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June 16, 2014

Via Hand Delivery

Rosemary Chiavetta, Secretary
PA Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

L-2014-2409385

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2014 JUN 16 PM 2:59
PA PUB
SECRETARY'S BUREAU

Re: Request for Clarification on Notice Timeline Requirements for
Combined Electricity and Natural Gas Disclosure Statements

Dear Secretary Chiavetta:

On behalf of Independence Energy Group LLC d/b/a Energy Rewards ("Energy Rewards") this letter sets forth a request for clarification of the notice requirements applicable to electric and natural gas suppliers. Energy Rewards is licensed by the Public Utility Commission ("Commission") to serve both electricity and natural gas customers in the Commonwealth (License Nos. A-2011-2262337 and A-2013-2396449). Energy Rewards sells electricity only products, natural gas only products, and combined electricity and natural gas products. In preparing contract documents for its combined electricity and natural gas product offers, Energy Rewards became aware of an inconsistency in the Commission's current notice provision requirements for these two commodities that has raised a compliance concern.

Specifically, the notice provisions in 52 Pa. Code § 62.75.(g)(1) require two notices to be sent – one at 90 days and the second at 60 days – prior to the expiration of a natural gas contract to explain the customer's contract renewal options. In contrast, the Commission's recently adopted rules in docket L-2014-2409385 (52 Pa. Code § 54.10.(a)(1) and (2)) require an initial notice to be sent 45-60 days prior to contract expiration and an options notice to be sent at least 30 days prior to contract expiration.

In trying to comply with all of these notice timeline requirements, Energy Rewards is concerned that sending four notices to a customer taking service under a combined electricity and natural gas contract will cause unnecessary confusion and result in a poor shopping experience for the customer. As such, Energy Rewards would like to minimize customer confusion by sending notices to customers taking combined electricity and natural gas service from Energy Rewards in accordance with the contract expiration notice timeline provisions included in Section 54.10 (a) (1) and (2) for its combined electricity and natural gas service contracts. Energy Rewards submits that the use of only the electric notice timeframe provision is reasonable, and will likely encourage customers taking combined service to not delay in making an affirmative choice to

either remain with Energy Rewards, switch to one or more competitive suppliers or return to default service.

Accordingly, Energy Rewards seeks clarification that compliance with the notice timeline requirements in Section 54.10(a)(1) and (2) for customers taking competitive service under a combined electricity and natural gas service contract will not be considered to be a violation of Section 62.75(g)(1).

Please feel free to contact either me or Leah Gibbons (at 301.509.1508 or via Email at leah.gibbons@nrgenergy.com) if you have any questions or require additional information. In addition, please let us know if we should serve this letter on any other entities.

Sincerely,



Daniel Clearfield
DC/lww

cc: Office of Competitive Market Oversight via email
Kirk House via email

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