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January 17, 2014

VIA Express Mail

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

**Re: EDC Customer Account Number Access Mechanism for EGSs,
Docket No. M-2013-2355751**

Dear Secretary Chiavetta:

In accordance with the terms of the Commission's Final Order in the above docket entered on July 17, 2013, enclosed please the compliance plan of UGI Utilities, Inc. – Electric Division for developing a pass code protected secure website portal to provide Electric Generation Suppliers with access to customer account numbers.

Should you have any questions concerning this matter, please feel free to contact me.

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Very truly yours,

Mark C. Morrow

Counsel for UGI Utilities, Inc. – Electric Division

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDC Customer Account Number :
Access Mechanism for EGSs : Docket No. M-2013-2355751

UGI UTILITIES, INC. – ELECTRIC DIVISION
COMPLIANCE PLAN

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In accordance with the provisions of the Commission's Final order in the above-captioned matter entered on July 17, 2013, UGI Utilities, Inc. – Electric Division ("UGI") hereby submits for the Commission's review and approval a compliance plan for developing a pass code protected secure website portal that will provide Electric Generation Suppliers ("EGSs") access to customer account numbers, and in support thereof states the following:

1. Attachment A hereto contains UGI's proposed plan for developing and implementing a mechanism for providing EGS access to customer account numbers, including an implementation timeline and estimated costs.
2. Attachment B hereto is an illustrative example of the access mechanism screen, including the required field elements, for the purpose of making an exact match for the particular account holder query. The appearance and/or layout of the screen may change as needed.
3. The Commission's July 17, 2013 Final Order provides, in part, at page 49 that "access mechanisms should be in place and operational by the commencement of the 2014 outdoor marketing season; no later than May 2014. If an EDC is not able to meet this timeline, they should address the matter in their compliance filing."

4. UGI proposes to delay the implementation of its access mechanism until December 31, 2014 because (a) it currently has no EDCs actively marketing to residential customers on its system and does not anticipate this situation to change by the spring of 2014 and (b) has competing demands on its information system resources for higher priority matters.

5. With respect to cost recovery, UGI believes its proposed access mechanism benefits all customers, and therefore proposes to recover its development and implementation costs through its Energy Efficiency and Conservation Rider; UGI intends to recover costs related to the annual maintenance of the access mechanism and the costs to archive the data in its next base rate case.

6. Under its Commission-approved Energy Efficiency and Conservation Plan (“EEC Plan”), UGI is able to recover costs related to various programs through a non-bypassable charge.

7. One of the programs in the EE&C Plan, the Customer Energy Education Program, provides customers with information about how to shop for electric generation service, the price to compare and how it is calculated, and other pertinent customer choice information. This information lays the necessary groundwork for building a competitive retail market.

8. Under this cost recovery mechanism, development and implementation costs for the access mechanism would be allocated to the three classes in the EEC Plan based on the number of customers in each class.

9. The costs would then be included in the rate development for each class based on estimated usages.

10. Attachment C hereto contains proposed *pro forma* tariff pages to implement this cost recovery mechanism, and UGI respectfully requests the Commission to authorize it to implement these proposed tariff revisions on one-day’s advance notice.

ACCORDINGLY, UGI respectfully requests that the Commission (a) approve UGI's proposed access plan, (b) grant UGI an extension until December 31, 2014 to implement its access plan, and (c) authorize UGI to implement its proposed tariff revisions on one day's advance notice.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Mark C. Morrow". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark C. Morrow

Counsel for UGI Utilities, Inc. – Electric Division

ATTACHMENT A
(Compliance Plan)

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UGI Utilities, Inc. – Electric Division

Compliance Plan – Customer Account Number Access Mechanism for EGSs

Objective

To comply with the Public Utility Commission's Final Order regarding EDC Customer Account Number Access Mechanism for EGSs entered on July 17, 2013 at M-2013-2355751. UGI Utilities, Inc. – Electric Division ("UGI") will provide an instant access tool through which a qualified EGS can obtain a prospective customer-specific account number when marketing in public venues such as malls, fairs, trade shows and other community events in order to facilitate enrollments.

Target Users

UGI will make this tool available to EGSs who have completed both of the following:

- the registration process required by UGIs Electric Generation Supplier Coordination Tariff Electric – PA PUC No. 1S
- the EDI testing requirements necessary for enrolling customers

Strategy

UGI will utilize the section of its website titled "Supplier Information" that is currently available to EGSs as the location for its customer account number access mechanism "access mechanism". This website location is already familiar to the EGSs who are currently serving customers in the UGI service territory and is where the entry point is located to the Eligible Customer List and other important choice supplier information. The access mechanism is intended to be used by EGSs during the time when their marketing efforts occur at a public venue. This access mechanism will be developed such that it can be monitored and tracked by UGI for the purposes of complying with regulators' requests for such data. The access records will be maintained for three years per the supplier switching regulations at 52 Pa. Code §57.179.

Access Mechanism Development

Attachment B is a screen shot of the access mechanism including the required field elements for the purpose of making an exact match for the particular account holder query. The screen shot is for illustrative purposes only and the appearance and/or layout may change as needed. The steps involved in developing the access mechanism are outlined below.

1. Create access mechanism icon.
2. Create fields required for completion before customer account number will be provided.

The required field elements are:

- a) customer's full name
- b) service street address
- c) five-digit postal code
- d) a check box to indicate that the EGS is attesting to certain facts. Those facts are that the EGS is currently marketing at a public venue and has obtained both a type of photo identification and a signed Letter of Authorization (LOA) from the customer.

- e) type of photo identification
 - f) name on photo id
3. An exact match using the first three elements of the request will be required as part of the program logic when matching against the UGI database to ensure that the correct account number is being provided. Only active accounts will be included in the UGI database.
 4. When an exact match is found, the twelve-digit customer account number will be displayed on the screen. In the event that the input data matches an account with a Protection from Abuse (PFA) indicator, the phrase "PFA restricted" will be displayed. Under this circumstance, it is UGI's normal business practice to ensure that information is not released to anyone but the account holder. There are only 10 customers in the UGI service territory that would currently respond with a "PFA restricted" response upon account number request.
 5. When an exact match is found for more than one account number and a single account holder cannot be identified, the phrase "multiple hits" will be displayed. The access mechanism will not know which inputs are correct and which are not correct for the particular account holder query. There is one additional circumstance where the required data elements will match more than one account number. That circumstance would be when a customer has a separate outdoor lighting and/or controlled water heating account in addition to their regular service account. In those circumstances, all account numbers will be provided.
 6. When an exact match is not found, the phrase "no hits" will be displayed. The program logic will be developed to first look at service street address, next to the 5-digit postal code, and last to the name. Since the program will require a match on all three of these elements, the reason for the lack of a match will first be on whether the service street address is in our database. If the service street address is not in our database, then that will be the reason displayed for the "no hit". If the service address is in our database, the next step in the logic will be to match on the postal code. If the postal code does not match the service street address, the postal code will be the reason displayed for the "no hit". Last, if the service street address and the postal code are found together in our database, but the name does not match, the customer name will be the reason displayed for the "no hit".
 7. A record of who used the access mechanism, when they used it, what information they obtained, and what form of customer photo identification was acquired will be archived for three years.

Implementation Timeline

The Commission's Final Order required the access mechanism to be in place and operational no later than May 2014. UGI is requesting an 8-month extension to the May 2014 date and plans to have this access mechanism in place and operational by December 31, 2014.

Estimated Costs and Cost Recovery

UGI estimates that the cost to develop and program the access mechanism will be approximately \$42k.

<u>Costs</u>	<u>Access Mechanism - Expense Description</u>
\$5,713.00	Filing Costs – Administrative
\$36,000.00	600 Hours for Programming, Testing and Implementing
<u>\$41,713.00</u>	

ATTACHMENT B

(Illustrative Example of Access Mechanism Format)

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UGI Utilities, Inc. – Electric Division
Illustrative Example of Access Mechanism Format

(1) Customer Account #
(2) "Multiple Matches"
(3) "No Matches"

Search Results

(1) No matching street address in database – verify data and re-submit
(2) No postal code matches street address - verify data and re-submit
(3) No name matches street address and postal code – verify data and re-submit

Possible reason for "No Match". Verify data and re-submit.

Input Data Fields (* denotes required fields):

*Customer Last Name

*Customer First Name

*House/Bldg

Apt #

*Street Name

*Street Type

*5 Digit Postal Code

*Type of Photo ID

*Name on Photo ID

*Attestation
Checkbox¹

Submit

¹ By checking the box, you are attesting to the following facts: customer is being enrolled in a public location and a signed letter of authorization (LOA) along with a photo identification has been obtained

Note: This format is for illustrative purposes only and may change through the development process.

ATTACHMENT C
(*Pro Forma* Tariff Pages)

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UGI UTILITIES, INC.
ELECTRIC DIVISION
ELECTRIC SERVICE TARIFF

LUZERNE COUNTY

City of Nanticoke, and Boroughs of Courtdale, Dallas, Edwardsville, Forty-Fort, Harvey's Lake, Kingston, Larksville, Luzerne, New Columbus, Plymouth, Pringle, Shickshinny, Sugar Notch, Swoyersville, Warrior Run, West Wyoming and Wyoming.

First Class Townships of Hanover and Newport, and Second Class Townships, of Conyngham, Dallas, Fairmount, Franklin, Hunlock, Huntington, Jackson, Kingston, Lake, Lehman, Plymouth, Ross and Union.

WYOMING COUNTY

Townships of Monroe and Noxen

Issued:

Effective:

BY: Paul J. Szykman
Vice President – Rates
2525 North 12th Street, Suite 360
Post Office Box 12677
Reading, Pennsylvania 19612-2677

NOTICE

THIS TARIFF MAKES CHANGES TO EXISTING RATES (PAGE 2)

LIST OF CHANGES MADE BY THIS TARIFF

RULE 37 – ENERGY EFFICIENCY AND CONSERVATION RIDER – PAGES 43W-43X:

The Energy Efficiency and Conservation Rider has been modified to include cost recovery for expenses related to the development and implementation of the Customer Account Number Access Mechanism.

RULES AND REGULATIONS (continued)

37. ENERGY EFFICIENCY AND CONSERVATION RIDER

37-a General. The Company shall recover costs related to the Company's Energy Efficiency and Conservation Plan ("EECP") for 2012-2015 through an Energy Efficiency and Conservation Rider ("EEC Rider"). In addition, the Company shall recover costs related to the development and implementation of a Customer Account Number Access Mechanism through the EEC Rider. The rates under the EEC Rider shall be computed separately for each of the three customer classes listed below. The EEC Rider Rate for each class shall be as follows:

(C)

Customer Class	Rate Schedules	EEC Rider Rate (¢/kWh)
Class 1 – Residential	R, RWT, RTU, GS-5 and the residential portion of Rate Schedules CWH, OL, SOL, MHOL, or successor rate schedules	0.096
Class 2 – Non Residential	All Non-Residential Rate Schedules except for Rate Schedules LP and IH	0.160
Class 3 – Non Residential	LP and IH	0.103

The EEC Rider shall apply to all customers whether they are receiving generation service from the Company or not, and shall be subject to the Tax Adjustment Surcharge.

37-b Calculation. The EEC Rider shall be determined as follows:

- Costs to be recovered shall include Company incurred costs to implement its Commission approved EECP during each plan year, including all costs incurred to develop and administer the Company's EECP. The costs of each EECP program shall be directly assigned to the applicable customer class. Costs which can not be directly assigned to a particular residential or non-residential customer class shall be allocated based on sales. Additional costs to be recovered include the costs incurred to develop and implement the Commission approved Customer Account Number Access Mechanism. These additional costs shall be allocated to the customer class based on the number of customers in each class.
- The Residential EEC Rider rate shall be calculated in accordance with the formula below and shall be rounded to the third decimal:

(C)

$$\text{Residential EEC Rider Rate} = ((Cr / Sr) - (Er / Sr)) / (1-T) \text{ where}$$

Cr = Projected Annual Residential EECP Costs.

Sr = Projected Annual Residential Class Sales.

Er = Net over or under collection of the Residential EEC Rider resulting from the difference between the EEC Rider revenues received and the EECP costs incurred. The over or under collection shall be calculated annually and include the actual over or under collection where actual data is known for the reconciliation period and an estimate for those revenues and costs still unknown for the reconciliation period. The difference between the actual net over or under collection related to the estimate shall be included in the net over or under collection in the following year.

T = Total Pennsylvania gross receipts tax rate as reflected in the Company's base rates, expressed in decimal form.

(C) Indicates Change

Issued:

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RULES AND REGULATIONS (continued)

37. ENERGY EFFICIENCY AND CONSERVATION RIDER

1. The Non-Residential EEC Rider rates shall be calculated in accordance with the formula below and shall be rounded to the third decimal:

$$\text{Non-Residential EEC Rider Rate} = ((C_n / S_n) - (E_n / S_n)) / (1-T) \text{ where}$$

C_n = Projected Annual Non-Residential EEC Costs.

S_n = Projected Annual Non-Residential Class Sales.

E_n = Net over or under collection of the Non-Residential EEC Rider resulting from the difference between the EEC Rider revenues received and the EEC costs incurred. The over or under collection shall be calculated annually and include the actual over or under collection where actual data is known for the reconciliation period and an estimate for those revenues and costs still unknown for the reconciliation period. The difference between the actual net over or under collection related to the estimate shall be included in the net over or under collection in the following year.

T = Total Pennsylvania gross receipts tax rate as reflected in the Company's base rates, expressed in decimal form.

Class 2 and Class 3 Non-Residential EEC Rider rates shall be calculated and reconciled separately.

4. The Residential and Non-Residential rates under the EEC Rider shall become effective coincident with the effective date of the first quarterly default service rate filing following Commission approval of the EEC. The Residential and Non-residential rates under the EEC Rider shall be updated and reconciled annually thereafter and filed with the Commission effective on one day's notice. The Company reserves the right to make an interim filing to adjust the rates under the EEC Rider to be effective on sixty (60) days notice.
5. Any over or under collection at the end of the third plan year shall be recovered or refunded during the following year. Any remaining over or under collection after the fourth year shall be recovered or refunded through the default service rate by class.

From: (610) 992-3209
Mark Morrow
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460 N. Gulph Road

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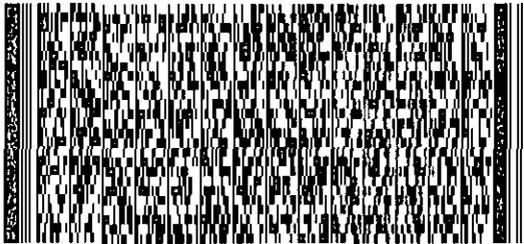
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Pennsylvania Public Utility Comm.
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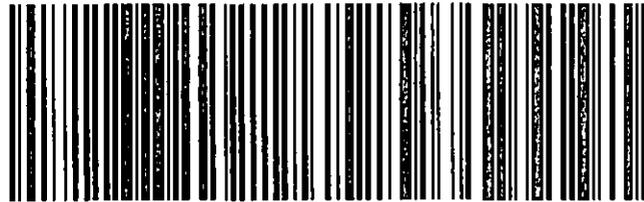


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