

June 8, 2015

Honorable Rosemary Chiavetta
Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, Pennsylvania 17105-3265

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SECRETARY'S BUREAU

Re: Docket No. M-2015-2474802 – Investigation of Pennsylvania’s Retail Natural Gas Market: Joint Natural Gas Distribution Company - Natural Gas Supplier Bill

Dear Secretary Chiavetta:

In accordance with the Tentative Order entered on April 23, 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. PCL&P estimates that it would cost approximately \$25,000 to implement the recommendations set forth in the Order. Currently, there are no natural gas suppliers (“NGS”) offering service in PCL&P’s service territory.

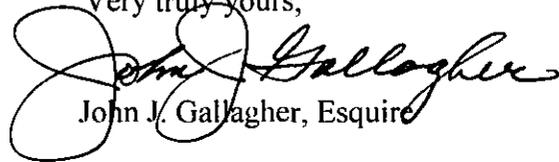
The Order recommends the following changes with respect to NGDC bills: (1) the inclusion of NGS logos on NGDC bills; (2) the expansion of the bill messaging space allotted to NGSs; and (3) the inclusion of a Shopping Information Box. Although PCL&P has implemented analogous changes with respect to its electric bills pursuant to a Final Order issued by the Commission,¹ these recommendations should not be applied to PCL&P’s gas bills. As noted above, there are currently no NGSs serving customers in PCL&P’s service territory. This will result in customers incurring the implementation costs (noted above) related to the need to add an additional page to PCL&P’s bills. However, as a practical matter, customers will not be able to exercise their option to switch to a supplier. This could lead to customer confusion or frustration by creating a misimpression that customers will have the ability to switch to an EGS. Because PCL&P customers will incur additional costs without the ability to take advantage of the benefits, these recommendations should not be applied to PCL&P at this time.

In the event that NGS options do become available in the Company’s service territory, PCL&P proposes to implement these recommendations within six months of an NGS approval to serve the Company’s service territory.

¹ *Investigation of Pennsylvania’s Retail Electricity Market: Joint Electric Distribution Company – Electric Generation Supplier Bill*, Final Order, Docket No. M-2014-2401345 (Order entered May 23, 2014).

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

Very truly yours,



John J. Gallagher, Esquire

Counsel for Pike County Light & Power Company

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