

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Natural Gas Distribution Company :
Customer Account Number Access : M-2015-2468991
Mechanism for Natural Gas Suppliers :

**COMMENTS OF NATIONAL FUEL GAS DISTRIBUTION CORPORATION
TO TENTATIVE ORDER – ACCOUNT NUMBER ACCESS MECHANISM**

I. INTRODUCTION

In its December 18, 2014 Final Order relating to the retail natural gas supply market investigation (the “Final Order”), the Pennsylvania Public Utility Commission (“PUC”) determined the development of an account number access mechanism by natural gas distribution companies (“NGDCs”) is a priority item. (Final Order, Dkt. No. I-2013-2831742, p. 44.) The Final Order requested interested parties to provide comments on the account number access mechanism issue, emphasizing several topic areas related to preferences and capabilities, security measures, availability of the suggested mechanism, tracking and identifying users, and record retention associated with providing the customer’s account number to natural gas suppliers’ (“NGS”) when the account number is otherwise unavailable from either the customer or the Eligible Customer List (“ECL”). Many parties filed comments in response.

On April 9, 2015, the Commission released a Tentative Order, Docket No. M-2015-2468991, to determine the necessary procedures for developing and implementing a natural gas account number access mechanism. National Fuel Gas Distribution Corporation (“National Fuel”) supports the comments of the Energy Association of Pennsylvania (the “EAP”) filed, or to

be filed, in response to the Tentative Order. National Fuel separately submits these comments in order to supplement the EAP's comments.

II. COMMENTS

Currently, National Fuel anticipates having an Account Number Access Mechanism ("Mechanism") built to the specifications of the Tentative Order available by August 31, 2016. However, National Fuel is in the process of installing a new billing system and may need to delay the Account Number Access Mechanism availability date depending on a wide variety of factors associated with the implementation of that billing system. National Fuel further estimates the costs of the Mechanism to be just under \$50,000.

In evaluating the Mechanism, National Fuel analyzed potential built in controls that would limit access to fixed, pre-registered locations in an effort to prevent access in the context of door-to-door marketing. Generally however, National Fuel discovered such controls would add substantial cost to the Mechanism. Moreover, these controls could create a more difficult Mechanism for NGSs and could likely be circumvented by a motivated party anyhow.

National Fuel is also concerned that while its estimated costs are relatively modest, the Mechanism will be underutilized. Currently, only one to two NGSs access National Fuel's ECL each month. National Fuel believes daily updates, rather than the current monthly process, would provide more updated information faster and in a more cost effective manner. Even National Fuel's \$50,000 estimate is substantial if the Mechanism is not used.

National Fuel recognizes the PUC's desire to address a lack of participation in the competitive natural gas supply market in Pennsylvania. While residential customers may not participate in the market at desired rates, National Fuel notes that non-residential customers in its service territory have been participating in the competitive market at high rates since the 1980s.

Such non-residential customers likely do not make energy shopping decisions in the same public venues as residential customers. Accordingly, National Fuel believes that non-residential customers with consumption in excess of 1000 Mcf per year should be appropriately excluded from the Mechanism. Exclusion of such non-residential customers would further aid in the prevention of improper access of sensitive customer information.

II. CONCLUSION

National Fuel respectfully requests that the Commission consider these comments and EAP's separately filed comments in the Final Order in this proceeding.

Respectfully submitted,

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