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October 14, 2014

Via E-Filing and Overnight Mail

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

**Re: Investigation of Pennsylvania's Retail Natural Gas Supply Market;
Docket No. I-2013-2381742**

Dear Secretary Chiavetta:

Enclosed for filing please find the comments of UGI Energy Services, LLC to the Commission's Order entered September 12, 2013 in the above-captioned proceeding. Should you have any questions concerning this submission, please feel free to contact me at (610) 992-3203.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "Danielle Jouenne", written in a cursive style.

Danielle Jouenne
Counsel for UGI Energy Services, LLC

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

INVESTIGATION OF :
PENNSYLVANIA'S RETAIL NATURAL : Docket No: I-2013-2381742
GAS SUPPLY MARKET :
:

Comments of UGI Energy Services, LLC

The PUC issued an order on September 12, 2013 to investigate the current status and effectiveness of the Retail Gas and Electric Supply markets in Pennsylvania. As part of that order, additional comments on new issues (not previously discussed) were requested by October 14, 2014.

By way of introduction, UGI Energy Services, LLC (“UGIES”) is the midstream and retail marketing subsidiary of UGI Corporation. It was formed in 1995 to pursue the opportunities created by federal and state deregulation of electricity and natural gas commodity supply markets, direct access, and customer choice. UGIES is a natural gas supplier (“NGS”) and electric generation supplier (“EGS”) that sells electricity, natural gas, liquid fuels, and renewable energy products to commercial and industrial customers at approximately 30,000 locations behind thirty-six (36) natural gas utility systems and twenty (20) electric utility systems in all or portions of Maryland, Delaware, Massachusetts, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Virginia and the District of Columbia, and speaks from experience in responding to the questions set forth in this investigation.

UGIES supports the Commission’s efforts to broadly examine possible solutions to increase the effectiveness of the retail choice markets while ensuring appropriate protection of such customers. UGIES fully believes retail markets function at their best when customers are provided accurate, timely and relevant information, thus enabling them to make affirmative and informed choices to fulfill their energy commodity needs. The identification and implementation of retail markets enhancements that align with and achieve such market attributes will lead to more choice overall and lower prices for consumers.

UGIES hereby respectfully submits these comments in response to the items set forth and discussed as part of this order.

- **Accelerated Switching**

UGIES notes that, in general, Accelerated Switching for electric choice is less complicated than for natural gas choice. That given, UGIES is supportive of the development of a workable solution for Accelerated Switching for aggregated supply, monthly balanced natural gas customers. This change would support competition as well as eliminate the frustration these customers experience due to the up to 45-day waiting period between when a customer makes a choice to switch the supplier of his natural gas and when that switch is effective. However, UGIES believes that Accelerated Switching for daily balanced customers would create more issues than it would resolve due to the complications associated with the NGSs liquidating the unused supply that the customer has contracted for, as well as complications with NGDC imbalance and cash-out procedures. Finally, while UGIES is supportive of development of a workable solution for Accelerated Switching for aggregated supply, monthly balanced natural gas customers, UGIES believes that, as Accelerated Switching for electric is to begin this December, it might make sense to address the issue of Accelerated Switching for natural gas after Accelerated Switching for electric has been in place for at least one winter season, to see what if any unanticipated complications might arise.

- **Purchase of Receivables**

UGIES supports a standardization of bill formats of Rate Ready or Bill Ready across PA NGDC as well as utility billing. However, the Purchase of Receivable (“POR”) percentage should continue to remain individual to each NGDC based on the current tariff calculations as this best reflects the actual uncollectable accounts experienced for the specific service territory covered by each NGDC.

- **Disclosure Requirements**

As with Power, UGIES supports disclosure of Natural Gas historic variable rate pricing for specific rate classes- Residential and Small Business customers. Pricing should be an average across the rate class, not specific to an individual account. 12-24 month rolling historic pricing available on supplier websites with monthly updates required would be the preferred method of communicating these statistics.

UGIES supports the Commission’s suggestion for NGSs to provide customers with a contract summary page, similar to Power. We have found that this provides a quick reference to customers and has served to initiate positive increased communication between us and our customers.

- **Expanded Consumer Education, New Supplier Bill Format, Account Number Access Mechanisms**

UGIES fully supports the Commission's activities designed to increase consumer awareness, to provide greater contract transparency through the use of the new Supplier Bill Format currently being implemented for Power. UGIES also supports allowing increased marketing opportunity for customers in public forums, with the right privacy protections in place. In addition, UGIES applauds the Commission's forward look at PAGasSwitch.com to make it a more user friendly tool for all shopping Natural Gas customers.

UGIES appreciates the Commission's continuing efforts to support retail markets in Pennsylvania and looks forward to working with the Commission to realize the many opportunities that retail energy choice provides to its citizens.

Respectfully Submitted,



Danielle Jouenne
Counsel for UGI Energy Services

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