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***Via e-filing and Overnight Delivery***

April 20, 2009

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56  
to Comply with the Provisions of 66 Pa.C.S. Chapter 14  
Docket No. L-00060182**

Dear Mr. McNulty:

Enclosed please find the original and sixteen (16) copies of Columbia Gas of Pennsylvania's Comments in Response to March 31 Secretarial Letter, to be filed in the referenced matter. Please file the original and fifteen (15) copies and return the extra copy to me, file stamped, in the self-addressed envelope provided.

Also enclosed is a copy of the document on disc.

I thank you for your assistance.

Sincerely,



Theodore J. Gallagher

enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re: Rulemaking to Amend the** :  
**Provisions of 52 Pa. Code, Chapter 56** :  
**to Comply with the Provisions of** : **Docket No. L-00060182**  
**66 Pa.C.S., Chapter 14; General** :  
**Review of Regulations** :

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**COMMENTS OF COLUMBIA GAS OF PENNSYLVANIA, INC.  
IN RESPONSE TO MARCH 31, 2009  
SECRETARIAL LETTER**

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Columbia Gas of Pennsylvania, Inc. (“Columbia”) hereby submits the Comments below in response to the Commission’s Secretarial Letter, Dated March 31, 2009, concerning e-billing programs. Columbia’s responses to the enumerated areas of inquiry in that Secretarial Letter are as follows:

1. Scope and description of Columbia’s current e-billing program:

On August 9, 2006, Columbia filed a Petition at Docket No. P-00062230 seeking a partial waiver of 52 Pa. Code § 56.21, seeking to implement e-billing. Columbia subsequently filed an Amended Petition on December 5, 2006. By Order entered March 23, 2007 (“2007 Order”), the Commission granted Columbia’s Petition and granted a temporary partial waiver of 52 Pa. Code § 56.21. Columbia’s e-billing program conforms to the following directives in the Commission’s 2007 Order:

The due date for payment of a bill may be no less than 20 days from the date of transmittal of the email to the customer advising the customer that the bill is available for viewing on the Internet; that is, the date of emailing, postal mailing, or physical delivery of such notice by the utility to the customer. In the event of a failed delivery of an email communication, Columbia shall attempt to contact the customer directly to secure an active email address. If an active email address is secured, then the bill notification email will be resent to the customer, and the 20 days shall commence upon successful transmittal. If a correct, active email address cannot be obtained and personal contact cannot be made, then a duplicate paper bill will be sent to the customer's mailing address of record, and the 20 days shall commence upon transmittal of the paper bill.

Consistent with Columbia's proposal in its Amended Petition, participants in Columbia's e-billing program have two options. The first option, which is referred to as the "In-House Option" is one offered entirely by Columbia. While the In-House Option has not yet been launched to Columbia's customers, Columbia does plan to offer this option in the near future. With this option the customer has the ability to enroll electronically via the Columbia website. Once enrolled, the customer no longer receives his or her bill via the mail. Instead, he or she receives an e-mail notification that their bill is ready and is provided a link to the Columbia website where they can view it and make payment.

The second option is for those customers who prefer to receive their utility bill via Checkfree ("Checkfree Option"), a popular electronic bill consolidator with over 20 years' experience in processing customer payments. Columbia's confidence in Checkfree's ability to effectively provide this service is supported by Checkfree's performance since Columbia launched its e-billing using Checkfree with its Pennsylvania customers in September of 2007. Similar to the In-House Option, after enrolling customers cease to receive a paper bill. Instead, Checkfree sends the customer an email notifying them when a bill is waiting for them. The customer can then go to the Checkfree website to view his or her bill and make payment.

With either option, once logged into the secure web site, the customer is able to: review their bill (containing all the information in the same format as a paper bill); read all bill inserts and notices; print a copy of the bill; review all required billing disclosures and safety notices; make elections concerning donations to the Hardship Fund; chose to pay their utility bill through a variety of payment types (e.g. credit card or direct debit); and even make a full or partial payment directly from the secure website. After payment, the customer receives a payment confirmation showing the amount and date of payment. If a customer chooses either of the electronic bill options, Columbia will no longer send that customer a paper bill. Once a customer enrolls in electronic billing he or she receives a final paper bill. Thus, for one month the customer receives both a paper bill and an electronic bill. Thereafter, however, all bills are in electronic form only. Upon request, Columbia customers may still, obtain a duplicate paper bill. Electronic bills are archived on the Columbia website and retrievable by customers electronically for at least six months. In addition, customer usage information is available on the website for at least 13 months.

All reminder notices required under Chapter 56, however, continue to be sent to the customer via United States Mail. If an electronic bill notification e-mail is returned as undeliverable, Columbia or Checkfree, as the case may be, will resend the email two additional times. If the email is still undeliverable, Columbia or Checkfree, as the case may be, will post a message on its website that appears when the customer logs in. Columbia also attempts to contact the customer via phone to have the email address corrected. If through these efforts, Columbia still fails to gain customer's proper email address, Columbia will issue a paper bill to customer with a new due date that complies with the requirements of 52 Pa. Code Section 56.21. With the issuance of a paper bill, the customer is removed from the electronic billing program.

At the present time, if a customer is removed as described, he or she would have to reenroll for electronic billing.

2. Current levels of participation in current e-billing programs

As of the end of February 2009, there were 14,773 customers using e-billing on Columbia's system, which translates into 3.55 percent of Columbia's customer base. Program participation has more than doubled in the past 12 months and Columbia expects strong growth to continue as the Company prepares to implement its In-House eBill Option to complement the existing Checkfree eBill Option.

3. Tariff changes made or which should be made to implement e-billing

Columbia has not made tariff changes to implement e-billing. Columbia submits that tariff changes are not necessary to implement e-billing.

4. Changes made to e-billing program since its inception

Columbia has made no changes to its e-billing program since its inception.

5. Information that was or will be contained in bill inserts

A message appears under "Payment Methods" in the left column of customer bills, if the customer is not already enrolled in CheckFree e-Bill.

A teaser article appeared in the Summer (July) 2007 edition of the customer newsletter, *GasLines*, announcing that the service offering would become available in August, and a follow-up story appeared in the Fall (October) 2007 edition.

Periodically, customers may hear a promotional on-hold message if a Customer Service Representative needs to place them on hold while responding to a question about their account.

Information about CheckFree e-Bill also appears on the Columbia Gas of Pennsylvania Web site, with links to the MyCheckFree site to enroll.

Copies of bill inserts are attached hereto.

6. Any other concerns regarding e-billing that the PUC should consider

Columbia's e-billing program is working well and, as noted above, enrollment continues to increase. Since its inception, Columbia has had no informal or formal complaints concerning e-billing. Columbia is concerned with the proposed Section 56.25(4), which appears to require public utilities to furnish paper receipts to e-billing customers. Columbia refers to the discussion of this issue in its Comments to Proposed Rulemaking, filed April 20, 2009 in this matter.

Respectfully submitted,

COLUMBIA GAS OF PENNSYLVANIA, INC.

By:

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Mark R. Kempic (Atty I.D. No. 64718)  
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Its Attorneys

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Columbia Gas<sup>®</sup>  
of Pennsylvania  
A NiSource Company

# GasLines

**In this issue:**

- Natural gas lines —  
What is your responsibility?
- Coming soon: e-Bill
- Our address has changed!
- Keep your cool in the heat
- Protecting your privacy
- Keep clear access to meters

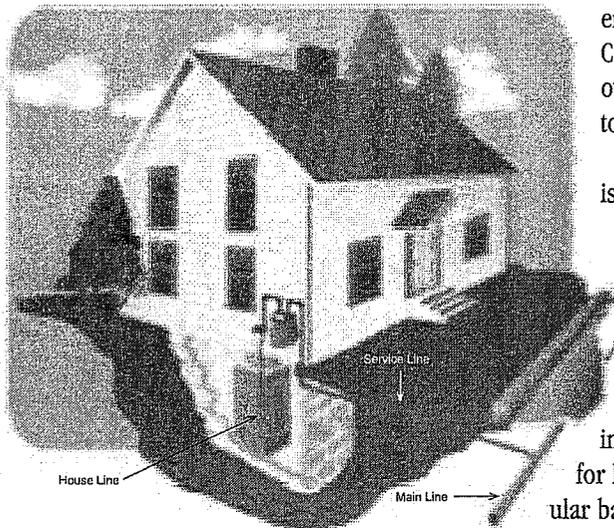
[www.columbiagas.com](http://www.columbiagas.com)

**AOL Keyword: Columbia Gas**

Summer 2007

We Deliver News and Information for You

## Natural gas lines – What is your responsibility?



Natural gas is transported from producing wells through large underground pipelines called transmission lines. The gas then travels to cities and towns through main lines. From the main lines, natural gas is carried to your home or business through service lines, which stop at the gas meter. In some operating areas of western Pennsylvania, Columbia Gas owns and maintains the main supply lines to the curb box at the street. However, the property owner is responsible for repairing or replacing all service lines and house lines beyond the curb box, including any that extend beyond the meter to the appliances in your home or business. In east-

ern Pennsylvania, Columbia Gas owns the lines up to the meter.

If buried piping isn't maintained, it might become subject to corrosion and leakage over time. For your safety, we inspect pipelines

for leakage on a regular basis. If the line is metallic, we also inspect it for corrosion. Our routine inspection covers all gas piping between the main line and the meter.

If our inspection detects a problem in any portion of the piping, we might have to interrupt your service

until it's been repaired. Any inspection, installation, repair or replacement of natural gas lines or appliances that you own should be done only by a licensed heating/cooling contractor or plumber who is certified by the U.S. Department of Transportation. Visit our Web site at [www.columbiagas.com](http://www.columbiagas.com) for a current list of qualified plumbers in your area.

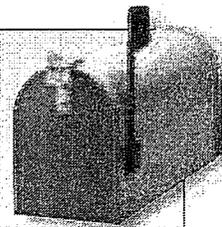
### Coming soon: e-Bill

Go paperless! Starting next month, you'll have the opportunity to receive and pay your Columbia Gas bill online at no charge with our new CheckFree e-Bill service. Watch your bill for details, or visit our Web site at [www.columbiagas.com](http://www.columbiagas.com).

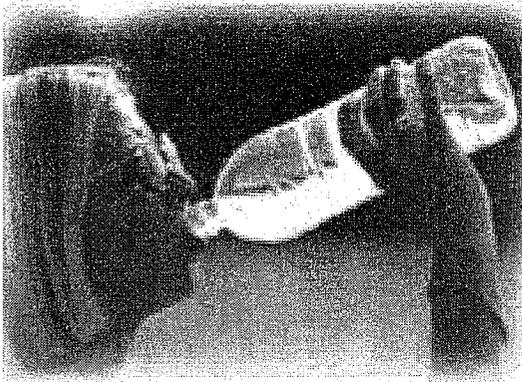
### Our address has changed!

Our payment mailing address has changed to provide more efficient posting of payments to your account. The new address is P.O. Box 9001846, Louisville, KY 40290-1846. You'll see the new address on your payment coupon, and in the left column of your bill under Payment Options. The change affects only the address for mailing payments, not other correspondence.

If you use one of the common accounting software programs like Quicken to print checks, be sure to note the change in your program.



## Keep your cool in the heat



Summer's here! That means we need to be alert to the symptoms of heat stress. Heat stress, or hyperthermia, is most likely to occur in hot, humid weather when temperatures reach 90 degrees or above. Hyperthermia is especially dangerous for older adults, and may cause heat exhaustion, heat stroke, heart failure, or stroke. The use of prescription drugs for

high blood pressure, anxiety, depression, poor circulation, or sleeping can also make a person more vulnerable to the heat.

Seek medical help if you or a companion experiences any symptoms of heat stress, such as dizziness, rapid heartbeat, nausea, throbbing headache, dryness from lack of perspiration, mental changes or breathing problems.

Follow these tips to guard against heat stress this summer:

- Slow down and take frequent breaks. Physical activity produces body heat and overexertion adds to the heart's workload.
- Eat light and drink plenty of water. Avoid hot foods and heavy meals in hot weather.
- Dress for comfort. Wear light-colored, loose-fitting cotton clothes.
- Keep cool indoors during the hottest hours of the day. Cool off by taking a cool bath or shower.

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## Protecting your privacy

We want to protect your privacy and safety. That's why we need to verify that we're speaking with the right person before we discuss your account. When you call our DirectLink customer service, please be ready to verify your account information, such as your name, address, telephone number or social security number. This way, we ensure that only authorized individuals are able to make changes to your account, ask about payment history, or request service.

When you requested energy service at your home or business, you might not have provided us with a list of other people who are permitted to discuss your account. If the account is in your name, be sure to

provide us with the names of other household members or third parties who you want to be able to conduct business on your behalf. If the account is not in your name, but you need access to it, please ask the account holder to call us and authorize you first. This will prevent unauthorized persons from making changes to your account, and could save you time and energy in the future.

Also, be sure to keep your mailing address, phone number and any other account information current by letting us know when any changes occur. Simply check the box on the front of the payment coupon attached to your bill and provide the new information on the back.

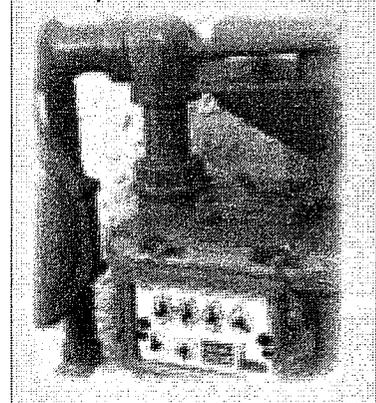
## Keep clear access to meters

If you don't have an automated meter reading device, be sure to keep clear access to your meter dials for our meter readers to get an accurate reading. While you're working on your lawn this summer, be sure to trim bushes and trees around the utility meters. And while you're shoveling snow this winter, be sure to clear snow and ice from the meters and service line connections for clear visibility.

If you're adding new plants to your landscape, be aware of their potential size and growth pattern. New plants placed close together might look great when they're still young, but can become a jungle as they grow.

Fencing can also make an attractive addition to your property, but be careful to keep the meter dials in easy sight if you try to camouflage meters and pipes.

Pets can prevent our meter readers from getting access to the meter, too. Note the date of your next scheduled meter reading on your monthly bill and be sure to keep pets restrained away from the path to the meter that day.



Printed on recycled paper.  
20% Post-Consumer Content

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Columbia Gas<sup>®</sup>  
of Pennsylvania  
A NiSource Company

# GasLines

**In this issue:**

- Your pipeline to the future
- Receive and pay your gas bill online free with CheckFree e-Bill
- Flooding can interrupt natural gas service
- Be alert to carbon monoxide's silent threat
- Your bill tracks temperatures and usage

[www.columbiagas.com](http://www.columbiagas.com)

AOL Keyword: Columbia Gas

Fall 2007

We Deliver News and Information to You

## Your pipeline to the future

Over the next two decades, Columbia Gas of Pennsylvania will invest more than \$60 million a year in our infrastructure as we build your pipeline to the future. Along the way, we'll be creating hundreds of family-sustaining jobs across Pennsylvania, helping the local economy and renewing communities.

We want to make certain that the communities we serve are provided safe, reliable delivery of their best energy value – natural gas – to support their growing needs. The men and women of Columbia Gas are your neighbors, and have serviced and maintained our network of pipelines and facilities well for many years. We've done all that we can to get the most efficient use from our current system. Now we need to be proactive in replacing and extending the natural gas infrastructure to better position communities for future growth and development.

Our investment supports a system-wide upgrade, designed to replace more than 2,400 miles of underground natural gas distribution lines and facilities that serve homes and businesses. We'll utilize state-of-the-art technologies involving plastic polyethylene gas lines and other advanced materials. These practices have set new, higher standards in the utility industry

over the last few decades and will last for generations. Since natural gas provides the safest and most economical energy choice for so many Americans, our investment truly represents your pipeline to the future.

You and others in your community will learn more about this major project in the coming months. Visit [www.columbiagas.com](http://www.columbiagas.com) for regular updates, and check your bill package often for more information.



## Receive and pay your gas bill online free with CheckFree e-Bill

Click – don't lick! Now you can pay your natural gas bills electronically for a faster, more convenient way to manage your account with just the click of a mouse. It's accurate, secure, and there's no transaction fee!

Offered in partnership with CheckFree Corporation, an industry leader in online billing and payment services, e-Bill lets you see an electronic image of your paper bill, with links to important information about your account, safety, and conservation. Instead of receiving a paper bill each month, you'll receive an e-mail when your gas bill is available.

To pay your e-Bill, you can also enroll in CheckFree's online pay-

ment service, or select any of the other payment options that we offer. Visit [www.columbiagas.com](http://www.columbiagas.com) and click on "Manage Your Home Account" to compare available payment options.

You can start our free e-Bill service today! With instant activation, you can view your most recent bill while you're online. There's no enrollment fee or waiting period for approvals.

Visit [www.columbiagas.com](http://www.columbiagas.com) and click on the e-Bill link to CheckFree's enrollment page. Once you sign up for e-Bill delivery, you'll receive just one last paper bill in the mail from us. You can print your e-Bill or store it in an electronic file for reference.

# Flooding can interrupt natural gas service



If you live in an area that is prone to flooding, be aware that floodwater can enter gas pipelines and create unsafe conditions. Follow these important steps to ensure the safety of your natural gas service lines and appliances.

## Before a potential flood

- Shut off the natural gas supply valve to appliances (usually found on the gas line to the appliance).
- Turn off electrical power to each appliance and leave it off.
- If a natural gas appliance is removed, cap or plug the open end of the pipe leading from the valve to the appliance to prevent

the backflow of floodwater into the gas piping.

## After a flood

- If water levels were high enough to cover the gas meter, call us to check your meter and regulator and to restore service.
- If flooding has been severe, gas appliances should not be used until a licensed plumber or contractor has inspected them.
- Damage could also occur to switches, controls, thermostats, furnace heat exchangers, and burner and pilot parts. A licensed plumber or contractor should perform any repair work.

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# Be alert to carbon monoxide's silent threat

When you seal your home against cold temperatures, be careful to avoid creating conditions that can produce carbon monoxide. Even though natural gas doesn't contain carbon monoxide, the colorless and odorless gas can be produced when there's not enough oxygen present for natural gas, oil, or any other fuel to burn properly.

Carbon monoxide gives no warning, but continued exposure can be extremely dangerous. A vehicle left idling in an enclosed garage can produce enough carbon monoxide to cause illness. In fact, more than two-thirds of accidental deaths from carbon monoxide are caused by poorly vented vehicle exhaust, and by coal, kerosene, or wood burned in a fireplace or stove that's not vented properly.

To guard against carbon monoxide, have your furnace and water heating system serviced regularly by a qualified heating contractor.



Proper adjustment and venting of equipment will help to ensure an adequate supply of fresh air for combustion. Carbon monoxide

detectors can alert you when the concentration of carbon monoxide in the air is above acceptable levels.

## Your bill tracks temperatures and usage

Your bill is a useful tool to track and understand the effect of weather on your gas usage and your total bill amount. Look under the Service Summary section of your monthly bill to compare usage and temperatures for the past 13 months. Besides showing how much energy you used and the number of days in each billing cycle, the information compares average temperatures and daily usage for the current period with those of the previous month and the same month last year.