

PENNSYLVANIA ENERGY MARKETERS COALITION

June 16, 2011

Rosemary Chiavetta, Secretary
Secretary's Bureau
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

Dear Secretary Chiavetta:

Please find enclosed the Comments of the Pennsylvania Energy Marketers Coalition regarding the revised final rulemaking order on the relationships between Natural Gas Distribution Companies ("NGDCs") and Natural Gas Suppliers ("NGSs") which sell, or seek to sell natural gas to end users on NGDC distribution systems (Docket No. L-2008-2069114).

Please do not hesitate to contact me with any questions or concerns regarding our Comments.

Sincerely,



Frank Caliva, III

Regulatory Consultant
Pennsylvania Energy Marketers Coalition (PEMC)

Senior Consultant, Public Affairs &
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Strategic Communications, LLC
3532 James Street, Suite 106
Syracuse, New York 13206

Enclosures

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Natural Gas Distribution Companies and)
Promotion of Competitive Retail Markets) Docket No. L-2008-2069114

**COMMENTS OF THE PENNSYLVANIA ENERGY MARKETERS COALITION:
INCLUDING AGWAY ENERGY SERVICES, LLC, GATEWAY ENERGY SERVICES
CORPORATION, ENERGY PLUS HOLDINGS LLC, INTERSTATE GAS SUPPLY,
INC., PA GAS & ELECTRIC, AND VECTREN RETAIL, LLC**

On January 13, 2011, the Public Utility Commission ("PUC," or "Commission") issued a final rulemaking order regarding the relationships between Natural Gas Distribution Companies ("NGDCs") and Natural Gas Suppliers ("NGSs") which sell, or seek to sell natural gas to end users on NGDC distribution systems. This rulemaking was initiated on March 27, 2009, and has been advanced at this time with significant changes to comply with the Commission's intention to remove barriers to retail competition in the natural gas market throughout the Commonwealth.¹ Based upon initial feedback from the Independent Regulatory Review Commission ("IRRC") in May 2011, the PUC voluntarily withdrew this rulemaking in order to make revisions. On June 9, 2011, the Commission published the revised Annex A, to provide clarification on a number of technical and definitional issues, and is seeking Comments on these changes.

As independent natural gas suppliers, Agway Energy Services, LLC ("Agway"), Gateway Energy Services Corporation ("Gateway"), Energy Plus Holdings LLC ("Energy Plus"), Interstate Gas Supply, Inc. ("IGS"), Pennsylvania Gas & Electric ("PAG&E"), and Vectren Retail, LLC ("Vectren"), known separately and together for purposes of this filing as the Pennsylvania Energy Marketers Coalition ("PEMC")², collectively appreciate the opportunity to comment on the revised Annex A issued by the Commission.

The PEMC strongly supports these technical corrections, and looks forward to the swift approval of the revised rulemaking order by both the Commission and the IRRC.

To that end, PEMC would recommend the Commission consider only those Comments filed in response to these technical corrections which are germane to the changes outlined in the Secretarial Letter of June 9, and included in the revised Annex A. Considering Comments outside the scope of these

¹ Docket No. L-2008-2069114/57-269, in accordance with 52 PA. Code Ch. 62, published 39 Pa.B 3461, July 11, 2009.

² This group of energy marketers, which supply natural gas, electricity, and various other energy services to residential and commercial customers across a large number of utility markets throughout several states, works together collaboratively on non-competitive, regulatory issues to advance competitive markets and consumer choice.

specific revisions will unnecessarily prolong this rulemaking and delay the regulatory certainty that the final order will provide, to the detriment of natural gas retail competition.

Pennsylvania has completed the first phase of building a truly competitive energy market, but now is an ideal opportunity to accelerate the market's further transformation. It is critical that this policy momentum continue in order to enable the competitive marketplace to continue its steady growth and to provide price protection, expanded services, energy efficiency, and environmentally-friendly offerings to the people of the Commonwealth. The Commission is to be commended for its strong commitment and decisive efforts to strength natural gas retail competition in the Commonwealth.

June 16, 2011

Respectfully submitted,



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cc: Pennsylvania Energy Marketers Coalition (PEMC)

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