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May 26, 2015

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

**VIA ELECTRONIC FILING**

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

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 'Elizabeth P. Trinkle', written over a horizontal line.

Elizabeth P. Trinkle

Counsel to Valley Energy, Inc.

EPT/sar  
Enclosure

c: Megan Good (via e-mail)  
Ken Stark (via e-mail)

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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Natural Gas Distribution Company Customer  
Account Number Access Mechanism for  
Natural Gas Suppliers

Docket No. M-2015-2468991

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**COMMENTS OF VALLEY ENERGY, INC.**

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On April 9, 2015, the Pennsylvania Public Utility Commission ("PUC" or "Commission") issued its Tentative Order proposing a mechanism facilitating natural gas suppliers' ("NGSs") access to natural gas distribution company ("NGDC") customer account numbers with the account is not available from either the customer or from the Eligible Customer List ("ECL").<sup>1</sup> In accordance with the Commission's established schedule, Valley Energy, Inc. ("Valley" or "Company") submits these Comments.

The Commission proposes that NGDCs develop a passcode-protected secure website portal that will allow NGSs to access customer account numbers for all NGDC rate classes for those accounts not available on the NGDC's ECL.<sup>2</sup> The portal would require an NGS to submit the customer's full name, service street address and five-digit postal code, and would document the NGS's attestation that the customer is enrolling in a public location, has provided photo identification and has provided a signed letter of authorization ("LOA") prior to the NGS accessing the system.<sup>3</sup> The PUC further proposes that the mechanism keep track of portal usage and that NGDCs retain this information for three years.<sup>4</sup> Finally, the Commission proposes that

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<sup>1</sup> *Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers*, Docket No. M-2015-2468991, Tentative Order (Apr. 9, 2015).

<sup>2</sup> *See id.* at 11.

<sup>3</sup> *See id.* at 13-15.

<sup>4</sup> *See id.* at 15.

"only those NGDCs with 1307(f) obligations bet required to develop account number access mechanism. 66 Pa. C.S. § 1307(f)(1)."<sup>5</sup>

As one of the smaller jurisdictional NGDCs in Pennsylvania, Valley supports the Commission's proposal to exempt small NGDCs from the account number access mechanism requirement. The Commission has wisely recognized that an exemption for those NGDCs without Section 1307(f) obligations is appropriate in light of the significant cost impact to customers to implement such a mechanism. As Valley noted in its February 2, 2015 Comments, the Company has not implemented Electronic Data Interchange ("EDI") technology in light of its limited customer base and small service territory.<sup>6</sup> As such, processing all requests through the Company's call center is the most straightforward and cost-effective way for NGSs to access Valley's customer account numbers at this time.

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<sup>5</sup> *Id.* at 18.

<sup>6</sup> See *Investigation of Pennsylvania's Retail Natural Gas Supply Market*, Docket No. I-2013-2381742, Comments of Valley Energy, Inc. (Feb. 2, 2015).

**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: May 26, 2015