in our previously filed comments in support of the implementation of an account access mechanism by the electric utilities, competitive suppliers are significantly restricted from marketing to and aggregating customers in a meaningful way, and achieving economies of scale in enrollment, because of the requirement that suppliers obtain the customer account number directly from the customer. Customers generally do not know their utility account number and often find it difficult to locate a utility bill in a timely manner when discussing service options with a competitive supplier.

¹ The National Energy Marketers Association (NEM) is a non-profit trade association representing both leading suppliers and major consumers of natural gas and electricity as well as energy-related products, services, information and advanced technologies throughout the United States, Canada and the European Union. NEM’s membership includes independent power producers, suppliers of distributed generation, energy brokers, power traders, global commodity exchanges and clearing solutions, demand side and load management firms, direct marketing organizations, billing, back office, customer service and related information technology providers. NEM members also include inventors, patent holders, systems integrators, and developers of advanced metering, solar, fuel cell, lighting and power line technologies.

Unlike a telephone number, a consumer does not memorize their utility account number. Additionally, once a consumer pays their utility bill, they frequently discard it, and so they no longer have documentation of the utility account number. This can often lead to a difficult and frustrating attempt to try and exercise their right to shop. It also needlessly drives up the cost of customer acquisition. If Pennsylvania customers are to be able to truly participate in retail choice, then competitive supplier offerings must become as ubiquitous as telecom offerings and available in locations as convenient as “energy fairs” and/or local shopping malls. A web-based supplier portal that permits real-time access to the account number will do much to ameliorate these problems.

The Commission addressed potential concerns of consumer privacy and potential slamming in the design of the electric utility account number access mechanism. This included requiring the supplier to obtain the customer’s prior authorization before looking up the account number, establishment of minimum customer information requirements for validation (customer’s full name, service street address, and five digit postal code), requiring the use of the customer’s photo identification and a letter of authorization that the supplier retains. In addition, a clear chain of accountability on the part of the supplier and its representatives that utilize the system is established through the use of a passcode-protected web-based portal.

Establishing the same account number access mechanism for natural gas customers as has been required of the electric utilities will ensure that consumers are adequately protected. It will also facilitate the enrollment of dual commodity customers that would then be provided with the same level of convenience for energy shopping for both natural gas and electricity.

NEM recommends that the account number access mechanism be permitted for all sales channels, not only in public venues. A consumer’s ability to locate his or her account number is limited notwithstanding if the consumer is exploring energy choice at a street fair, mall, telephone exchange,

internet inquiry or door-to-door sales call. Simply stated, the account number is not memorable. Consumers simply do not have their utility account numbers memorized, nor do they keep it readily accessible. Incorporating the same consumer protection and privacy measures as were required in the electric utility mechanism should adequately address any concerns in this regard. Accordingly, NEM recommends that the account number access mechanism should appropriately be permitted for all customer enrollment transactions and venues.

Conclusion

NEM appreciates this opportunity to provide the Commission with its comments in support of the implementation of a web-based account number access mechanism that would allow suppliers to obtain customer account numbers from the utility.

Sincerely,

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