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January 8, 2016

Via E-filing

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

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

Dear Ms. Chiavetta:

Enclosed for filing, please find the Compliance Plan of Columbia Gas of Pennsylvania, Inc.'s ("Columbia"), in accordance with the Pennsylvania Public Utility Commission's Final Order dated July 8, 2015, regarding the above-referenced docket.

Please direct any questions with regard to this filing to the undersigned by calling (717) 238-0463.

Sincerely,

A handwritten signature in black ink that reads "Andrew S. Tubbs". The signature is fluid and cursive.

Andrew S. Tubbs

AST/kak  
Enclosure

cc: Megan Good ([megagood@pa.gov](mailto:megagood@pa.gov))  
Ken Stark ([kenstark@pa.gov](mailto:kenstark@pa.gov))

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**COLUMBIA GAS OF PENNSYLVANIA, INC.  
COMPLIANCE PLAN**

**I. INTRODUCTION**

On April 9, 2015, the Pennsylvania Public Utility Commission (“Commission”) entered a Tentative Order at the above-captioned docket relative to proposed procedures to facilitate natural gas suppliers (“NGSs”) access to natural gas distribution company (“NGDC”) customer account numbers when the customer’s account number is not available from the customer or the Eligible Customer List (“ECL”).<sup>1</sup> Columbia Gas of Pennsylvania, Inc. (“Columbia” or the “Company”) filed comments in response to the Tentative Order on May 26, 2015.

On July 8, 2015, the Commission entered a final order addressing the proposals from its Office of Competitive Market Oversight (“OCMO”), wherein the Commission determined that the development of an Account Number Access Mechanism (“ANAM”), similar to the model used in Pennsylvania’s retail electric market, be developed as a tool to spur competition in the retail natural gas supply market.<sup>2</sup> In its July 8<sup>th</sup> Final Order, the Commission directed all major Pennsylvania NGDCs to file compliance plans within

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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 entered April 9, 2015.

<sup>2</sup> *Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers*, Docket No. M-2015-2468991, Final Order entered July 8, 2015.

six months of the entry date of the order, i.e., on or before January 8, 2016.<sup>3</sup> Specifically, the Commission directed that the NGDC compliance plans outlining their proposed account number access mechanisms be aligned with the directives provided in the Final Order. To that end, the Commission stated that compliance plans must outline the development of an ANAM that:

- Includes a username and passcode-protected secure website portal that will, upon customer request and consent, provide NGSs with access to residential and small business customer account numbers that are not available on the NGDC's ECL.
- Requires an NGS to submit the customer's full name, service street address and five-digit postal code.
- Documents the NGS's attestation that it is enrolling the customer in a public location and that it has obtained a photo ID and a signed Letter of Authorization ("LOA") from the customer.
- Provides a field on the form to allow the NGSs to attest that the customer has provided photo documentation of customer identification.
- Returns the requested account number if a match exists.
- Tracks the usage of the system and be able to identify who accessed what data and when.<sup>4</sup>

Further, the Commission's Final Order provides that the NGDCs must retain this information for three years and the information must be easily accessible to regulators

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<sup>3</sup> *Id.* at p. 33.

<sup>4</sup> *Id.*

upon request.<sup>5</sup> See 52 Pa. Code § 59.99. Also, the NGDCs are to identify the expected costs, proposed cost recovery mechanism, and appropriate level of cost allocation in the compliance plans.<sup>6</sup> Columbia hereby submits its compliance plan, as described in detail below.

## II. COMPLIANCE PLAN

### A. Plan Components

To assist the Commission and interested parties in reviewing the Company's compliance plan, Columbia has prepared the attached matrix, which outlines the proposed ANAM, which it plans to implement on or before August 31, 2016. ("Attachment A"). As shown in Attachment A and summarized below, Columbia's planned ANAM comports with the Commission's Final Order and will enable NGSs to access customer account numbers for residential and small commercial customers that are eligible to participate in the Company's Choice program. Columbia's proposed ANAM includes the following components:

1. Columbia's ANAM will use a passcode-protected web based portal located on the Company's existing supplier website ([www.columbiasuppliers.com](http://www.columbiasuppliers.com)), which will provide NGSs with access on a 24/7 basis.
2. Columbia's ANAM will include fields for NGSs to input a customer's full name, service street address and postal code. However, Columbia has determined that it will not include wildcard inputs in its ANAM. The Company reviewed the potential use of wildcard inputs in its ANAM, but found that wildcard inputs would increase the risk of inadvertently releasing customer information for

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

<sup>6</sup> *Id.* at pp. 28-29.

incorrect accounts. Instead of a wildcard feature, Columbia will include optional fields for NGSs to input additional customer information. The optional fields will be used when the search result finds multiple accounts based on the required inputs. Columbia believes the addition of the optional fields will increase the opportunities of finding a single match in its customer information database. Examples of the optional fields are phone number, city, state and the last four digits of the customer's social security number.

3. Columbia's ANAM will provide one of the following four responses to a search request:

a) The active 12 digit account number (if a single match is found based on entered search criteria);

b) Account not eligible for Choice (if a single match is found based on entered search criteria, but the account has arrears more than 60 days, or is a CAP account);

c) Account not found (if no match is found based on entered search criteria);

or

d) Multiple accounts found (if there are multiple matches found based on entered search criteria).

4. When Columbia's ANAM response is either account not found or multiple accounts found, the system will retain the entered search criteria and allow the user to update the search criteria and resubmit the request.

5. Columbia's ANAM will include check boxes to indicate that the NGS is attesting to the following:

a) Receipt of a signed LOA from customers;

- b) Customer has provided a government–issued photo ID or an alternative form of identification that includes the customer’s photograph); and
  - c) NGS is currently marketing at a public venue
6. Columbia’s ANAM will retain user access information for a period of at least three years.

B. Timeline

As noted above, Columbia proposes to implement its ANAM by August 31, 2016.

C. Costs and Cost Recovery

Consistent with Columbia’s comments to the Commission’s Tentative Order in this proceeding, Columbia maintains that the cost estimate to implement its ANAM without wild cards and on-going administrative and maintenance costs are set forth below:

<b><u>Without Wild Card</u></b>	Estimates	
	Low	High
Implementation	\$375,000	\$487,000
Annual administrative and maintenance	\$1,840	\$2,760

Also, as noted in Columbia's initial comments, the Company proposes to use its existing Rider Customer Choice ("Rider CC") to recover the costs associated with developing, implementing and maintaining its ANAM. Currently Rider CC is billed to all Choice eligible customers and reflects recovery of 33% of the estimated cost to issue a triennial ECL letter. Attachment B hereto contains a proposed *pro forma* tariff page to implement this cost recovery mechanism.

### III. CONCLUSION

Columbia Gas of Pennsylvania, Inc. requests that the Pennsylvania Public Utility Commission issue an order approving the Company's Account Number Access Mechanism.

Respectfully submitted,



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Date: January 8, 2016

*Attorney for Columbia Gas of Pennsylvania, Inc.*

# ATTACHMENT A

**Attachment A**  
**Columbia Gas of Pennsylvania, Inc.**  
**NGS Account Number Access Mechanism**  
**Docket No. M-2015-2468991**

PaPUC Requirements:	
NGDCs are directed to provide a customer account number access mechanism via a passcode-protected website, as both a portable and mobile mechanism	Columbia will develop a secure web portal for use by Commission licensed and Columbia approved NGSs to search for active residential and small commercial accounts that are eligible for Columbia's Choice program. A new icon will be added to Columbia's existing supplier website. To access the site, NGSs will be required to log in with a unique userID and password. The login session will time-out after 10 minutes of inactivity and the NGS will be required to login again. The NGSs will be prompted every 90 days to change their password. The login form will also require the NGS to agree to Columbia's terms and conditions.
Use of the website portal would provide immediate results	Columbia's account number access mechanism response will be realtime. However, there are times when Columbia's billing database, which will be used to verify the submitted customer information and obtain the appropriate account number, will be in update mode and inaccessible. This "dark window" occurs Monday- Friday from 10:00 to 11:00 PM, Saturday 12:30 to 5:00 AM, and some weekends on Sunday evening 7:00 PM to Midnight.
NGSs are responsible to manage their agents access to this mechanism	Columbia will create an administrative environment for each specific NGS. The specific NGS would be responsible for administering userIDs and passwords for their agents. NGSs would be solely responsible for the protection of those userIDs and passwords to ensure there is no unauthorized access by any individuals. NGSs should implement policies and practices to ensure employees are trained in the importance of protecting their userIDs and passwords, restricting use to only the individual assigned to the UserID and password, and ensuring userIDs and Passwords are cancelled for individuals no longer employed.
In order to avoid inadvertent release of unauthorized data while providing the greatest possibility for successful account number returns, NGSs must provide the required customer specific data elements to the NGDCS: customer's full name, service address and postal code are required data elements to be submitted to NGDCs.	Columbia's search screen will support the following customer data elements: Customer's full name, service address and postal code, and will only return the account number if there is a one-to-one match. In addition to the three required customer data elements, Columbia will include the use of additional optional search criteria including phone number, City, State, and the last four digits of the customer's social security number or a business Tax ID Number. Other optional search criteria may be added after internal testing has been completed. The goal of adding additional optional data elements will be to increase the probability of a one-to-one match for the NGS, while safeguarding customer information.
Upon submission of the customer specific data, there are three proposed responses: "NO HIT", "MULTIPLE HITS", or the customer's account number.	Columbia's plans to support the following four responses: 1) if a one-of-one match is found, the system will display the customer's 12 digit account number; 2) if one-of-match is found, but the account is not eligible for Columbia's Choice program, the system will display "Account Found Not Eligible for Choice"; 3) if no account is found, "Account Not Found update search criteria" will be displayed; and 4) If more than one match is found, "Multiple Accounts Found update search criteria" will be displayed. The previously entered customer information will remain populated in the fields for editing and resubmission.
To ensure customer protections, NGDCs must require NGSs attestation that the enrollment occurred in a public venue, the customer signed an LOA, and the customer provided government issued or alternative photo ID.	The NGS representative providing search criteria will also be required to complete check box fields to attest to being in a public venue, indicate receipt of a signed Letter of Authorization (LOA), and indicate NGS verification of a photo ID from the customer. Columbia's search processing will not process unless the NGS confirms all three customer protections.
NGDC is required to maintain a record of who accessed the system, when they did so and the data obtained. The data must be retained for at least three years.	The userID and password will allow Columbia to maintain a record of who accessed the system, when they did so, and what data was obtained. Columbia will create and store all access attempts, and their results. The stored data will include the following elements: 1) UserID; 2) NGS company name; 2) Timestamp; 3) the Search Input Fields; 4) Search Status; 5) Returned Account Number; 6) if the returned account number was on the Eligible Customer List; and 7) all three Customer Protection attestations.

# ATTACHMENT B

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## RIDER CC - CUSTOMER CHOICE

### APPLICABILITY

This Rider has been established to recover costs related to providing Customer Choice to customers in Pennsylvania [including the costs arising from implementation and administration of the Account Number Access Mechanism as specified in the Final Order entered on July 8, 2015 in Docket No. M-2015-2468991](#). (C)

In addition to the charges provided in this Tariff, an amount shall be added to the otherwise applicable charge for each thm of sales quantities or distribution quantities distributed by the Company to Customers receiving service under Rate Schedules RSS, RDS, and SCD, SGSS, SGDS, and DGDS using less than or equal to 64,400 thm annually.

### RATE

The Rider CC rate will be included in the Pass-through Charge on the customer bill.

The rate information is detailed in the Rate Summary pages of this Tariff.

Customers enrolled in the Company's Customer Assistance Plan ("CAP") shall not be billed the Rider CC.

Further, the Company may reduce or eliminate the otherwise applicable charge to any Customer if it is reasonably necessary to do so to meet competition from an alternative fuel, including gas from another supplier of gas that has constructed, or could construct, facilities to deliver gas to the Customer without use of the Company's facilities. The Company will notify Customer of the applicable rate if lower than the applicable rate set forth above, four (4) days prior to the beginning of each billing cycle, unless the rate is the same as charged by the Company in the prior cycle. Such reduction or elimination of the charge shall be eliminated or reduced before any reduction is made to the other charges under this Tariff. (C)

(C) Indicates Change

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Issued:

M. R. Kempic  
President

Effective:

## CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

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