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Via E-Filing

June 30, 2025

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Columbia Gas of Pennsylvania, Inc.'s Notice of Compliance
R-2018-2647577**

Dear Secretary Homsher:

By Order entered December 6, 2018, the Pennsylvania Public Utility Commission ("Commission") approved a Joint Petition for Partial Settlement and ruled on certain reserved issues with respect to Columbia Gas of Pennsylvania's ("Columbia") 2018 base rate proceeding. One reserved issue concerned Columbia's billing practice of including on its bills a separate line-item charge for non-commodity services offered by third parties. Columbia's practice at that time limited access to only two approved third parties. In its Order, the Commission rejected Columbia's limitation on the parties that would be allowed to access this "on-bill" billing, stating:

Columbia must comply with Section 1502 of the Code and provide its "on bill" billing policy in a way that is nondiscriminatory. In other words, Columbia must either provide such a service to all entities that provide such non-basic services or must discontinue the "on bill" billing policy. Columbia may not continue to provide this ability to only the two entities referenced in this case. Should Columbia provide the service to all entities providing non-basic services, we recognize the potential need for reasonable limitations, such as a requirement that the entities be able to provide information to Columbia in a manner that conforms to Columbia's billing practices, spacing and technologies. As such, we shall require Columbia to report to this Commission's Bureau of Technical Utility Services, within 60 days of the entry day of this Opinion and Order, its methodology for coming into compliance with Section 1502 of the Code. We reiterate the requirements of 52 Pa. Code § 56.83(3) which directs that a customer's service may not be terminated for nonpayment of such nonbasic charges.

On March 18, 2019, Columbia submitted a report in compliance with the Commission's December 6, 2018, Order. In its report, Columbia stated that it was discontinuing its "on-bill" billing practice. Columbia stated that it would no longer provide third parties access to its bills, and that access to the two third parties would end as of the termination date of their contracts.

Subsequently, by Order entered August 8, 2019, the Commission rejected Columbia's proposal to allow the two third party contracts to continue until the end of the contracts. The Commission directed Columbia to end its "on-bill" billing practice with the two third parties within two customer bill cycles, or the end of the contracts, whichever came first.

On November 7, 2019, Columbia submitted a Notice of Compliance. In the Notice, Columbia stated that one of the contracts ended as of September 30, 2019, and the second contract was terminated as of October 28, 2019. Columbia further stated that as of October 28, 2019, Columbia had discontinued its "on-bill" billing practice.

This letter is to serve as notice that Columbia intends to change its practice to permit "on-bill" billing. In compliance with the Commission's December 6, 2018, Order, Columbia will provide such a service to all entities that desire the service on a non-discriminatory basis. In accordance with the requirements of 52 Pa. Code § 56.83(3), a customer's service may not be terminated for nonpayment of such nonbasic charges. In addition, the following limitations shall apply with respect to requests for "on-bill" billing:

To support third-party participation on utility bills for non-basic services, Columbia will implement a consistent, written, contractual framework. The following is a general outline of the standard terms and conditions that will apply to any third-party requests for "on-bill" billing:

Entry Fee and Annual Billing Fees

Third parties are required to pay a one-time entry fee to cover Columbia's internal and external costs associated with integrating the third party into Columbia's billing system. Additionally, an annual billing fee is charged to support baseline billing system services and is invoiced in equal monthly installments.

Monthly Per-Customer Billing Fee

A recurring monthly fee is assessed for each customer billed through Columbia's system. This fee is designed to recover the incremental cost of including and processing third-party charges on customer bills.

IT Integration, Maintenance and Modification Costs

Third parties must cover the cost of access to customer-facing systems such as websites, IVR, and mobile apps. This includes a base access fee and an annual maintenance fee. If enhancements or additional services are requested beyond the baseline support, Columbia may charge additional fees based on actual costs incurred. Access to IT integration services and customer list data described below is contingent upon payment of the entry fee and annual billing fees.

Customer List Access and Associated Fees

Upon request and subject to applicable privacy policies and customer preferences, Columbia may provide updated customer lists. A recurring fee applies for this service. Third parties are required to delete outdated lists upon receipt of new ones and certify compliance. Additional provisions may allow for integration with utility communication channels, such as website links, subject to feasibility and security considerations.

Contract Term Lengths

A long initial term, typically spanning multiple years, with automatic renewal periods unless terminated with advance notice. This structure provides long-term stability while allowing for periodic review and adjustment.

Insurance Requirements

Third parties must maintain comprehensive insurance coverage, including general liability, auto liability, umbrella/excess liability, cyber liability, professional liability, and workers' compensation that conforms with company standards.

Indemnification

Third parties are required to indemnify Columbia against claims arising from breaches of the agreement, issues with covered products, or allegations that Columbia is acting as a debt collector or advertiser on behalf of the third party.

Data Privacy and Security

Strict obligations apply to the handling of customer information. These include compliance with all applicable data privacy laws, restrictions on data use and sharing, incident reporting requirements, and annual audits. Data must be stored and processed within the United States.

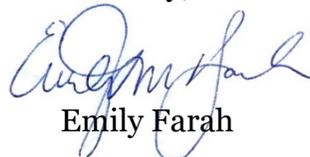
Confidentiality

All customer and business information must be treated as confidential. Unauthorized use or disclosure is prohibited, and violations may result in injunctive relief and other remedies.

Any questions regarding this Notice should be directed to the undersigned.

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Sincerely,



Emily Farah

/kak
Enclosure
Cc Joseph Magee/BCS
Louise Fink Smith/Law Bureau

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

VIA E-MAIL

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Dated: June 30, 2025_