



Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL 717 237 6000
FAX 717 237 6019
www.eckertseamans.com

Daniel Clearfield
717.237.7173
dclearfield@eckertseamans.com

July 29, 2014

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

**Re: Request for Clarification on Notice Timeline 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**

Dear Secretary Chiavetta:

On behalf of Independence Energy Group LLC d/b/a Energy Rewards (“Energy Rewards”) this letter responds to the Commission’s request for comments on the proposed Office of Competitive Market Oversight (“OCMO”) recommendation for contract renewal timeframes for those customers receiving both competitive retail electric generation and natural gas supply service from the same supplier.

Energy Rewards sought clarification of the Commission’s rules to address a concern that sending four notices to a customer taking service under a combined electricity and natural gas contract will cause unnecessary confusion and result in a poor shopping experience for the customer. Energy Rewards sought to minimize customer confusion by sending just two notices to customers taking combined electricity and natural gas service and had proposed doing so in accordance with the contract expiration notice timeline provisions included in Section 54.10 (a) (1) and (2).

OCMO has proposed that in instances where a customer is receiving both electric generation and natural gas supply service from the same competitive supplier and the terms for both services expire within 30 days of each other, it is acceptable to send two contract expiration notices that address both services (rather than four). OCMO further indicated that the timing of the two notices must comply with the timeframes found in the natural gas disclosure regulations; 52 Pa. Code §62.75(g)(1) —one at 90 days and the second at 60 days. OCMO’s proposal further clarifies that:

- Suppliers are obligated to clearly communicate the differing expiration dates for each service;

- The two notices, initial and options, must always be provided as the contract nears expiration, regardless if terms and conditions are changing;
- The notices need to clearly make the needed distinctions between the prices and terms of the customer's electric service and their natural gas service;
- While allowing a supplier to use two notices instead of four in these limited circumstances, suppliers are not required to limit their mailings to two notices – suppliers may continue to follow the separate regulations for electric and natural gas supply notice requirements; and
- All other aspects of the electric regulations (52 Pa Code §§ 54.5 and 54.10) must be applied to the customer's electric generation service.

Energy Rewards appreciates and supports OCMO's proposal. Allowing suppliers the flexibility – under the appropriate circumstances – to send two contract expiration notices instead of four will facilitate a more positive shopping experience for customers taking combined gas and electricity service from licensed retail suppliers. We also support OCMO's proposal to review these issues more thoroughly as part of the Commission's Natural Gas Retail Markets Investigation.

Please feel free to contact either me or Leah Gibbons (at 301.509.1508 or via Email at leah.gibbons@nrgenergy.com) if you have any questions or require additional information.

Sincerely,



Daniel Clearfield
DC/lww

cc: Office of Competitive Market Oversight