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March 2, 2015

VIA E-MAIL

Pennsylvania Public Utility Commission
Office of Competitive Oversight
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

M-2015-2474802

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SECRETARY'S BUREAU

**Re: Investigation of Pennsylvania's Retail Natural Gas Supply Market,
Docket No. I-2013-2381742 (December 18, 2014) – Informal Comments
of the Retail Energy Supply Association**

Dear Office of Competitive Market Oversight:

In its December 18, 2014 Order setting out a schedule of retail gas supply issues and a timetable for addressing those issues, the Pennsylvania Public Utility Commission (“Commission”) requested informal comments from interested parties regarding the joint NGDC-NGS consolidated bill. Specifically, the Commission noted that a joint Natural Gas Distribution Company-Natural Gas Supplier (“NGDC-NGS”) bill may provide customers with an increased recognition of their suppliers, as well as aid in the development of the relationship between those two parties. Order at 42. Accordingly, it directed the Office of Competitive Market Oversight (“OCMO”) to develop recommendations for improvement of the NGDC-NGS joint bill no later than the second quarter of 2015. *Id.* Interested stakeholders were directed to submit to OCMO their informal comments regarding supplier-related elements of the bill and new requirements that would be appropriate for inclusion on the consolidated bill. *Id.* The informal comments were to be submitted no later than February 28, 2015.¹

The Retail Energy Supply Association (“RESA”) is an interested stakeholder in the NGDC-NGS joint bill.² Accordingly, RESA submits the following informal comments on requirements that should be incorporated into the NGDC-NGS joint bill.

¹ February 28, 2015 falls on a Saturday, therefore pursuant to Commission regulations the informal comments are due on Monday, March 2, 2015. 52 Pa. Code §1.12.

² RESA’s members include: AEP Energy, Inc.; Champion Energy Services, LLC; Consolidated Edison Solutions, Inc.; Constellation NewEnergy, Inc.; Direct Energy Services, LLC; Dynegy Energy Services; GDF SUEZ Energy Resources NA, Inc.; IDT Energy, Inc.; Interstate Gas Supply, Inc. dba IGS Energy; Just Energy; Liberty Power; MC Squared Energy Services, LLC; Mint Energy, LLC; NextEra Energy Services; Noble Americas Energy Solutions LLC; Nordic Energy Services, LLC;

NGS Logo – Bill Messaging Space – Shopping Box Information

Several well-recognized improvements to a joint utility supplier bill that are easily transferrable as concepts to the NGDC-NGS joint bill have already been adopted by the Commission. In its final order in the Investigation of Pennsylvania's Retail Electricity Market: Joint Electric Distribution Company-Electric Generation Supplier Bill, Docket No. M-2014-2401345, the Commission ordered that a competitive supplier could elect to have its logo included in the bill, made provision for a Bill Messaging Space to be available to the supplier and provided for a Shopping Information Box on the bill. RESA supports adopting all of these joint bill improvements on the NGDC-NGS joint bill.

As is the case for the electricity joint bill, where the NGS elects to have its logo on the bill, RESA supports the NGDC having reasonable discretion in deciding its exact location on the bill. However, the NGDC's proposed placement of the logo, as well as whether it is in color or black and white should be subject to OCMO's review and approval.

At least four lines of NGS bill messaging space should be made available and NGSs should be given discretion as to the substance of the messages. Such discretion is important because messaging needs can change and evolve over time, and suppliers should not be locked into always providing the same specific types of information.

A Shopping Information Box that reminds the customer they can shop for their gas supply, and includes the customer's account number and current rate schedule, should be also be included in the bill. The print for this Box should be conspicuous and separate from the customer's monthly charges. As is the case with respect to logo placement, drafts of an NGDC's Shopping Information Box should be provided to OCMO for review.

In addition, NGA and NGDC rates should be stated on the same dollar/cents and measurement unit basis for customer clarity.

Bill Inserts

RESA supports the availability of bill inserts to NGSs. Some reasonable allocation of bill insert space should be made to suppliers. NGDCs should be required to propose for OCMO's review some allocation of available inserts and a schedule for NGS use of those bill inserts.

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Products and Services Included on the Bill

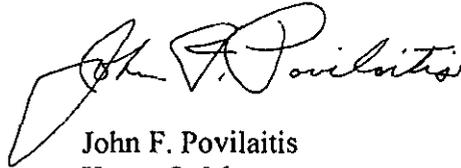
The Commission should require that provision be made in the NGDC-NGS joint bill for the billing of supplier products and services in addition to gas supply. By restricting billing options only to gas supply, the creativity and choices that suppliers could bring to the table as new customer offerings is languishing. In order to achieve more of the market potential that NGSs can provide to customers, they must be able to include in the bill non-gas supply items such as special offers, efficiency-related services and discounts. There are certainly regulatory issues to be worked out to accomplish this improvement, but some tangible progress must be made in this direction. Issues such as dealing with partial customer payments and service termination issues can and should be addressed.

Cost of Joint Bill Improvements

Any NGDC that determines the costs of the Commission required NGDC-NGS joint bill improvements will have a material effect on its financial condition should be permitted to propose to the Commission a specific cost recovery mechanism, including requested cost deferrals, that will be reviewed and acted on in an expedited proceeding.

RESA respectfully requests that the foregoing recommended NGDC-NGS joint bill improvements be adopted and implemented.

Very truly yours,



John F. Povilaitis
Karen O. Moury
Counsel for the Retail Energy Supply
Association

JFP/KOM:bb