



225 North Shore Drive
Pittsburgh, PA 15212

www.peoples-gas.com

Jennifer L. Petrisek
Senior Attorney
Phone: 412-208-6834
Email: Jennifer.Petrisek@Peoples-Gas.com

Via Electronic Filing

January 8, 2016

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

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

Dear Secretary Chiavetta:

On behalf of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively “Peoples” or the “Company”), attached for filing is the Compliance Plan pursuant to the Public Utility Commission’s (“PUC” or the “Commission”) Final Order entered on July 8, 2015 in the above-captioned proceeding.

As directed by the Commission in the July 8, 2015 Final Order, Peoples is providing an electronic copy of the Compliance Plan to the Commission’s Office of Competitive Markets Oversight. In addition, Peoples is providing copies of the Compliance Plan to the Office of Consumer Advocate, the Office of Small Business Advocate and the Commission’s Bureau of Investigation and Enforcement.

Please contact the undersigned at (412) 208-6834 should you have any questions or concerns regarding this matter.

Very truly yours,



Jennifer L. Petrisek
Senior Attorney

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PEOPLES NATURAL GAS COMPANY LLC, PEOPLES NATURAL GAS COMPANY LLC –
EQUITABLE DIVISION AND PEOPLES TWP LLC
COMPLIANCE PLAN**

I. INTRODUCTION

On April 9, 2015, the Pennsylvania Public Utility Commission ("PUC" or "Commission") issued its Tentative Order proposing a mechanism which would facilitate natural gas suppliers' ("NGSs") access to natural gas distribution company ("NGDC") ratepayer account numbers when the account number is not available from either the ratepayer or from the Eligible Customer List ("ECL"). Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively the "Company" or "Peoples") submitted comments for consideration by the Commission along with multiple other parties.

On July 8, 2015, the Commission issued a Final Order which outlined the final requirements for NGDCs development and implementation of an Account Number Access Mechanism ("ANAM") which must be available by August 31, 2016 for use by the NGSs during the 2016 fall marketing season. In the Final Order, the Commission directed all major Pennsylvania NGDCs to file compliance plans within six (6) months from the Final Order, which filing date is January 8, 2016. In accordance with the requirements outlined in the Final Order, Peoples hereby submits this Compliance Plan, as further described below.

II. COMPLIANCE PLAN

A. Secure Portal

In the Final Order, the Commission required NGDCs to develop an ANAM within their existing web-portals. The mechanisms would need to be secure and would require, at a minimum, the input of a username and password in order for a NGS to access any information.

In compliance with these requirements, Peoples will extend the Supplier Portal Platform to include a secure web environment that provides for an ANAM that delivers the account number for residential and small business customer accounts. As Customer specific information will be accessed on the ANAM, the Company believes it is important to ensure there are specific and individual NGS usernames and passwords for access to the ANAM. The Company will create an administrative environment for each specific NGS. The NGS will then be responsible for administering usernames and passwords for their employee's individual access. The NGS would be solely responsible for the protection of those usernames and passwords to ensure there is no unauthorized access by any individuals. The NGS will be solely responsible for implementing policies and practices to ensure current employees are trained in the importance of protecting the usernames and passwords, restricting use to only those employees who require access and ensuring usernames and passwords for individuals no longer employed are cancelled.

The Company will utilize its existing security practices and policies, which are based on best industry practices, when establishing usernames and passwords for the ANAM. Passwords will (1) require unique characters, such as symbols, capital letters, numbers, and minimum character counts, (2) have time limitations which require re-setting the password on a regular basis (for example, every 6 months), and (3) become locked if incorrect username/password combinations are entered a specific number of times. The Company may change the specific security measures from time to time to ensure the parameters are consistent with best industry practices.

B. Customer Information Inputs

The Final Order outlines several customer information inputs that would be required to be completed by the NGS in order to capture the proper customer account number for active accounts only: 1) the customer's full name or small business name, 2) service street address and 3) 5 digit postal code. The Commission further addressed wildcard and/or drop-down box functionalities and while not requiring the inclusion of these functionalities in the ANAM, the Commission strongly encouraged the NGDCs to review these options to determine their usability while maintaining consumer protections.

In compliance with the outlined requirements, Peoples will design the ANAM to require the input of the following information in order to capture the customer's account number:

- 1) the customer's full name – this includes the first and last name or the business name for small business accounts
- 2) house number and street name for the service address. Street types will not be required for entry (i.e. Street, Avenue, Road etc.)
- 3) 5 digit postal code.

Each input will be an “open” field where the NGS will type in the appropriate information. If there is not a match on the exact information described above, we will then allow a wildcard for first name and require an exact match on the “last name” in conjunction with an exact house number, street name and 5 digit zip code. In the case of a small business name, a wildcard entry will also be permitted. With this wildcard search, we will return a list of potential accounts. The NGS can then choose the correct account based on the information the customer’s provided to the NGS. The Company believes this solution will increase the opportunity for the NGS to locate the customer account number.

C. Customer Protections.

In the Final Order, the Commission outlines three confirmations that must be made by a NGS before the customer account number will be released by the ANAM. The three confirmations are: (1) NGS attestation that the customer signed a letter of authorization (“LOA”), (2) NGS attestation that the customer provided a government-issued or alternative photo identification, and (3) NGS attestation that the ANAM is being used in connection with marketing in a public venue.

In compliance with these requirements, the Company will require all three confirmations before releasing a customer’s account number through the ANAM. In order to designate the NGS is in compliance with each of the customer protection requirements, a check box will precede each of the following statements:

- I, as a representative of the Natural Gas Supplier to which this user-id and password is associated, attest that the customer signed a letter of authorization which permits me to search for their account number on this web-based mechanism.
- I, as a representative of the Natural Gas Supplier to which this user-id and password is associated, attest that the Customer provided me with their government issued or alternative photo identification.
- I, as a representative of the Natural Gas Supplier to which this user-id and password is associated, attest that this account-number-access-mechanism is being used in connection with marketing in a public venue.

The NGS must check each of these check-boxes and also input the type of government issued or alternative photo identification by typing a description of the identification into an “open” field before the ANAM will release the requested customer account number.

D. Record Retention.

The Final Order requires that the ANAM system be designed to retain information related to each customer account number inquiry for a period of at least three (3) years. In compliance with this requirement, the Company's ANAM system will retain the following information for a period of 3 years from the date the NGS requests the customer account number:

- When the system was accessed, including the specific NGS and specific user-name.
- The output of the attempt to access customer account information – whether the attempt was successful or unsuccessful. If successful, the account number provided.
- NGS attestation that the Customer signed an LOA
- NGS attestation that the Customer provided a government issued or alternative photo identification, and a recording of the type of identification from the “open” field that is limited to 40 characters.
- NGS attestation that the web-portal is being used in connection with marketing in a public venue
- Log-in failed attempts by username

E. Mechanism Outputs.

The Final Order requires that the ANAM produces one of three responses after the NGS enters the specific customer information noted in Section B above: “No Hit,” “Multiple Hits,” or the customer's actual account number. The Commission further encouraged the NGDCs to evaluate whether the ANAM could include an identification of the field(s) causing a “No Hit” or “Multiple Hits” response.

In compliance with this requirement, the Company will design the ANAM to produce one of the following responses: “No Hit,” Multiple Hits, the ratepayer's actual account number, or in the case of an account number assigned to a ratepayer with an active Protection from Abuse on file with the Company, the ANAM will provide a response that the account is a “Restricted Account”. In regards to identifying the customer information input field(s) causing the ANAM to fail to provide the actual customer account number, the Company's ANAM will identify the field causing the error. In the design protocol, the ANAM will look first to the account's first and last name, or business name, in conjunction with the service house number and street name and the 5 digit zip code. If there is an exact match, the account number will be provided. If there is “no hit” on the customer or business name, we will allow a wildcard to be used in the first name or business name field. If an account cannot be located as a result of the wildcard entry, a “no hit” will be returned. The Company will permit the NGS to re-enter the specific customer's information multiple times in order to obtain the customer's account number.

F. Cost Estimates.

The Commission previously requested cost estimations of the development and maintenance of the ANAM in the Tentative Order. However, as the Final Order modified the original proposal, the Commission seeks updated cost information in the Compliance Plan. Further, the Commission requires the NGDCs to include cost recovery proposals in the Compliance Plan, taking into consideration the proposal made by PECO which allocated fifty-percent (50%) of the cost to the NGSs.

In compliance with these requirements, the Company has developed an initial cost for the design and implementation of the ANAM, set up in the manner described herein, of \$85,500. This cost includes the design, development and testing necessary to implement the ANAM through a secure online portal. For the ongoing regular operation and maintenance of the ANAM, the annual estimated costs are \$10,000. This includes secure hosting and maintenance of the ANAM as well as training modules for the NGS users. The identified estimated costs for implementation, operations and maintenance of the ANAM will encompass access to the residential and small business ratepayers account numbers for Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC.

In regards to cost recovery, the Company proposes a cost sharing mechanism whereby the costs would be recovered from residential and small business ratepayers. To effectuate this cost sharing mechanism, the Company proposes to recover the implementation and annual costs through new riders that would be applicable to all residential and small business customers. These riders will be submitted to the Commission through separate tariff filings for the Peoples Division, the Equitable Division and for Peoples TWP with a proposed effective date of August 31, 2016. The riders will contain proposed new surcharges applicable to residential and small business sales and transportation customers and will be determined based on the total implementation and annual ongoing operating and maintenance (“O&M”) costs separately allocated to the Peoples Division, Equitable Division and Peoples TWP based on total residential and small business customers of each division/Company. Such riders would be annually reconcilable to actual costs incurred.

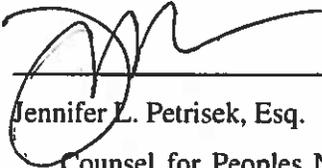
G. Timeline.

The Commission Final Order requires the ANAM to be operational by August 31, 2016. The Company does not foresee any issues with launching the ANAM on August 31, 2016. Should the Commission require any modification to this Compliance Plan, the Company may require additional time to design, deliver and test the modifications requested.

III. Conclusion.

Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC respectfully request that the Commission approve the Company’s Compliance Plan for implementation and ongoing operation of the Account Number Access Mechanism.

Respectfully submitted this 8th day of January, 2016,



Jennifer L. Petrisek, Esq.

Counsel for Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable
Division & Peoples TWP LLC
225 North Shore Drive
Pittsburgh, PA 15212

CERTIFICATE OF SERVICE

I hereby certify that I have on this 8th day of January, 2016 served a true copy of the Compliance Plan of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC in Docket Number Docket No. M-2015-2468991 (Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers) upon the individuals listed below in the manner stated

VIA REGULAR MAIL

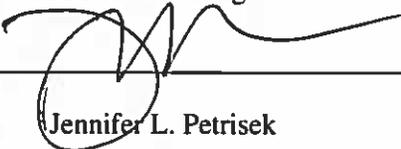
Johnnie E. Simms, Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105

Tanya McCloskey
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

John R. Evans
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

VIA ELECTRONIC MAIL

Public Utility Commission Office of Competitive Market Oversight
ra-ocmo@pa.gov



Jennifer L. Petrisek

Dated this 8th day of January, 2016