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Via Overnight Delivery

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MAY 26 2015

May 26, 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

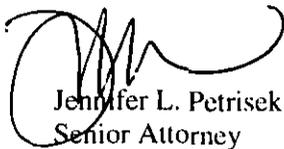
Re: Docket No. M-2015-2468991 – Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers

Dear Secretary Chiavetta:

On behalf of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively “Peoples” or the “Company”), attached for filing are the Comments of Peoples to the Tentative Order issued by the Pennsylvania Public Utility Commission on April 23, 2015 in Docket Number M-2015-2468991 - Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers.

Please contact the undersigned at (412) 208-6834 should you have any questions or concerns regarding this matter.

Very truly yours,



Jennifer L. Petrisek
Senior Attorney

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

M-2015-2468991

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COMMENTS TO THE TENTATIVE ORDER
BY PEOPLES NATURAL GAS COMPANY LLC, PEOPLES NATURAL GAS COMPANY LLC
- EQUITABLE DIVISION AND PEOPLES TWP LLC

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

I. Introduction.

On April 9, 2015, the Pennsylvania Public Utility Commission ("PUC" or "Commission") issued its Tentative Order proposing a mechanism which would facilitate natural gas suppliers' ("NGSs") access to natural gas distribution company ("NGDC") ratepayer account numbers when the account number is not available from either the ratepayer or from the Eligible Customer List ("ECL"). In accordance with the forty-five day comment period, Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively the "Company" or "Peoples") respectfully submit these comments for consideration by the Commission. The Company expects that the Energy Association of Pennsylvania ("EAP") will also file comments in this proceeding, on behalf of its natural gas distribution company members. The Company has previewed the EAP comments and supports the suggestions and analysis in those comments. The Company's comments today are in addition to those submitted by EAP.

II. Company Response to Commission Proposal.

In the Tentative Order, the Commission has set forth a proposed manner by which NGS' may access ratepayer account numbers – the proposal also includes various steps to protect ratepayer privacy and to protect ratepayer information from unauthorized release. The Commission seeks input from the NGDC's as to the feasibility of the proposal, along with estimated costs for implementation and maintenance of the proposed method by which NGS' could access ratepayer account numbers. The Company provides the following information in response to the proposal and the Commission's requests for further information.

A. Secure Portal.

In the Tentative Order, the Commission proposes the use of a passcode-protected web-portal, which facilitates the enrollment of customers in a public venue. The Commission further proposes that the web-portal would require, at a minimum, the input of a username and password in order for a NGS to access any information. The Company supports the use of a secure portal by which an NGS would access residential ratepayer account numbers while soliciting customers in a public venue forum and has evaluated the capability of creating a web-portal for these new purposes. The costs associated with creating and maintaining the web-portal are provided later in these Comments.

The Company believes it is important to ensure there are specific NGS usernames and passwords for access to the web-portal. The Company will create an administrative environment for each specific NGS. The specific NGS would be responsible for administering usernames and passwords for their access.. The NGS would be solely responsible for the protection of those usernames and passwords to ensure there is no unauthorized access by any individuals. The NGS should implement policies and practices to ensure current employees are trained in the importance of protecting the usernames and passwords, restricting use to only those employees who require access, and ensuring usernames and passwords for individuals no longer employed are cancelled.

Further, the Company will require that usernames and password creation is in compliance with its existing security practices and policies, which are based on best industry practices.. For example, passwords may (1) require unique characters, such as symbols, capital letters, numbers, and minimum character counts, (2) have time limitations which require re-setting the password on a regular basis (for example, every 6 months), and (3) become locked if an incorrect username/password combination is entered a specific number of times. The Company does not believe these security measures are unduly burdensome to the NGS and are instead in the best interest of protecting ratepayer information, as well as the integrity of the Company's computer systems.

B. Customer Information Inputs.

The Commission has proposed that the web-portal would require the following data points to be input in order for the system to capture the proper ratepayer account number: 1) the customer's full name, 2) service street address and 3) postal code. The Company can design the web-portal to require these three data inputs in order to capture the ratepayer's account number. The Company notes that exact matches will be necessary in order for the system to generate a response of a ratepayer's account number and encourages the NGS to ensure they are capturing specific and accurate information from the customer. For example, an account listed solely in the name of "Jane Doe" will not be captured if the NGS requests the account number listing the spouse "Bob Doe" as the ratepayer. As the Company

recognizes that the customer may provide information to the NGS which does not exactly match the information contained in the Company's systems, the Company will permit the NGS to re-enter the specific customer's information multiple times in order to obtain the ratepayer's account number.

It is important to note that the Company interprets the Commission's proposal to include only the account numbers associated with residential and small business classes of ratepayers and has based its initial design estimates only on these two classes of ratepayers. As the web-portal is designed for public venue marketing, and not phone, mail, direct door-to-door, or business-to-business solicitations, the Company interprets the intended recipients of the public venue marketing to be residential ratepayers and possibly small business ratepayers. These are also the ratepayers that would choose to be added to, or removed from, the ECL.

C. Customer Protections.

In the Tentative Order, the Commission recognizes the protection of consumer information is of *paramount importance*. In order to protect consumers while still allowing for a safe and user-friendly retail marketplace, the Commission has proposed to utilize the account number access mechanisms already utilized in the electric markets. Specifically the Commission proposed that the web-portal require three attestations from the NGS before the ratepayer account number will be released. The three attestations are: (1) NGS attestation that the customer signed an LOA, (2) NGS attestations that the customer provided a government-issued or alternative photo identification and (3) NGS attestation that the web-portal is being used in connection with marketing in a public venue. The Company supports the inclusion of all three attestations in the design of the web-portal and the costs associated with these protections are provided later in these Comments.

While the Company will require these attestations, and keep record of the attestations in the web-portal system, the Company should not be responsible for verifying the individual attestations (for example, by requiring the NGS to provide copies of the LOA) or policing whether an NGS' attestations are accurate and valid. The Company's design considerations and cost estimation do not include any verification duties as those powers belong to the Commission and law enforcement agencies. Certainly, however, the Company will retain record of the attestations and will assist the Commission and law enforcement agencies, if ever necessary, by providing system reports of the attestations.

D. Record Retention.

The Commission has proposed that the web-portal system be designed to retain information for a period of at least three (3) years. The Company supports the retention of information for a three (3)

period and the costs associated with this design are provided later in these Comments. Specifically, the Company's system will retain the following information:

- Log-in successful and failed attempts by username
- Successful release of ratepayer account number – including to which username it was released.
- NGS attestation that the Customer signed an LOA
- NGS attestation that the Customer provided a government issued or alternative photo identification
- NGS attestation that the web-portal is being used in connection with marketing in a public venue

E. Mechanism Outputs.

The Commission has proposed that the web-portal produce one of three responses after the NGS enters the specific ratepayer information noted earlier: “No Hit,” “Multiple Hits,” or the ratepayer’s actual account number. The Company supports the mechanism of producing of the three identified outputs and the costs associated with this design are provided later in these Comments. The Commission further encouraged the NGDCs to design the web-portal so that any “No Hits” or “Multiple Hits” would include an identification of the field(s) causing the failure. The Company recognizes that requested design would further the intention of the Tentative Order by increasing the likelihood that NGS will obtain ratepayer account numbers, when authorized, and broaden the natural gas retail market in Pennsylvania. As such, the Company will endeavor to design the web-portal to include the added field failure identifications and will further describe the manner in which this may occur in later compliance filings.

F. Cost Estimates.

In the Tentative Order, the Commission requested NGDCs to provide an estimate of the costs associated with the implementation and regular operation and maintenance of the web-portal. The Company has developed an *estimated* cost for the design and implementation of the web-portal, set up in the manner described herein, of \$85,500. The annual estimated cost for the regular operation and maintenance of the web-portal is estimated at \$10,000. It is important to note that these costs are estimates only and any modifications to the web-portal design will alter these costs. The identified estimated costs for implementation, operations and maintenance of the web-portal will encompass access to the residential and small commercial ratepayers account numbers for Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC.

G. Cost Recovery.

In the Tentative Order, the Commission requested NGDCs to discuss a possible mechanism for the potential allocation and recovery of the costs associated with the web-portal. As the Company's estimated costs, as described in Section F, are incremental to the Company's existing investments and ongoing operations and maintenance expenses, the Company proposes cost recovery through a rider or incremental surcharge. The Company would support a cost sharing mechanism whereby the costs would be shared between existing residential and small business Choice ratepayers and the NGS' operating in the Company's territory.

H. Timeline.

The Commission has proposed that the NGDC's web-portals are operational by August 31, 2016. The Company appreciates the Commission's desire to have the web-portals functioning by the fall season, which is the prime marketing season. However, the Company must ensure that it has adequate time, after the final Commission requirements are set and after Company compliance plans are approved, to implement the web-portal in a safe, secure and user friendly format. As such, the Company reasonably believes it will need one (1) year from the date the final Commission requirements are determined, provided Company compliance plans are timely evaluated and approved, for the web-portal to be designed, delivered, tested, and implemented. This timeframe is consistent with the timeframe provided to the Electric Distribution Companies for the electric web-portal.

III. Conclusion.

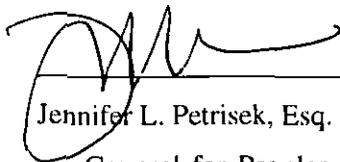
Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC appreciates the opportunity to provide these comments and respectfully request that the Commission consider the Company's foregoing comments as it implements a policy for NGS access to NGDC residential and small commercial ratepayer account information.

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Respectfully submitted this 26th day of May, 2015,

MAY 26 2015

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Jennifer L. Petrisek, Esq.

Counsel for Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division & Peoples TWP LLC

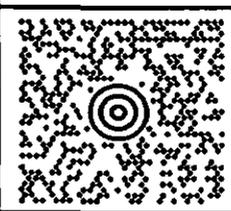
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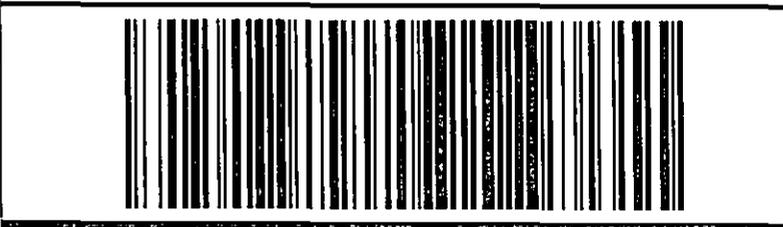
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