



NRG Retail Northeast
3711 Market Street
Philadelphia, PA 19104

May 26, 2015

FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**RE: Natural Gas Distribution Company Customer Account Number
Access Mechanism for Natural Gas Suppliers; Docket No. M-
2015-2468991; Comments of NRG Retail Affiliates**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission on behalf of NRG Retail Affiliates is an electronic copy of its Comments in the above-referenced proceeding.¹

If you have any questions regarding this filing, please direct them to me at 301.509.1508 or via email at lgibbons@nrg.com.

Sincerely,

Leah Gibbons
Director, Regulatory Affairs

Electronic CC:

Office of Competitive Market Oversight at ra-OCMO@state.pa.us

¹ NRG Retail Affiliates include Reliant Energy Northeast LLC d/b/a NRG Home, Green Mountain Energy Company and Energy Plus Holdings LLC.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Natural Gas Distribution Company	:	
Customer Account Number Access	:	Docket No. M-2015-2468991
Mechanism for Natural Gas Suppliers	:	

**COMMENTS OF NRG RETAIL AFFILIATES
TENTATIVE ORDER**

Date: May 26, 2015

Tentative Order NRG Retail Affiliates Comments

The NRG Retail Affiliates (“NRG Retail”) respectfully submit these Comments in response to the Pennsylvania Public Utility Commission (Commission) Tentative Order of April 9, 2015 regarding the recommendation from the Commission’s Office of Competitive Market Oversight (OCMO) for the development of procedures to facilitate Natural Gas Suppliers (NGS) access to the Natural Gas Distribution Company (NGDC) customer account numbers for completion of enrollment requests in instances where the customer account number is not available from either the customer or from the Eligible Customer List (ECL).²

The NRG Retail companies – NRG Home, Green Mountain Energy Company, and Energy Plus Holdings LLC – are all licensed by the Commission to serve retail electricity customers across the Commonwealth, and are all wholly-owned subsidiaries of NRG Energy, Inc., a Fortune 250 Company. In addition, NRG Home currently has a natural gas supplier license pending before the Commission.³ NRG is one of the country’s largest power generation and retail electricity supply businesses. NRG owns and operates more than 50,000 MW of generating capacity, including approximately 14,000 megawatts located in Pennsylvania. The company’s retail businesses serve almost 3 million customers across 16 states. The NRG companies employ more than 1,700 people in Pennsylvania and NRG Retail’s northeast business is headquartered in Philadelphia.

In its Tentative Order issued April 9, 2015, the Commission proposes that the NGDCs develop a passcode-protected secure website portal that will provide NGSs with access to customer account numbers for all NGDC rate classes for those accounts that are not available on the NGDC’s ECL. The tool would be available only for customer-initiated enrollment transactions at locations where the customer does not readily have access to his or her account number (e.g., a shopping mall, farmers market, or other public events).

The Commission declined to require the NGDCs to enable the use of “wildcards” and/or drop-down boxes for various customer information inputs

² *Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers*, Tentative Order, Docket No. M-2015-2468991, April 9, 2015.

³ Docket No. A-2015-2478293

in natural gas account number access mechanisms, though it did encourage the use of those options where possible.

As the Commission is well aware from the comments filed by NRG Retail in the Commission's EDC Customer Account Number Look-Up Mechanism docket,⁴ NRG Retail is a strong advocate for making it easy and convenient for customers to shop for energy services at mainstream locations, just like they do for other goods or services. Adoption by the utilities of mechanisms designed to provide access to prospective customer account numbers to facilitate enrollments at public venues is essential to providing customers the ability to exercise their right to purchase energy services wherever and whenever they choose. The NRG Retail companies actively market to customers at a variety of public venues including farmers markets, town festivals, retail shopping centers and other public locations, all of which are places at which customers do not have access to their utility account number which is needed to complete an enrollment for electricity and natural gas supply service with an EGS/NGS. Without the account number a customer's order for electricity or natural gas supply service either cannot be processed by the EDC or the enrollment is delayed while attempts are made post-sale to contact the customer and obtain an account number.

In its Tentative Order, the Commission reiterated its goal to ensure that "energy shopping is as common, easy and accessible as shopping for wireless phone service."⁵ NRG Retail shares this goal. Shopping for a retail energy provider should not be more challenging than setting up service with a local electric or natural gas utility company, or for that matter, other consumer transactions for home services such as wireless phone, cable television and Internet service.

Supplier marketing activity at public places increases the visibility of retail competition and makes the concept of shopping for an electricity supplier more mainstream – something the Commission has endeavored to do. The Commission created a robust PAPower Switch website for customers and has sponsored public shopping events around the Commonwealth. The Commission has ordered and supported numerous customer education communications to assure Pennsylvanians that shopping for energy suppliers is easy and convenient.

⁴ *EDC Customer Account Number Access Mechanism for EGSs*, NRG Retail Affiliates Comments, Docket No. M-2013-2355751, May 21, 2013.

⁵ *Ibid* at 2.

These efforts to promote the virtues of energy shopping become hollow when a customer must go through additional steps and too often experience significant inconvenience only because they did not have their utility account number when they were at the mall, the farmer's market, the festival in their town. Establishing a process for NGSs to obtain account numbers on behalf of customers in order to complete their service requests is a step toward a better functioning market and, most important, a better shopping experience for customers.

NRG Retail supports the Commission's proposal to require the NGDCs to implement account number look up tools similar to what has been implemented by the EDCs for use when marketing to natural gas customers at public venues. Making the enrollment process easy for consumers is critical to ensuring a positive customer experience with shopping for their retail energy needs. And it is the customer experience that is paramount. Customers have an expectation of being able to get what they want when they want it and without undue hassle. It is the obligation of the Commission, EGSs and NGSs and all of the utilities to meet those customer expectations.

Arguably, signing up a customer for electricity or natural gas service is a credibility test for EGSs and NGSs. If a supplier cannot do that without inconveniencing the customer, the chances that the customer will be willing to take a chance with that supplier on other, often more complicated products, like rooftop solar or a home energy management product are significantly reduced, if not eliminated altogether. Getting the account number look-up tool right so the energy supply enrollment is quick and easy could very well be a gating item to the sale of all the value-added services and products the Commission is so interested in seeing delivered to Pennsylvania's electricity and natural gas customers.

NRG Retail has extensive experience utilizing the account number look-up tools implemented by PECO, and to a lesser extent by the other EDCs.⁶ Through these comments, NRG Retail shares its "real world" experience with the efficacy of these tools and offers suggestions for useful mechanisms to be implemented by the NGDCs, as well as toward improving the existing EDC account number look-up tools.

⁶ None of the NRG Retail companies has obtained log in credentials to the Duquesne Light (DQL) account number look-up tool. DQL requires EGSs to enter into an agreement with DQL. NRG Retail submitted the required agreement for one of its affiliates, and is still waiting to receive log in credentials in order to begin using the tool.

Based on NRG Retail's experience working with the EDC account number look-up tools, we recommend that the Commission:

1. Require the NGDCs to make their customer databases searchable via an on-line search tool, such as those currently implemented by the EDCs, to provide access to prospective customer account numbers to facilitate enrollments at public venues;
2. Direct the EDCs/NGDCs to clean up their customer databases to remove extraneous information, extra spaces, irregular characters, misspellings, etc., and to standardize their data to allow EGSs and NGSs to more easily and successfully search those data bases;
3. Require the EDCs, to the extent they are not already doing so, to enable wildcard searches in order to facilitate higher success rates when using the on-line account number look up tools;
4. Require the NGDCs to implement search tools that allow for wildcard matching, allow for a multiple-account text file upload searches, and return results that confirm the customer name and address information and provides the customer's account number, regardless of whether the customer is on the ECL;
5. Require the NGDCs and EDCs to update and post their ECLs/customer databases on a more frequent basis to allow customers who have recently moved to successfully enroll with their chosen supplier;
6. Require First Energy to modify its web portal attestations and photo identification requirements in order to comply with the Commission's Final Order in Docket No. M-2013-2355751;
7. Clarify that both the EDC and NGDC web portals must simply allow for an EGS or NGS to attest *that the customer provided a photo ID* and not require an indication of the form of photo ID.

Meet Customer Shopping Expectations by Ensuring that Useful and Efficient Customer Account Number Look-Up Tools ("LUTs") are implemented by the NGDCs

The usefulness of any customer account number look-up tool ("LUT") is dependent on 1) the quality of data that the tool will search, 2) the relative ease of use for users of the search tool, and 3) data updates that occur on a reliable, predictable schedule. Poor data quality that yields low success rates, and an LUT that is not easy to use or is not updated on a predictable schedule significantly diminishes the value of the search tool and results in low usage by suppliers of the LUTs. In contrast, high quality data that is fast

and easy to search and provides a high success rate is invaluable to EGSs/NGSs and enables them to not only focus their sales and marketing efforts on reaching customers at public venues – and spend less effort trying to reach customers at home – but also to meet the expectations of customers who have consented to enroll with them. NRG Retail urges the Commission to direct the NGDCs to focus on these three goals as they move forward with building their LUTs.

Data Quality is Critical to Successful Account Number Searches

NRG Retail has the most experience working with the PECO LUT and its comments about the efficacy of the current tools are based on that experience. Given that PECO is both an EDC and an NGDC, a close examination of PECO's LUT is both relevant and appropriate.

In its Tentative Order, the Commission noted that:

“PECO notes that it launched its electric account number access tool on May 15, 2014, and that, as of January 25, 2015, it has received 5,873 requests overall from five EGSs. Of those requests, 743 matched information in PECO's billing system, 465 of which were already included on PECO's ECL. PECO notes that, as a result, only 278 of the 5,873 requests yielded successful results. PECO also notes that its electric portal cost \$215,632. PECO, therefore, suggests that OCMO weigh the costs versus the benefits of such a tool before requiring its implementation in the natural gas marketplace. PECO Comments at 3.” Tentative Order at 5.

The Tentative Order further notes that:

“As of March 22, 2015, PECO had received 35,301 requests to the mechanism from those five EGSs. PECO notes that EGSs have the ability to upload a single file with a maximum of 500 individual requests. Of the 1,767 precise matches located using PECO's account number access mechanism,

927 were already available on the ECL." Tentative Order at 9.

The PECO LUT process allows a user to upload files and search for up to 500 customer accounts at one time and provides a response to that query very quickly. However, the tool requires a **100% character-for-character match** (including spacing) on Name, (or Secondary Name if used), Address 1, Address 2 and 5-digit zip code. PECO's LUT does not support wildcard searches.

By PECO's own account, as of March 22, 2015, the success rate for suppliers searching for customer account numbers is very low – just 5% of the searches returned a result of either a match or "on ECL".⁷

NRG Retail has spent a significant amount of time analyzing PECO's ECL, a subset of the entire customer database that the LUT searches, to become educated not only to improve the success rate of our searches of the ECL (the first step in looking for a customer's account number), but also to enable us to submit searches that are more likely to return successful results using the LUT.⁸

NRG Retail's searches of PECO's ECL results in successfully finding a customer's account number just 62% of the time on average, and those are searches that occur in the presence of the customer who can provide feedback on the possible variations of his or her name and/or address for us to search. Results increase slightly (4%) when an NRG Retail sales analyst conducts an additional search of the ECL back at the office. Table 1 provides a summary of the comparative success rates searching the ECLs of the other EDCs.

⁷ Accounting for the fact that a result of "ON ECL" does not actually provide the customer's account number in the search result file the EGS receives – an EGS must go back to the ECL to search again – a more accurate success rate for returned account number is an even lower (and more astonishing) 2%.

⁸ After several months of minimally successful searches of the PECO LUT, NRG Retail reached out to PECO in September 2014 to discuss concerns it had using PECO's LUT and to seek improvements that would produce a higher success rate. The conversations did not result in any improvements to the efficacy of the LUT.

Table 1: Summary of NRG Retail’s Average Success Rate For EDC Eligible Customer List (“ECL”) Searches

EDC	Average Success Rate of ECL Search (Jan – April 2015)
PECO	62%
PPL	85%
Duquesne Light	71%
MetEd	80%
West Penn Power	72%

Note: NRG Retail does not have enough experience searching the Penelec or Penn Power ECLs to provide a data point for these entities.

Our work to become more proficient at using PECO’s LUT throughout the first four months of 2015 has resulted in an average success rate of 28% (up from a meager 5% when we first started using the tool in 2014), meaning our searches provide customer account numbers just 28% of the time. While 28% is better than 5%, this is still a shockingly low success rate.⁹ When taken together, the success rate of NRG Retail’s searches of both the PECO ECL and the LUT, on average, NRG Retail successfully obtains the account number for a PECO customer just 76% of the time.¹⁰ Most importantly, this low success rate means that we are not meeting customer expectations to enroll them for electricity service, resulting in a very poor customer experience.

The very low success rate with searching PECO’s LUT is due to the poor quality of the data being searched coupled with strict requirements for 100% character-for-character exact matches across four separate data fields. To make matters worse, the search results that are returned to the user do not indicate which of the data fields have errors and which do not, so a supplier is left to try to guess which fields must be modified when resubmitting the search.

NRG Retail has determined that *at most*, just over half (56%) of PECO’s customer list has good data quality across all of the data fields required by

⁹ Arguably, neither customers nor EGSs are realizing the full value of their \$215,632 investment in PECO’s account number look-up tool. Customers and EGSs split the cost of this tool 50/50, with all EGSs paying via an increase in the POR discount rate and customers paying via an additional charge on their bill.

¹⁰ Almost a quarter of the customers seeking to enroll with NRG Retail at a public event cannot be enrolled without additional follow-up and outreach to the customer to obtain his or her account number for a transaction the customer believes was already completed at the point of sale. As NRG Retail conveyed in its comments during the EDC account number look-up docket, the additional outreach to the customer discourages customer participation, diminishes the credibility of the EGS with the customer, increases costs to NRG Retail, and creates a barrier to efficient enrollment of customers – impeding customer choice. The delay may also result in a lost savings opportunity or commencement of value-added services for customers which, in turn, results in customer frustration and disappointment, and a less-than-favorable opinion of the competitive retail market.

PECO to match a customer account number. Roughly half of PECO's customer database suffers from problems that significantly limit NRG Retail's ability to successfully find a customer's account number, including:

1. Name fields that include either a first or middle initial, often with irregular spacing and/or punctuation;
2. Name fields that include a prefix or suffix or some combination (Sr, Jr, III, Dr, Rev, Mr, Mr&Mrs, Mr & Mrs, Mr., etc.), with and without punctuation and often with irregular spacing;
3. Address fields that are not U.S. Postal Service compliant (i.e., no house or street number, address 1 & 2 fields are reversed);
4. Address fields that include property lot numbers (Lot 53) or house descriptions (i.e., "colonial" or "farmhouse"), or invalid zip codes, etc.;¹¹
5. Address fields with numerous derivations of street style (Ave, Rd, St, Ln, Cir, etc.) or apartment designations;
6. Name and address fields with highly non-standard formatting (i.e., misspellings, ampersands, spaces after hyphens, random apostrophes, zeroes in place of the letter "o", commas in the middle of a name, etc.)
 - a. For example: if a customer's last name is Jones, PECO's database may have it spelled as J0nes (using a zero), and there would be no match.
 - b. For example: PECO allows searches for two customer names using the Name field, and the Secondary Name field. A search must be matched, character-for-character in either field. NRG Retail sometimes finds two names in the Name field, which means that even if we correctly enter one of the names, the search result returns "NO HIT" because both names were not included in Name field. Alternatively, if we include the secondary name in the Name field, the search result may still return a "NO HIT" result because there may be an ampersand, with or without a space after the first name, or one or both of the names may be preceded by a prefix or suffix.

¹¹ NRG Retail identified 130 zip codes in PECO's February 2015 ECL that are ineligible for service because: they were in Delaware; do not exist according to the U.S.P.S; they were not associated with a physical serviceable address (i.e., for PO Boxes). In addition, while the inclusion of a property lot number may be U.S.P.S. compliant, customers typically do not know the lot number of their property and they certainly do not use it when providing their address. There is no way for any supplier to know this information and requiring a 100% match on it is unreasonable.

To reiterate, PECO requires a 100% character-for-character exact match – across four data fields – of data that is polluted with random or extraneous information, misspelled names, zeros where there should be “Os”, spacing irregularities, reversed addresses, etc., in order to obtain a customer’s account number and submit an enrollment.¹² With so many abnormalities with the underlying data, achieving an exact match to find a customer in PECO’s LUT is nearly impossible. And as PECO’s own numbers show, absent significant effort by an EGS, an EGS only is able to successfully locate customer account numbers (and thereby meet the customer’s expectation to enroll for electricity service) using the LUT just 5% of the time!¹³

NRG Retail has produced a series of Confidential Attachments that it believes would significantly improve the Commission’s understanding of the problems EGSs are experiencing with the PECO LUT. The Attachments include screenshots of PECO’s ECL illustrating the abnormalities described above, and provide an example of the process employed by NRG Retail to find a single customer account using the PECO LUT. However, because NRG Retail believes providing these exhibits to the Commission may violate the confidentiality provisions in the supplier coordination agreement between the NRG Retail companies and PECO, these Confidential Attachments are not included with these comments.¹⁴ NRG Retail would not oppose the Commission directing NRG Retail to provide the Commission with these attachments so that it can see for itself the extent of the problems described above.

Based on extensive experience working with the PECO LUT, NRG Retail urges the Commission to direct all of the EDCs/NGDCs, and specifically PECO, to clean up their customer databases to remove extraneous information, extra spaces, irregular characters, misspellings, etc. The utilities should be required to standardize their data to allow EGSs and NGSs to more easily and successfully search those databases to find customer account numbers so that customers’ expectations are met and their experience with shopping

¹² It is ironic that PECO requires 100% character-for-character matching when PECO’s own customer database is not even close to 100% correct/accurate.

¹³ In addition to the efforts of field sales agents, NRG Retail has a corporate sales analyst that spends 10 – 15 minutes on each account search, spending almost half of her time on account number searches across all of the EDCs.

¹⁴ “11. CONFIDENTIALITY OF INFORMATION: 11.1 Generally. All Company information available to an EGS in connection with the provision of coordination services, including, but not limited to, load curve data, and information regarding the Company, computer and communications systems shall not be disclosed to third parties without appropriate authorization and/or consent. 11.2 Customer Information. The EGS shall keep all Customer-specific information supplied by the Company confidential unless and until the EGS has obtained the Customer’s written authorization to do otherwise.” PECO Energy Company, Electric Generation Supplier Coordination Tariff, effective December 15, 2014.

for a competitive retail energy provider is a positive one. This is especially critical for PECO in light of the fact that PECO is also an NGDC, and it is highly likely that the LUT PECO implements for NGSs will suffer from the same problems as the LUT deployed for use by the EGSs.

Moreover, until such time that the EDCs/NGDCs can demonstrate that their databases are 100% accurate (i.e., all customer names and street names spelled correctly and name fields are free of extraneous information/characters, extra spaces, and addresses that are U.S.P.S compliant), no EGS/NGS should be required to obtain a 100% character-for-character match on any search in order to obtain a customer's account number.¹⁵ The EDC/NGDC LUTs should be enabled with wildcard searching to increase the likelihood of successfully finding a customer's account number.

LUT Must be Easy to Use

The EDCs have implemented different tools that are all relatively equal in ease of use, though given the labor intensive effort required to find a single customer account through the PECO LUT, NRG Retail asserts that PECO's LUT is currently less user-friendly.

As previously explained, PECO's LUT allows a user to upload text files and search for up to 500 customer accounts at one time and it provides a response to that query very quickly. In theory, PECO's LUT should be a very efficient solution. However, as explained in great detail above, PECO's LUT requires a 100% character-for-character match across multiple data fields including, Name, Address 1, Address 2, and 5-digit Zip Code, and if used, Secondary Name. Because of the labor intensive effort required to create multiple permutations (sometimes hundreds) of a single customer's information, PECO's LUT ultimately is neither efficient nor easy. NRG Retail's searches in PECO's LUT are *unsuccessful* more than 70% of the time.

In contrast, the PPL and First Energy LUTs limit a user to searching for a single account number at a time. These search tools have significantly less

¹⁵ Neither PPL nor First Energy requires 100% character-for-character matching. Both allow for partial data entry searching and both have implemented wildcard searching, which significantly improves the success rates of searches using their LUTs.

strict matching criteria, and they have built-in wildcard searching which results in significantly higher success rates.

PPL requires only the Customer Name to complete a search and it allows for a partial entry in this field. When searching on Address, PPL's LUT requires the Street Number, Street Name, City and/or Zip Code. In addition, a user has the option to enter additional search criteria including Phone Number, Social Security Number, Email Address, Meter Number, House Number, Directional Prefix (N, S, E, W), Street Name, Street Type (St, Ave, etc.), Directional Suffix, Unit Type (apt, unit, etc.), Unit ID, State, 5-digit Zip Code. Results are returned immediately directly on the website. NRG Retail has only just begun to work with PPL's LUT, and has only searched for a very small number of customer accounts in the tool. However, the company is already experiencing a success rate of 50%.¹⁶

First Energy's LUT requires First Name, Last Name, House Number, Street Name, and 5-digit Zip Code. Each of the required fields must have data entered, and any field except zip code can include a partial entry and will return a result as long as there are not multiple matches. A search resulting in multiple matches returns "Multiple Premise Hits". In addition, Address/Street Name must have a matching direction (N, S, E, W) which can be abbreviated or spelled out. Street Type (St, Rd, Blvd, etc.) is not required. Results are returned immediately on the website. NRG Retail has only just begun to work with First Energy's LUT, and has only searched for a very small number of customer accounts in the tool. However, we are already experiencing a success rate of 80%.¹⁷

NRG Retail urges the Commission to require the NGDCs to build tools that are efficient, easy to use, and include wildcard searching to increase the likelihood of successfully identifying a customer's account number so that NGSs can meet the expectations of customers to enroll them for service as quickly and efficiently as possible. The search mechanisms deployed by the EDCs each include desirable attributes. While it is labor-intensive and produces a wholly unacceptable success rates for the reasons detailed

¹⁶ As noted previously, NRG Retail searches the utility ECL prior to searching the utility LUTs to find a customer's account number. NRG Retail experiences, on average, an 85% success rate searching PPL's Eligible Customer List (ECL). With a 50% success rate searching PPL's LUT, we can anticipate an overall success rate searching for a customer's account number to be just over 92%.

¹⁷ NRG Retail experiences, on average, an 80% success rate searching MetEd's ECL, and a 72% success rate searching West Penn Power's ECL. With an 80% success rate searching the First Energy companies' LUT, we can anticipate an overall success rate searching for a customer's account number to be 96% for MetEd, and 94% for West Penn Power.

above, PECO's LUT does allow for multiple account look-ups through an uploaded text file. In contrast the single account search LUTs implemented by PPL and First Energy, with more flexible matching requirements and automatic wildcard searching work well, require much less effort to search, and have more reasonable success rates. However a user is limited to a single search at a time.

In addition, in terms of the results that are returned, when a search results in a "HIT" and an account number is provided, both the First Energy Companies and PECO return not only the account number, but also a confirmation of the customer's account information (i.e., name, address). In contrast, PPL does not return the customer information, with a result that simply says, "Matching Account Number(s): XXXXXXXXXXXX". Similarly, when a search results in "ON ECL", PECO's LUT simply indicates that the customer is on the ECL, but does not provide the account number. In contrast, PPL and First Energy search results simply provide the account number, regardless of whether the customer is on the ECL, and do not require the EGS to go back to the ECL to search again.

The most efficient solution is a search mechanism that allows for wildcard matching, allows for a multiple-account text file upload search, and returns results that confirm the customer name and address information, and provides the customer's account number, regardless of whether the customer is on the ECL. NRG Retail urges the Commission to require the NGDCs to develop search tools with these attributes.

More Frequent Updates to the Utility ECL/Customer Database on a Reliable Schedule Improves the Ability of Customers Who have Recently Moved to Enroll with their Chosen Supplier

The EDCs have published schedules for when the ECL is supposed to be updated and posted on their secure web portals. As the ECL appears to be a subset of the full utility customer database, NRG Retail believes that the full database is also updated at the same time. NRG Retail has observed that it is not uncommon for an EDC to experience an issue which causes a delay in posting an updated ECL, or the ECL is simply not posted at every scheduled update period.

That said, PPL is the only EDC that schedules updates to its ECL/customer database weekly. The other EDCs all schedule updates to their lists on a monthly basis.¹⁸ NRG Retail urges the Commission to require the EDCs and NGDCs to update and post their ECLs/customer databases weekly, like PPL, so that EGSs/NGSs can find customers who have moved within the last 30-60 days (Roughly 10% of the population moves annually). Weekly updates to the utility ECL/customer database will allow customers who have recently moved to successfully enroll with their chosen supplier.

Customer Identification Requirements Should be Clarified

In its Final Order on *EDC Customer Account Number Access Mechanism for EGSs*, the Commission provided guidance on how EGSs should verify the identity of customers before accessing the utility website portals to search for their account numbers.¹⁹ The Commission said,

“EGS should first verify the identity of the customer before accessing the website portal. This can be accomplished by having the customer produce one government-issued photo identification. If the customer does not have this available, alternative identification or identifications are permitted as long as one of the identifications has a photo of the customer. The EGS does not have to copy the identification nor retain a copy of the identification. However, the form of identification produced should be documented in a field on the web portal and noted on the LOA.”

In its Tentative Order on *Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers*, the commission maintains these requirements with some clarification, and proposes that,

“NGSs require that a customer provide government-issued or alternative photo identification (ID). However, *we do not propose that the NGS be required to copy the ID.* We

¹⁸ The utility scheduled ECL updates are as follows: PPL – every Sunday/Monday; Duquesne Light – every 4th Sunday of the month; PECO – the first Wednesday of the month; First Energy – every 3rd Monday of the month.

¹⁹ *EDC Customer Account Number Access Mechanism for EGSs*, Docket No. M-2013-2355751, entered July 17, 2013, pp.39.

propose that the NGS note the form of ID on the LOA. For example, if a driver's license is presented, the NGS would note the state of issuance **and the driver's license number on the LOA**. Additionally, we propose that the NGDCs include a methodology in the web portal that allows for the NGS to attest that the customer provided a photo ID. An enrollment should not be processed without this attestation."

NRG Retail notes that the Commission did not prescribe to EGSs the precise forms of identification that they may accept, nor did it require the EGS to copy or retain a copy of the customer's identification. The EGS must simply note the form of the identification in a field on the web portal and on the Letter of Authorization ("LOA"). The EDCs have implemented this requirement in various ways, one of which, in NRG Retail's view, does not comply with the Commission's Final Order in Docket M-2013-2355751, and results in interfering with and burdening the enrollment process.

First Energy requires a supplier to indicate via a drop down menu, whether either a "driver's license" or "passport" was provided by the customer. There is no "other" option, despite the Commission's clear guidance that alternative forms of identification are permitted. By restricting the options available, First Energy is forcing EGSs to either accept only a driver's license or passport as a qualified photo ID – thus denying customers who cannot provide such identification from shopping – or to misrepresent the form of identification provided by the customer. Both of these options are unacceptable. NRG Retail urges the Commission to direct First Energy to add an additional option to its photo ID drop down menu that allows an EGS to choose "other", or alternatively, as discussed in more detail below, to remove the requirement that EGSs indicate the form of photo ID in the EDC web portals.

In addition, when submitting a search through the First Energy companies' LUTs, an EGS must check two boxes attesting to First Energy that, "I have and will *return a signed LOA from the customer,*" and "This enrollment is customer initiated in a public location". First Energy's requirement that an EGS "return a signed LOA from the customer," contradicts the Commission's Final Order, where it states that, "the EDC does not have the responsibility of verifying the existence of an LOA," and that, "we reject the suggestions . . . that EDCs first obtain the LOA from the EGS and/or confirm with the

customer the existence of the LOA". The Commission's Final Order stipulates that "EGSs should, at the time of accessing the website portal to request an account number, attest to the fact that they have and will retain an LOA from the customer."²⁰ First Energy's attestation goes beyond the Commission's clear direction. NRG Retail urges the Commission to direct First Energy to change its LOA attestation to comply with the Commission's Final Order.

PPL requires a supplier to indicate via a drop down menu the form of customer identification that the customer provided, including "driver's license," "military ID," and "other." By including an "other" category, EGSs have the necessary flexibility to affirmatively attest that the customer provided some form of photo identification. In addition, PPL requires an EGS to check to attestation boxes: "LOA (Letter of Agreement) should be checked." and "Attestation required! Marketing Activities occurred in a public venue."

PECO requires an EGS to check a box attesting to the following: "By checking the User Attestation box on the left, I hereby attest that I am enrolling or soliciting a customer in a public venue AND I have obtained and will retain a signed Letter of Authorization (LOA) from each customer for whom account numbers are being requested." There is no required attestation related to photo identification in the PECO LUT, however PECO does require that the text file uploaded and submitted for a search include, for each account identified in the file, the form of identification provide by the customer.

NRG Retail supports the Commission's proposal to allow NGSs to accept either government issued photo identification or an alternative form of photo identification, and to note that form of identification on the LOA. Customers should not be denied the opportunity to shop for an energy supplier simply because they lack government issued photo identification. However, NRG Retail is concerned about the Commission's example, which suggests that an NGS would be required to capture the customer's driver's license (DL) number. Customers may view their DL number as sensitive, personally identifying information that they do not wish to share and a requirement to provide it to an NGS could dissuade the customer from enrolling with an NGS. Moreover, NRG Retail is not comfortable retaining such information.

²⁰ *Ibid* at 39.

As to the attestation made to the NGDC by the NGS regarding the form of photo identification provided, and based on its experience with the variety of requirements implemented by the EDCs, NRG Retail urges the Commission to clarify that both the EDC and NGDC web portals must simply allow for an EGS or NGS to attest *that the customer provided a photo ID*. The EGS/NGS should not be required to indicate to the EDC/NGDC the form of photo identification provided by the customer, particularly in light of the fact that some of the EDCs, notably the First Energy companies, have unilaterally restricted the forms of identification that can be accepted by requiring EGSs to attest that the customer provided one of only two possible forms of photo identification.²¹ It is the EGS/NGSs responsibility to maintain records on the form of photo identification provided by the customer and to provide those records to the Commission upon request.

Conclusion

NRG Retail appreciates the opportunity to share its experience and perspective on the improvements required if the customer account number look-up tools implemented by the EDCs are to fulfill their intended purpose. NRG Retail urges the Commission to enable the marketing of competitive retail natural gas supply service at public places to increase the visibility of retail competition and make it quicker and easier to shop for a natural gas supplier. Specifically, NRG Retail urges the Commission to:

1. Require the NGDCs to make their customer databases searchable via an on-line search tool, such as those currently implemented by the EDCs, to provide access to prospective customer account numbers to facilitate enrollments at public venues;
2. Direct the EDCs/NGDCs to clean up their customer databases to remove extraneous information, extra spaces, irregular characters, misspellings, etc., and to standardize their data to allow EGSs and NGSs to more easily and successfully search those data bases;
3. Require the EDCs, to the extent they are not already doing so, to enable wildcard searches in order to facilitate higher success rates when using the on-line account number look up tools;

²¹ How the utilities determined what forms of government issued photo identification would be included in the drop down menus they provide appears to be arbitrary, since the Commission did not restrict or provide any guidance on what constitutes an acceptable form of photo identification in its Final Order.

4. Require the NGDCs to implement search tools that allow for wildcard matching, allow for a multiple-account text file upload searches, and that return results that confirm the customer name and address information, and provides the customer's account number, regardless of whether the customer is on the ECL.;
5. Require the EDCs/NGDCs to update and post their ECLs/Databases on a more frequent basis to allow customers who have recently moved to successfully enroll with their chosen supplier;
6. Require First Energy to modify its web portal attestations and photo identification requirements in order to comply with the Commission's Final Order in Docket No. M-2013-2355751;
7. Clarify that both the EDC and NGDC web portals must simply allow for an EGS or NGS to attest *that the customer provided a photo ID* and not require an indication of the form of photo ID.

In sum, it is, after all, the customer's account number. If the customer has authorized an EGS/NGS to obtain his or her account number to complete his or her enrollment for energy service, no EDC/NGDC should prevent the transaction from being successful. The EDC/NGDC should be required to implement systems and processes that ensure the enrollment is quick and convenient for the customer.