



Washington Gas Energy Services

A Washington Gas Affiliated Company

13865 Sunrise Valley Drive
Suite 200
Herndon, VA 20171
P 703.793.7565
C 301.509.1508
F 703.793.7301

August 31, 2010

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Docket M-2010-2185981 Reply Comments of Washington Gas Energy Services, Inc.

Dear Secretary Chiavetta:

Pursuant to the Commission's July 15, 2010 Tentative Order regarding Interim Guidelines on Marketing and Sales Practices for Electric Generation Supplier and Natural Gas Suppliers, Washington Gas Energy Services, Inc., ("WGES") hereby submits the attached reply comments.

Please feel free to contact me at 703.793.7565 or via Email at lgibbons@wges.com if you have any questions or require additional information.

Sincerely,

Leah Gibbons
Director, Regulatory and Legislative Affairs

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Interim Guidelines on Marketing and Sales Practices	*	
For Electric Generation Suppliers and Natural Gas	*	M-2010-2185981
Suppliers	*	

Comments of Washington Gas Energy Services, Inc.

Pursuant to a Tentative Order issued on July 15, 2010 as part of Docket No. M-2009-20820421, the Pennsylvania Public Utility Commission (“Commission”) requested comments on proposed interim guidelines related to marketing and sales practices of Electric Generation Suppliers and Natural Gas Supplier. The Interim Guidelines were the result of a collaborative working group process conducted by the Office of Competitive Market Oversight (“OCMO”). Washington Gas Energy Service, Inc. (“WGES”) participated in the collaborative and offers these reply comments in direct response to the comments filed by Interstate Gas Supply, Inc. (“IGS”).

WGES has been offering electricity and natural gas service to residential, commercial, industrial, and government customers in the mid-Atlantic region for more than 13 years. WGES serves over 300,000 customers across Delaware, the District of Columbia, Maryland, Pennsylvania, and Virginia. Over this period, WGES has employed, among various other sales channels, door-to-door sales agents as an effective means of communicating with and enrolling residential and small commercial customers. In WGES’ experience, the door-to-door sales channel stands alone as the single most effective way to educate consumers about customer choice and the options available to them. Consumers have the ability to ask questions and learn about their options from a sales agent without having to leave their home or even pick up the phone.

WGES has concerns with the proposal put forward by IGS to impose additional licensing and certification for suppliers and their agents that engage in door to door solicitations. First, the proposal goes well beyond the discussions on marketing and sales guidelines in which WGES representatives participated. More importantly, the proposed additional certification and

licensing requirements would add unnecessary and duplicative burdens on suppliers, as many local jurisdictions impose permitting requirements for door to door solicitations and the existing consumer protection and licensing rules are sufficient to protect consumers. Electric Generation Suppliers licensed by the Commission are obligated to comply with all consumer protection laws and regulations, and as principals they are accountable for the conduct of their agents. The quality and scope of the proposed marketing and sales guidelines currently under consideration by the Commission are unmatched by any other jurisdiction and will provide further guidance to suppliers as they engage in their sales and marketing activities. As the Commission noted in its tentative order, the proposed guidelines are very detailed and address various issues that give rise to the need to issue guidance for these activities. As the Commission accurately notes, a number of the guidelines specifically apply to the suppliers' agents that go door-to-door, including those pertaining to background checks, training, appearance and identification, monitoring and quality control, and discipline. In addition, the guidelines address compliance issues including compliance with local ordinances that may restrict agent activities and agent-customer interactions. WGES fully supports the proposed guidelines and believes that they will serve as a strong guidepost for suppliers and their agents to curb questionable supplier and/or agent behavior and to protect consumers.

A handwritten signature in black ink that reads "Leah Gibbons". The signature is written in a cursive, flowing style.

Leah Gibbons
Director, Regulatory and Legislative Affairs