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February 2, 2015

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

VIA ELECTRONIC FILING

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

Dear Secretary Chiavetta:

Enclosed please find the Comments of Valley Energy, Inc. regarding the above-referenced proceeding.

Sincerely,

McNEES WALLACE & NURICK LLC

By

A handwritten signature in black ink, appearing to be 'E. Trinkle', written over a horizontal line.

Elizabeth P. Trinkle

Counsel to Valley Energy, Inc.

EPT/emp
Enclosure

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation of Pennsylvania's
Retail Natural Gas Supply Market

Docket No. I-2013-2381742

COMMENTS OF VALLEY ENERGY, INC.

On December 18, 2014, the Pennsylvania Public Utility Commission ("PUC" or "Commission") issued its Final Order outlining the Commission's priorities and finalizing specific action plans for the PUC's formal investigation into the current status of Pennsylvania's retail natural gas market.¹ The Final Order requests Comments, in relevant part, regarding development of an account number access mechanism for the natural gas industry. Specifically, the Commission requests Comments on the appropriate technological platform to be used; the requisite security measures needed to protect consumer privacy; and the capabilities of the mechanism to track users and retain records.² In accordance with the Commission's established schedule, Valley Energy, Inc. ("Valley" or "Company") submits these Comments.

As one of the smaller jurisdictional natural gas distribution companies ("NGDCs") in Pennsylvania, Valley submits that each NGDC should have the flexibility to develop its own procedures to provide natural gas suppliers ("NGSs") with account numbers for customers that want to switch to an NGS. Larger NGDCs may prefer to address such requests through Electronic Data Exchange ("EDI") while smaller NGDCs similarly situated to Valley may prefer to process requests through their call centers. Valley has not implemented EDI technology in

¹ *Investigation of Pennsylvania's Retail Natural Gas Supply Market*, Docket No. I-2013-2381742, Final Order (Dec. 18, 2014) ("Final Order").

² *See id.* at 44-45.

light of the Company's limited customer base and small service territory. Accordingly, any guidelines adopted by the Commission with respect to account number access mechanisms should be straight-forward, easy to apply and flexible.

WHEREFORE, Valley Energy, Inc. respectfully requests that the Pennsylvania Public Utility Commission consider and adopt these Comments.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: February 2, 2015