

**PENNSYLVANIA
PUBLIC UTILITY COMMISSION
Harrisburg, PA 17105-3265**

Request for Clarification
on Notice Requirements for
Combined Electricity and Natural
Gas Disclosure Statements; 52 Pa. Code
Sections 54.5, 54.10 and 62.75.

Docket No. L-2014-2409385

COMMENTS OF WASHINGTON GAS ENERGY SERVICES

Pursuant to the Pennsylvania Public Utility Commission's Tentative Order in Docket No. L -2014-2409385 issued on July 9, 2014 (Tentative Order), Washington Gas Energy Services (WGEServices) respectfully submits these comments.

WGEServices supports OCMO's recommendation to the Commission to provide suppliers with the flexibility to combine gas and electricity customer notice requirements for contract renewals/expiration. As indicated in the Tentative Order, OCMO made the recommendation after evaluating a request from Independence Energy Group LLC d/b/a Energy Rewards (Energy Rewards) for clarification of the applicability of the contract renewal/expiration notice requirements for those customers who obtain competitive electric generation and gas supply service from the same supplier.

The notice provisions in the natural gas industry disclosure regulations at 52 Pa. Code §62.75.(g)(1) require two notices to be sent—one at about 90 days and the second at about 60 days — prior to the expiration of a natural gas contract to explain the customer's contract renewal options. However, the Commission's new electric industry rules at 52 Pa. Code § 54.10(a)(1) require an initial notice to be sent 45-60 days prior to contract expiration and an options notice to be sent at least 30 days prior to contract expiration.

Energy Rewards asked the Commission to consider whether a lesser number of notices could be allowed than the four notices these rules would otherwise require, in those instances, where a customer obtains competitive electric generation and gas service from the same supplier.

The Commission limited its proposed ruling on this issue to "circumstances in which a customer contracts for both electric and gas services from one supplier at the same time under contracts with approximately the same expiration date."¹ In other words the Commission tailored its proposed solution to a specific set of customers.

Recognizing that there are differences between the gas and electric supplier industries, the Commission proposed that "... if a supplier wants to make the terms of the customer's electric and natural gas service more similar, the supplier is free to provide the customer with the same rights for the natural gas service that apply to the electric service (generally, it is acceptable to provide a customer with a greater level of protection than required by a regulation – it is not acceptable to provide a lesser level of protection than required)."²

WGEServices strongly supports OCMO's recommendation that suppliers have the flexibility to limit their mailings to two notices even though the rules do not require them to do so. WGEServices provides both electric and gas supplier services; and, therefore has customers who receive both services from it. Upon adoption of OCMO's recommendation as set forth in the Tentative Order, WGE Services would welcome the flexibility to modify its current processes for its electric and gas customers to provide these customers with two notices in accordance with OMCO's recommendation, instead of four separate notices. WGES would welcome the flexibility and efficiency that the Commission's Tentative Order would provide.

¹ Tentative Order pg 4.

² Id. pg 6.

In Conclusion, WGEServices supports the Tentative Order, which provides flexibility to suppliers while preserving important customer notice requirements.

Respectfully submitted,



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