

# John J. Gallagher

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**May 25, 2015**

*Via electronic filing*

Hon. Rosemary Chiavetta, Secretary  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Room-N201  
Harrisburg, Pennsylvania 17120

**Re: Docket No. M-2015-2468991 – Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers**

Dear Secretary Chiavetta:

In accordance with the Tentative Order entered on April 9, 2015 under the above-referenced docket number (“Order”), Pike County Light & Power Company (“PCL&P” or the “Company”) hereby submits the comments set forth below.

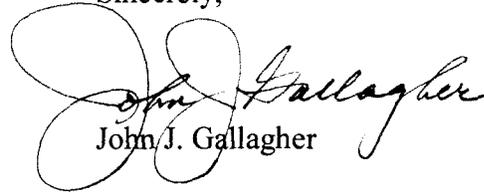
PCL&P is a small natural gas distribution company (“NGDC”) with approximately 1,200 residential and commercial customers. Because its gross intrastate annual operating revenues are less than \$40 million, PCL&P is not subject to the obligations of 66 Pa. C.S. § 1307(f). Currently, there are no natural gas suppliers (“NGS”) offering service in PCL&P’s service territory.

PCL&P agrees with the Commission that “it may be appropriate to exempt smaller NGDCs from the account number access mechanism requirement due to the costs and relatively small customer bases.” (Order, p. 18) The costs that PCL&P would incur to implement in its service territory the customer account number access mechanism described in the Order would not be justified, given the Company’s small customer base and the absence of any NGS options for customers. The Commission relied on similar arguments when it exempted PCL&P from analogous account number access requirements applied to most electric distribution companies. Therefore, PCL&P supports the Commission’s proposal to exempt NGDCs that are not subject to 1307(f) obligations from the Order’s requirement to develop account number access mechanisms.

In the event that NGS options do become available in the Company’s service territory, PCL&P proposes to provide access to gas account numbers using the same mechanism it currently employs to provide access to customers’ electric account numbers. PCL&P’s Voice Response Unit (“VRU”) currently provides a PCL&P account number to any customer who enters his or her social security number into the VRU, as long as that customer has previously provided his or her social security number to PCL&P. The Company maintains this toll-free, dedicated telephone number to provide immediate access to the customer’s PCL&P account number. This tool is available currently to all gas and electric customers of PCL&P who have previously provided his or her social security number to the Company.

Thank you for your attention to this matter. Please contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Gallagher". The signature is fluid and cursive, with the first name "John" and last name "Gallagher" clearly legible. The signature is positioned above the printed name.

John J. Gallagher