

Date: February 27, 2015

From: David Lahoff (dlahoff@ugi.com)

To: ra-OCMO@pa.gov

M-2015-2474802

RECEIVED
2015 APR 10 AM 9:31
PA.P.U.C.
SECRETARY'S BUREAU

**UGI DISTRIBUTION COMPANY
INFORMAL COMMENTS CONCERNING
ENHANCED MARKETER ACCESS TO BILLS
Docket No. I-2013-2381742**

The UGI Distribution Companies, comprised for purposes of these comments of UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc., submit these informal comments in response to ordering paragraph 5 of the Commission’s Final Order entered at the above docket on December 18, 2014. These informal comments are meant to supplement the informal comments filed by the Energy Association of Pennsylvania (“EAP”), which the UGI Distribution Companies support fully.

The UGI Distribution Companies can accommodate black and white marketer logos on its paper bills at an initial set-up charge of approximately \$4,000 per logo. The UGI bill printing process is only capable of printing in black and white. The areas of the bill that do contain color are part of the pre-formatted bill stock that is used in the printing process. Since the supplier logo could change, it cannot be part of the pre-existing bill format. The UGI Distribution Companies could also accommodate the Shopping Box, but the space required for both the Shopping Box and the supplier logo is likely to require the use of a two-page bill at an estimated cost of \$0.047 per bill. There should be no cost impact associated with these changes for electronic bills.

With respect to customer messaging, existing systems could accommodate messaging directed to all marketer customers provided it is submitted with sufficient time in advance of the printing of bills to permit adjustments to bill layout and the potential switch to a two-page bill,

but existing systems could not accommodate differing messaging to differing subsets of marketer customers or rapid changes in message content because of the required layout and preparation time.

UGI Utilities, Inc. – Electric Division is on track to meet the June 2015 implementation deadline for providing enhanced marketer access to its bills, but currently only has three marketers participating in its consolidated bill program and only one of those is serving the residential market. Implementation of enhanced marketer access to consolidated bills for the UGI Distribution Companies could potentially involve a significant number of bills given the more active retail markets on its systems. The UGI Distribution Companies accordingly support the one-year implementation period suggested in the EAP comments.

The UGI Distribution Companies also oppose the inclusion of marketer bill inserts at this time. Natural gas distribution companies are required to include bill inserts addressing rate filings, safety, customer rights and other matters, and these messages could be diluted or ignored if marketer bill inserts were required. Also, such inserts would lead to increased postage and printing costs, and could require changes in billing envelopes and insertion machinery which could lead to even greater costs.

The UGI Distribution companies assume the Commission will, as it did in the Electric RMI proceeding, provide for full cost recovery from all customers of NGDC implementation costs. Since this cost recovery mechanism places no costs on participating marketers, disagreements may occur over requests for costly additions to customer bills. The Commission should accordingly establish a timely procedure for resolving such potential disputes.

Similarly, it is possible that marketer bill messaging could contain what appears to be inaccurate or inappropriate information. The Commission should establish a mechanism for

reviewing potentially inaccurate or inappropriate communications and should provide NGDCs with the option of including disclaimer statements on their bills and recovering associated costs through their cost recovery mechanism.