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Via Overnight Delivery

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April 14, 2016

APR 14 2016

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU


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 Peoples Reply to the Commission’s March 15, 2016 Secretarial Letter in the above-noted docket.

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

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

APR 14 2016

Natural Gas Distribution Company :
Customer Account Number Access :
Mechanism for Natural Gas Suppliers :

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU
M-2015-2468991

PEOPLES NATURAL GAS COMPANY LLC, PEOPLES NATURAL GAS COMPANY LLC –
EQUITABLE DIVISION AND PEOPLES TWP LLC
REPLY COMMENTS

I. INTRODUCTION

In accordance with the Secretarial Letter issued by the Pennsylvania Public Utility Commission ("PUC" or "Commission") in the above-captioned docket, Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively the "Company" or "Peoples") submits the following reply to the comments filed by the Retail Energy Supply Association ("RESA") on February 8, 2016 in response to the compliance filings submitted by the Natural Gas Distribution Companies on, or about, January 8, 2016.

II. PROCEDURAL BACKGROUND

On April 9, 2015, the Commission issued a 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") 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 was January 8, 2016. The Final Order afforded interested stakeholders

with the opportunity to file comments regarding the Compliance Plans within thirty (30) days from the date the compliance plans were filed.

On January 8, 2016, Peoples submitted its Compliance Plan (the "Peoples Compliance Plan"), as did the other affected NGDCs. In the Peoples Compliance Plan, the Company outlined its proposed ANAM and addressed each requirement contained within the Final Order. On February 8, 2016, RESA submitted reply comments to the NDGC's compliance plans (the "RESA Reply Comments").

On March 15, 2016, the Commission issues a Secretarial Letter which outlined a thirty (30) day period for interested stakeholders to submit reply comments to the RESA Comments. In accordance with the requirements outlined in the Final Order, Peoples hereby submits these comments.

III. REPLY COMMENTS

The RESA Reply Comments do not specifically object to any aspect of the Peoples Compliance Plan, nor do they contend that the Peoples ANAM proposal was not in compliance with the Final Order. Instead, the RESA Reply Comments restate and reargue the same issues already considered by, and decided by, the Commission in the July 8, 2015 Final Order. These restatements do not raise any new issues and are akin to an untimely request for reconsideration of the Commission's July 8, 2015 Final Order. On this date, the Energy Association of Pennsylvania has filed Reply Comments which more fully address the issues and arguments restated in the RESA Comments; Peoples fully supports these EAP Reply Comments.

Specific to the Peoples' Compliance Plan, on page 24 of RESA's Reply Comments, RESA notes that it "believes that Peoples' Compliance Plan sufficiently addresses the requirements of the *Final Mechanism Order*, except that it is silent on whether Peoples will provide the account number even if the customer is on the ECL and should be modified to address that omission."

In the January 8, 2016 Compliance Plan, Peoples outlined, in Section II.B, that the Final Order requires the ANAM to produce one of three responses after a NGS enters the required customer information: "No Hit," "Multiple Hits," or the customer's actual account number. (Compliance Plan, page 4). The next paragraph of the Peoples Compliance Plan provided an explanation of how the Company would comply with this requirement:

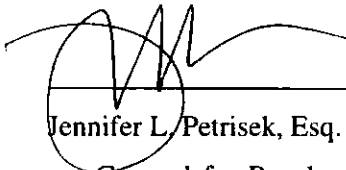
In compliance with this requirement, the Company will design the ANAM to produce one of the following responses: "No Hit," Multiple Hits, the ratepayer's actual account number, or in the case of an account number assigned to a ratepayer with an active Protection from Abuse on file with the Company, the ANAM will provide a response that the account is a "Restricted Account". (Compliance Plan, Page 4)

Peoples believes that the Compliance Plan was clear in that an account number would be provided each time the input customer information matched the information within the Company's customer information system. Peoples made no mention of withholding account numbers listed on the ECL, nor did it make any reference to providing a response of "On ECL" when an account number was requested. However, as it appears that there may have been some confusion related to the issue, Peoples confirms that if the customer information input in the ANAM matches a customer account, the account number for that customer will be provided even if the customer's information is already contained within the ECL (noting that an account number will not be provided if a customer has an active Protection from Abuse on file with the Company, as discussed within the Compliance Plan on page 4). If required by the Commission, the Company will resubmit a revised copy of its Compliance Plan to include a specific statement that the ANAM will not provide a response of "On ECL" when a customer account number is requested under the ANAM.

II. 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 without modification, as it is in compliance with the the requirements outlined in the July 8, 2015 Final Order. The Company further requests that the Commission issue such approval as expeditiously as possible so to ensure that the Company can meet the required August 31st delivery date.

Respectfully submitted this 14th day of April, 2016,



Jennifer L. Petrisek, Esq.

Counsel for Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable
Division & Peoples TWP LLC

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