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October 26, 2012

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Interim Guidelines for Natural Gas Distribution Company Eligible Customer Lists
Docket No. M-2012-2324075**

Dear Secretary Chiavetta:

Enclosed for filing are the Comments of Washington Gas Energy Services, Inc. in the above-captioned docket.

If you have any questions, please do not hesitate to contact me. Thank you.

Best Regards,

STEVENS & LEE


Michael A. Gruin

Encl.

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Interim Guidelines for Natural
Gas Distribution Company
Eligible Customer Lists

Docket No. M-2012-2324075

**COMMENTS OF
WASHINGTON GAS ENERGY SERVICES, INC.**

Washington Gas Energy Services, Inc. (“WGES”) provides these comments in response to the Tentative Order issued on September 27, 2012 (“Tentative Order”) in the above-captioned docket, which seeks comments on the draft interim guidelines for Eligible Customer Lists (“ECLs”) to provide more uniformity in the customer account information provided by Natural Gas Distribution Companies (“NGDCs”) to Natural Gas Suppliers (“NGSs”).

WGES is a licensed NGS in the Commonwealth of Pennsylvania in the territories of Columbia Gas, PECO, UGI Utilities, UGI Central Penn Gas and UGI Penn Natural Gas. As a supplier actively competing for customers in Pennsylvania, WGES can unequivocally state that the provision of ECLs is critical to a fully functioning competitive market. For that reason, WGES applauds the Commission for reiterating the policy that licensed competitive suppliers must be given access to NGDC customer lists.

With respect to the ten data points proposed by the Commission for natural gas eligible customer lists, WGES supports the inclusion of all ten data points. In the view of WGES, all ten proposed data points are vital to suppliers and provide the minimum information necessary to compete for customers’ business.

WGES believes, however, that several additional data points would be very useful to NGSs to more accurately price their offers and ultimately better serve Pennsylvania gas customers. These additional proposed data points are set forth below:

1. Peak Demand CCF: Some NGDCs base their capacity assignment to NGSs on “Peak Demand CCF”, which is a metric for calculating the most gas that a customer could possibly use in a given day. Capacity can be very expensive for NGSs, so knowing customers’ Peak Demand CCF will limit NGSs’ risk and allow for better pricing of gas service to customers. Peak Demand CCF is a metric that is tracked by NGDCs, and to the extent available, this information should be included in ECLs. This metric is analogous to the “Transmission/Capacity Obligation” data point that was required in the *Electric ECL Order*.
2. Base Factor and Use Factor: The Base Factor is the amount of gas a customer uses each day of the year regardless of temperature. The Use Factor is the amount of gas a customer uses per each “heating degree day” (“HDD”). HDD is calculated as 65 degrees minus the average daily temperature. These two Factors allow suppliers to predict a customer’s usage on a given date. To do this, the Base Factor is added to the sum of the Use Factor and number of HDDs. Most, if not all, NGDCs have Base Factor and Use Factors information that could be easily included in ECLs.

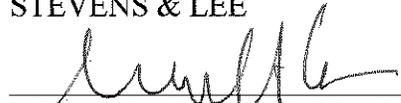
With respect to the issue of customers’ ability to restrict the release of their account information, WGES submits that there is no basis to deviate from the Commission’s conclusions in the *Electric ECL Order*. Enabling all customers to restrict all their information from appearing on an ECL, coupled with the retention of the well-established opt-out process, would be in the public interest and reflect sound policy. This method strikes the right balance. It

respects the privacy of customers, allows endangered persons (i.e. victims of domestic abuse) to act on their personal safety concerns without having to undergo an identification process yet it increases the likelihood that all customers will have an opportunity to receive energy savings offers from NGSs.

WGES appreciates the opportunity to present these comments on this important issue and commends the Commission for its work on developing uniform state-wide guidelines for ECLs.

Respectfully Submitted

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