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January 8, 2016

**VIA FEDERAL EXPRESS**

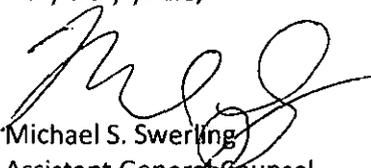
Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**RE: NGDC Customer Account Number Access Mechanism for NGSs**  
**Docket No. M-2015-2468991**

Dear Ms. Chiavetta:

Enclosed for filing in the above-referenced matter is **PECO Energy Company's Compliance Filing regarding Customer Account Number Access Mechanism for NGSs**. Please contact me directly if you have any questions.

Very truly yours,



Michael S. Swerling  
Assistant General Counsel

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Attachment

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JAN 8 2016

Natural Gas Distribution Company :  
Customer Account Number Access : M-2015-2468991  
Mechanism for Natural Gas Suppliers :

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**PECO ENERGY COMPANY'S COMPLIANCE FILING  
REGARDING CUSTOMER ACCOUNT NUMBER ACCESS MECHANISMS FOR  
NATURAL GAS SUPPLIERS**

**I. INTRODUCTION**

On July 8, 2015, the Pennsylvania Public Utility Commission (the "Commission" or the "PUC") issued a Final Order regarding *Natural Gas Distribution Company Customer Account Number Access Mechanisms for Natural Gas Suppliers* at Docket No. M-2015-248991 ("Final Order"). The Final Order required NGDCs to implement secure, password protected, account number access mechanisms for natural gas suppliers ("NGSs") by August 31, 2016. (Final Order at 1). Additionally, the Final Order directed natural gas distribution companies ("NGDCs") to submit compliance plans detailing their proposed mechanisms within six months of the entry date of the Final Order. (Final Order at 33). Accordingly, PECO Energy Company ("PECO" or the "Company") hereby submits its *Compliance Filing Regarding Customer Account Number Access Mechanisms For Natural Gas Suppliers* ("Compliance Filing") in accordance with the Commission's Final Order.

**II. THE COMMISSION'S REQUIREMENTS FOR COMPLIANCE PLANS**

According to the Final Order, each NGDC's compliance plan must detail mechanisms, which incorporate specific elements:

1. A username and passcode-protected secure website portal, which provides residential and small commercial account numbers (for customers not included in an NGDC's eligible customer list ("ECL")). (Final Order at 33).

2. Inputs for the customer’s full name, street address and five-digit postal code. (Id.)
3. Functionality to document an NGS’s attestation that it is enrolling a customer in a public forum and that it obtained the customer’s photo identification and signed letter of authorization (“LOA”). (Id.)
4. Allowance to document the customer’s photo identification. (Id.)
5. Maintenance of portal access data, including who accessed the customer data and when it was obtained, for a three-year period. (Id.)

The NGDC’s compliance plan also should detail the expected implementation costs, proposed recovery mechanisms and appropriate levels of cost allocation (between NGDCs and NGSs). (Id.). The following compliance plan demonstrates how PECO’s account number access mechanism complies with these requirements.

### **III. PECO’S CUSTOMER ACCOUNT NUMBER ACCESS COMPLIANCE PLAN**

#### **A. PECO’s Proposed Account Number Access Mechanism**

PECO will enhance its existing website portal for NGSs<sup>1</sup> to provide the same level of access that PECO’s Supplier Customer Choice Energy System Solution (“SUCCESS”) website portal currently provides to electric generation suppliers (“EGSs”). Specifically, City Gate Solutions will adopt the following properties that currently apply to SUCCESS:

##### **1. Secure Portal**

PECO’s website portal for NGSs will remain a passcode-protected, secure website used by PECO to coordinate the delivery of competitive natural gas supply with NGSs. PECO currently provides authorization to access the NGS portal to a limited number of individuals within each NGS. Each NGS is responsible to manage the authorization provided within their

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<sup>1</sup> PECO currently uses City Gate Solutions, which is a pass-code protected, secure website used to coordinate the delivery of competitive natural gas supply with NGSs.

organizations. PECO will continue this practice in order to safeguard the integrity of private customer information obtained.

## **2. Applicability Per Customer Rate Class**

PECO's proposed account number access mechanism will only provide NGSs with access to data for customers participating in PECO's Low Volume Transportation ("LVT") Gas Choice program in accordance with the Commission's Final Order.

## **3. NGS Attestation**

For each customer request uploaded, the NGS must attest that it is enrolling the customer in a public location and that it has obtained both photo identification and a signed Letter Of Authorization ("LOA") from the customer. PECO's portal will not process the request without such an attestation. Additionally, the NGS must specify the type of photo identification obtained.

## **4. Data Exchange**

In one submittal to the portal, NGSs may include up to 500 individual account number requests. Prior to implementing the NGS portal, PECO plans to provide suppliers with detailed instructions for submitting requests, including a sample file format. NGSs will have the capability to re-submit requests as often as necessary. However, PECO's portal will not permit submission of an additional request until after the results of a previous request are first delivered.

## **5. Customer Information Inputs**

For each request, NGSs must provide the customer's full name, service street address, five-digit postal code and the type of photo identification obtained. The name and address provided must exactly match the information existing in PECO's database to protect against the

inadvertent disclosure of private customer information. Any variance (with the exception of upper versus lower case letters) would result in a mismatch.

To aid the NGSs, PECO's portal will include optional fields where an NGS can provide an additional service street address or customer name. While not required, these fields may improve the likelihood of locating a match of the customer's account number. If no match or multiple matches are found initially, and the NGS has provided additional customer information in the available fields, PECO will repeat the search using this additional information.

Regarding the use of "wildcard" inputs and drop-down box functionality, PECO believes that the use of wildcard inputs increases the risk of inadvertently matching an account number for a different customer. Specifically, when large multi-dwelling complexes, such as apartment buildings are involved, service street address information varies by a very small number of characters. This increases the risk that wildcards will generate a false return – particularly in cases when components of customer names are common between multiple units within the same complex. Permitting wildcards also, by definition, permits the entry of *only* the wildcard character in a given field, thereby, potentially matching every single customer record available, which effectively removes that field from the search completely.

To date, PECO has not discovered a reasonable means of mitigating the wildcard-related risks identified above. Therefore, PECO's NGS portal will not include the use of wildcards in customer searches. Additionally, drop-down box functionality will not apply to PECO's proposed mechanism because of the file-based nature of NGS request submissions.

## **6. Mechanism Outputs**

PECO's NGS portal will provide one of the following responses for each request:

- *NO HIT*

- *MULTIPLE HITS*
- *Customer's PECO account number* (for precise match only)
- *INVALID REQUEST* – This response is provided if PECO is unable to interpret the information provided in a request (e.g., if the NGS formats a request record within the file incorrectly).
- *"MISSING DATA"* – This response is provided if the NGS does not enter any information for a field requiring information.
- *"ON ECL", followed immediately by customer's PECO account number* – This response is provided if PECO finds a precise match, but also finds that the matched account number is available on its ECL.

## **7. Record Retention**

PECO will maintain a record of each request, all data provided, PECO's response, the NGS submitting the request and when the request was received. A record of this information will be retained and recallable for no less than three years in accordance with 52 Pa. Code § 59.99.

## **8. Cost Estimate and Cost Recovery**

PECO currently estimates the total implementation cost of this project to be approximately \$400,000 with additional software maintenance fees of approximately \$10,000 annually. Nearly all the costs relate to IT changes to the Company's information system.

In its Final Order, the Commission made the following statement regarding compliance filing proposals to recover the costs associated with the design, implementation and ongoing operation and maintenance of NGS portals:

However, we do see merit in PECO's proposal, which allocates 50% of the costs to suppliers. We encourage the NGDCs to consider, in providing proposed mechanisms within their compliance plans, the possible sharing of costs with the supplier community. (Final Order at 29).

Accordingly, PECO proposes to recover 50% of its costs for the NGS account number access mechanism through a Purchase of Receivables (“POR”) discount and 50% through the Purchased Gas Cost (“PGC”).<sup>2</sup> If approved, PECO will adjust its PGC tariff rate to include 50% of the total costs amortized over a one-year period with the remaining 50% of the project costs recovered through the POR discount. PECO agrees with the Commission that this recovery mechanism is reasonable. Additionally, this proposal is consistent with the Commission-approved recovery method for PECO’s EGS account number access mechanism.

#### **IV. CONCLUSION**

PECO looks forward to continue working with the Commission and other stakeholders in providing a mechanism for NGSs to safely and securely obtain customer account numbers when marketing in public venues. PECO also continues to applaud the Commission for its zero tolerance policy with regard to violations of customer privacy and customer information confidentiality requirements and strongly agrees that protection of customer information is essential, both for customer safety as well as a robust natural gas supply market.

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<sup>2</sup> See *EDC Customer Account Number Access Mechanism for EGS – PECO Energy Company*, Docket No. M-2013-2355751 (Final Order entered on May 23, 2014).

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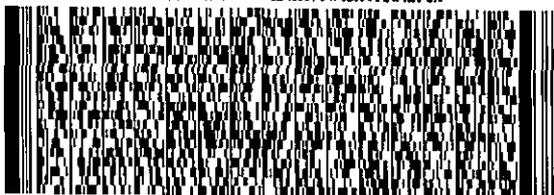
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