



UGI Utilities, Inc.
460 North Gulph Road
King of Prussia, PA 19406
Post Office Box 858
Valley Forge, PA 19482-0858
(610) 337-1000 Telephone
(610) 992-3258 Fax

January 8, 2016

VIA Express Mail

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

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JAN - 8 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Secretary Chiavetta:

In accordance with ordering paragraph one of the Commission's Final Order at the above docket entered on July 8, 2015, enclosed for filing please the compliance plan of the UGI Distribution Companies, comprised for purposes of this filing of UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc., for developing a secure pass code protected account number access mechanism for natural gas suppliers. A copy of this document has also been emailed to the Commission's Office of Competitive Market Oversight at ra-ocmo@pa.gov.

Should you have any questions concerning this matter, please feel free to contact me.

Very truly yours,

Mark C. Morrow

Counsel for the UGI Distribution Companies

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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UGI DISTRIBUTION COMPANIES
COMPLIANCE PLAN

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PA PUBLIC UTILITY COMMISSION
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In accordance with the provisions of ordering paragraph one the Commission's Final Order in the above-captioned matter entered on July 8, 2015 ("July 8, 2015 Order"), the UGI Distribution Companies ("UGI"), comprised for purposes of this filing of UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc., hereby submit for the Commission's review and approval a compliance plan for developing a pass code protected secure website portal that will provide Natural Gas Suppliers ("NGSs") remote access to customer account numbers. In support thereof they state the following:

1. Attachment A hereto contains UGI's proposed plan for developing and implementing a mechanism for providing NGS access to customer account numbers through a pass code protected secure website portal, including an implementation timeline and estimated costs.
2. Attachment B hereto is an illustrative example of the access mechanism screen, including the required field elements, for the purpose of making an exact match for the particular account holder query. The appearance and/or layout of the screen may change as needed.
3. Subject to Commission approval, the proposed access mechanism will be in place and available to NGSs on or before the August 31, 2016 deadline set forth on page 30 of the July 8, 2015 Order.

4. Given the modest estimated cost of implementation, UGI is not seeking cost recovery at this time.

ACCORDINGLY, the UGI Distribution Companies respectfully request that the Commission approve their proposed Customer Account Number access mechanism for Natural Gas Suppliers.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark C. Morrow', with a long horizontal line extending to the right.

Mark C. Morrow
(Attorney I.D. #33590)

Counsel for the UGI Distribution Companies

Dated: January 8, 2016

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ATTACHMENT A

(Compliance Plan)

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**UGI Utilities, Inc. – Gas Division (“UGI”)
UGI Penn Natural Gas, Inc. (“PNG”)
UGI Central Penn Gas, Inc. (“CPG”)**

Compliance Plan – Customer Account Number Access Mechanism for NGSs

Objective

To comply with the Public Utility Commission’s Final Order regarding NGDC Customer Account Number Access Mechanism for NGSs entered on July 8, 2015 at M-2015-2468991. UGI, PNG, and CPG will provide an instant access tool through which a qualified NGS can obtain a prospective customer-specific account number when marketing in public venues such as malls, fairs, trade shows and other community events in order to facilitate enrollments.

Target Users

UGI, PNG, and CPG will make this tool available to NGSs who have completed both of the following:

- The registration process required by UGI’s, PNG’s, and CPG’s Choice Supplier Tariffs
- The EDI testing requirements necessary for enrolling customers

Strategy

UGI, PNG, and CPG will utilize the secure password-protected section of its Gas Management Website titled “Choice” that is currently available to NGSs as the location for its customer account number access mechanism “access mechanism”. This website location is already familiar to the NGSs who are currently serving customers in the UGI, PNG, and CPG service territories and is where the entry point is located to the Eligible Customer List and other important choice supplier information. The access mechanism is intended to be used by NGSs during the time when their marketing efforts occur at a public venue. This access mechanism will be developed such that it can be monitored and tracked by UGI, PNG, and CPG for the purposes of complying with regulators’ requests for such data. The access records will be maintained for three years per the supplier switching regulations at 52 Pa. Code §59.99.

Access Mechanism Development

Attachment B is a screen shot of the access mechanism including the required field elements for the purpose of making an exact match for the particular account holder query. The screen shot is from the system currently in place for UGI’s Electric Division and for illustrative purposes only. The appearance and/or layout may change as needed. The steps involved in developing the access mechanism are outlined below.

1. Create access mechanism icon.
2. Create fields required for completion before customer account number will be provided.

The required field elements are:

- a) Customer’s full name
- b) Service street address
- c) Five-digit postal code
- d) A check box to indicate that the NGS is attesting to certain facts. Those facts are that the NGS is currently marketing at a public venue and has obtained both a type of photo identification and a signed Letter of Authorization (LOA) from the customer.
- e) Type of photo identification

- f) Name on photo id
3. An exact match using the first three elements of the request will be required as part of the program logic when matching against the UGI, PNG, and CPG databases to ensure that the correct account number is being provided. Only active accounts will be included in the UGI, PNG, and CPG databases.
 4. When an exact match is found, the twelve-digit customer account number will be displayed on the screen. In the event that the input data matches an account with a Protection from Abuse (PFA) indicator, the phrase "PFA restricted" will be displayed. Under this circumstance, it is UGI's, PNG's, and CPG's normal business practice to ensure that information is not released to anyone but the account holder.
 5. When an exact match is found for more than one account number and a single account holder cannot be identified, the phrase "multiple hits" will be displayed. The access mechanism will not know which inputs are correct and which are not correct for the particular account holder query. There is one additional circumstance where the required data elements will match more than one account number. That circumstance would be when a customer has a separate outdoor lighting and/or electric account in addition to their regular service account. In those circumstances, all account numbers will be provided.
 6. When an exact match is not found, the phrase "no hits" will be displayed. The program logic will be developed to first look at service street address, next to the 5-digit postal code, and last to the name. Since the program will require a match on all three of these elements, the reason for the lack of a match will first be on whether the service street address is in our database. If the service street address is not in our database, then that will be the reason displayed for the "no hit". If the service address is in our database, the next step in the logic will be to match on the postal code. If the postal code does not match the service street address, the postal code will be the reason displayed for the "no hit". Last, if the service street address and the postal code are found together in our database, but the name does not match, the customer name will be the reason displayed for the "no hit".
 7. A record of who used the access mechanism, when they used it, what information they obtained, and what form of customer photo identification was acquired will be archived for three years.

Implementation Timeline

As stated in the Commission's Final Order, the access mechanism will be in place and operational no later than August 31, 2016.

Estimated Costs and Cost Recovery

UGI, PNG, and CPG estimate that the cost to develop and program the access mechanism will not exceed \$4,800. Because of the *de minimus* cost, UGI, PNG, and CPG will not be proposing cost recovery.

ATTACHMENT B

(Illustrative Example of Access Mechanism Format)

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SECRETARY'S BUREAU

Choice Marketer Customer Portal for UGI Gas

WELCOME Megan Suppliers: UGI Utilities, Inc. Monday, December 14, 2015 2:07:48 PM

For help, please contact the UGI customer service representatives at 1-800-276-2727 during normal business hours.
 Fields marked with an * are required.
 Click on field labels containing the ? icon for field-specific help.

Verification

By checking this box, I attest to the following:

- I am currently marketing in a public venue.
- I have obtained and will retain a signed letter of authorization (LOA) from the customer.
- I have obtained photo identification from the customer.

-- select --
 * Photo ID Type ? Other Photo ID Type

ID First Name ID Last Name

Search Criteria

* Customer First Name or Business Name ? Customer Last Name

? House/BLDG # * Street Name ? Street Type * 5-digit Postal Code

Reset Search

Search Results:

1. Customer Account #
2. "Multiple Matches"
3. "No Matches"

Possible reason for "No Match":

1. No matching street address in database – verify data and re-submit
2. No postal code matches street address – verify data and re-submit
3. No name matches street address and postal code – verify data and re-submit

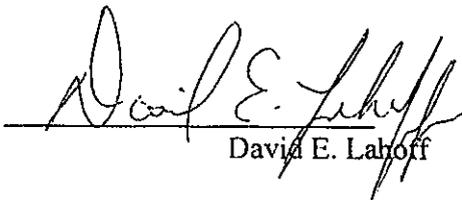
Note: This format is from the system currently in place for UGI’s Electric Division and for illustrative purposes only. The appearance and/or layout may change as needed.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION

David E. Lahoff, deposes and says that he is Manager, Tariff & Supplier Administration for UGI Utilities, Inc., that he is duly authorized to and does make this Verification on its behalf and on behalf of UGI Penn Natural gas, Inc. and UGI Central Penn Gas, Inc. (collectively the "UGI Distribution Companies"); that the facts set forth in the foregoing document are true and correct to the best of his knowledge information and belief; and that this Affidavit is made subject to the penalties of 18 Pa.C.S. §4904 (relating to unsworn falsification to authorities).


David E. Lahoff

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Natural Gas Distribution Company :
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CERTIFICATE OF SERVICE

I hereby certify that I have, on this 8th day of January, 2016 served a true and correct copy of the foregoing document in the manner and upon the persons listed below in accordance with requirements of 52 Pa. Code §1.54 (relating to service by a participant):

VIA FIRST CLASS MAIL:

Office Of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1921

Office of Small Business Advocate
Suite 1102, Commerce Building
300 North Second Street
Harrisburg, PA 17101

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120



Mark C. Morrow

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ORIGIN ID: KPDA (610) 992-3209
MARK MORROW
UGI CORPORATION
460 N. GULPH ROAD

SHIP DATE: 08JAN16
ACTWGT: 1.00 LB
CAD: 1072304927/NET3670

KING OF PRUSSIA, PA 19406
UNITED STATES US

BILL SENDER

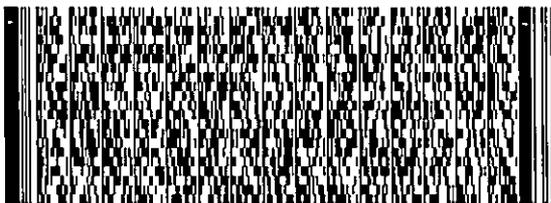
TO ROSEMARY CHIAVETTA, SECRETARY
PENNSYLVANIA PUBLIC UTILITY COMM.
400 NORTH ST
COMMONWEALTH KEYSTONE BLDG.
HARRISBURG PA 17120

539J10E61/3100

(717) 783-1740
INV.
PO

REF:

DEPT: 0411



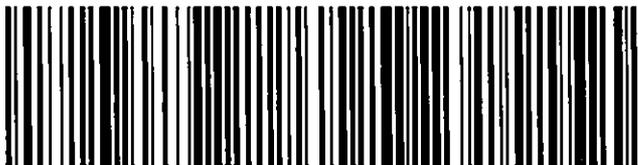
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