



National Fuel

Luke E. Anderson
Attorney

April 14, 2016

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

RE: Compliance Plan Filing
NGDC Customer Account Number
Access Mechanism for NGSs
Docket M-2015-2468991

Dear Secretary Chiavetta:

Attached is National Fuel Gas Distribution Corporation's ("NFG") response to comments filed by the Retail Energy Supply Association on February 8, 2016 regarding NFG's Compliance Plan Filing on January 8, 2016 in the above-captioned docket.

Should you have any questions concerning the Compliance Plan or the instant filing, please contact Michael Novak at (716) 857-7884.

Sincerely,

Luke E. Anderson

Encl.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**NATIONAL FUEL GAS DISTRIBUTION CORPORATION'S
REPLY COMMENTS RE: COMPLIANCE PLAN FILING
REGARDING NGS ACCESS TO NGDC CUSTOMER ACCOUNT NUMBERS**

I. INTRODUCTION

On July 8, 2015, the Pennsylvania Public Utility Commission (“Commission”) entered its Final Order¹ regarding Natural Gas Supplier (“NGS”) Access requiring Natural Gas Distribution Companies (“NGDCs”) including National Fuel Gas Distribution Corporation (“NFG”) to develop a username and passcode-protected secure website portal (“Account Number Access Mechanism”) 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 Eligible Customer List (“ECL”). On January 8, 2016, NFG submitted its compliance plan in response to Ordering Clause 1 of the Final Order (“NFG Compliance Plan”).

The Retail Energy Supply Association (“RESA”) filed comments on February 8, 2016 that, in part, addressed aspects of the NFG Compliance Plan (“RESA Comments”). By Secretarial Letter issued March 15, 2016, reply comments from interested stakeholders regarding the natural gas distribution companies’ (NGDCs) compliance plans have been solicited. The

¹ NGDC Customer Account Number Access Mechanism for NGSs, Docket No. M-2015-2468991 (“Final Order”)

instant filing is NFG's reply to the issues raised the RESA Comments concerning the NFG Compliance Plan.

II. REPLY COMMENTS

At the outset, NFG maintains that its compliance plan is, in fact, compliant with the Final Order. At best, RESA did a cursory review of the NFG Compliance Plan and at no time did it contact NFG to ask any questions concerning features of the web portal or the proposed cost recovery mechanism. In response to specific points raised by RESA:

- 1) *"NFG would not allow the use of wildcards or drop-down boxes and does not address the use of error codes or optional fields or the ability of the NGS to make multiple attempts."*, (RESA Comments at 5).

NFG Response:

The Final Order does not require error codes or optional fields, however, NFG affirms that the web portal's response to invalid entries will be self-evident.

Further, the Final Order does not require wildcards or drop-down boxes.

- 2) *"NGSs should also be able to resubmit the information as frequently as necessary, as was proposed by PECO. While Columbia and PGW indicate that NGSs will be able to resubmit the information, and Peoples proposes to permit NGSs to resubmit "multiple times," it is not clear that these NGDCs will allow unlimited resubmissions. NFG and UGI do not address this requirement of the Final Mechanism Order."*, (RESA Comments at 12).

NFG Response:

NFG hereby affirms that it has not placed a limit on the number of times an NGS may resubmit an entry for the same customer, however, if there is evidence of NGS "phishing", NFG reserves the right to implement a limit.

- 3) *"In addition, as Peoples proposes to identify the field causing the error, all NGDCs should be required to provide as much information as possible to assist an NGS in identifying the field causing the error. Although the Final Mechanism Order*

encouraged NGDCs to identify the cause of the error, Columbia, NFG and PECO do not address this feature”, (RESA Comments at 12).

NFG Response:

The Final Order encourages but does not require that indication of the fields causing failure be provided but NFG will review its design. An unintentional consequence of providing such indication may be that it helps enable an unscrupulous NGS to “phish”. Again, if there is evidence of NGS “phishing”, NFG reserves the right to implement place a limit on the number of times an NGS may resubmit an entry for the same customer.

- 4) *“it is unclear how NFG would recover 50% of the costs from NGSs as a one-time charge -- would it recover only from currently active NGSs or NGS presently using the Mechanism, or would it recover once from each NGS who ever uses the Mechanism?”*, (RESA Comments at 16).

NFG Response:

NFG does not have a specific plan at this point for how it would recover the NGS share of the cost but an upfront (prior to development) assessment to all currently active NGSs would help to determine if web portal is really a priority² for the NGSs on NFG’s system.

- 5) *“As to NFG’s Compliance Plan, it indicates that it will only provide an indication of whether the account number is on the ECL”*, (RESA Comments at 23).

NFG Response:

RESA is incorrect; the indication of whether an account number is on the ECL is in addition to and not in place of displaying the customer information on the portal.

² NFG suspects that much like its ECL, the web portal will be underutilized (if at all). Typically, only one or two NGSs access NFG’s ECL each month. If NGSs balk at paying their share of development costs upfront, NFG believes web portal development should not go forward which would save customers their share of the development costs.

III. REQUESTED ACTION

NFG requests that the Commission approve its compliance plan as originally filed. NFG took a minimalist approach towards the design of its web portal. If the ECL is any indication of future NGS utilization of the web portal, a full “whistles and bells” desired by RESA will be wasteful. Should the Commission require further modifications, NFG observes that the cost and time required to implement will both increase depending upon which modifications are required.

IV. CONCLUSION

WHEREFORE, consistent with the January 8, 2016 filing the NFG Compliance Plan, NFG requests the Commission accept its Account Number Access Mechanism, and approve NFG’s request for deferral of implementation to January 2, 2017, as consistent with the terms and directives of the Final Order.

Respectfully submitted,



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