



SPILMAN THOMAS & BATTLE, PLLC

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November 30, 2010

Via Electronic Filing and First Class Mail

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: Update and Amendment to the Initial Application for Natural Gas Supply Services to the Public for Interstate Gas Supply, Inc. d/b/a/ IGS Energy; Docket No. A-125051

Dear Secretary Chiavetta:

On November 10, 2010, pursuant to a statutory right of intervention conferred by the Pennsylvania General Assembly in Act 161, 71 P.S. § 309-2, the Office of Consumer Advocate ("OCA") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") a Notice of Intervention and Public Statement at the above-referenced docket addressing Interstate Gas Supply, Inc. d/b/a IGS Energy's ("IGS Energy") intent to use, and to operate in Pennsylvania under, the fictional name, "Columbia Retail Energy." IGS Energy has engaged the OCA in an effort to resolve the concerns raised in the Notice of Intervention and Public Statement.

As IGS Energy indicated in a letter filed with the Commission on November 15, 2010, IGS Energy and the Retail Energy Supply Association ("RESA") recently achieved a Settlement in Principle ("Settlement") on issues related to IGS Energy's use of the "Columbia Retail Energy" name and logo. In accordance with this Settlement, IGS Energy has agreed to employ certain customer-protection disclaimers in its marketing materials, and RESA has agreed to file for leave to withdraw its Protest and Petition to Intervene in this docket¹. Additionally, IGS Energy and RESA have agreed to jointly pursue a formal PUC rulemaking proceeding in order to address the concerns raised by both RESA and the OCA with respect to non-affiliated Natural Gas Supplier ("NGS") use of such fictional operating names.

By way of response to the OCA's Notice of Intervention and Public Statement, IGS Energy submits that the formal rulemaking proceeding presents the best venue for the Commission to resolve the concerns that the OCA has raised. Specifically, whereas the present docket pertains only to IGS Energy's individual PUC-approved NGS license, the rulemaking proceeding would address the broader, Commonwealth-wide issues implicated by the OCA's intervention. Nevertheless, IGS

¹ RESA filed its Notice to Withdraw the Protest on November 29, 2010.

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Energy will continue to work with the OCA to resolve the specific concerns related to IGS Energy's particular use of the fictional name "Columbia Retail Energy."

This document was filed electronically with the Commission on this date and served in accordance with the enclosed Certificate of Service.

Please contact the undersigned if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By

A handwritten signature in blue ink, appearing to be "D. Price" followed by a long horizontal flourish.

Derrick Price Williamson
Barry A. Naum

BAN

c: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Update and Amendment to the Initial :
Application for Natural Gas Supply Services : Docket No. A-125051
to the Public for Interstate Gas Supply, Inc. :
d/b/a IGS Energy :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the following parties to this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Dated: November 30, 2010