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April 14, 2016

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

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

Dear Secretary Chiavetta:

Enclosed for filing please find the reply comments of the Energy Association of Pennsylvania to the Commission's March 15, 2016 Secretarial Letter at the above-referenced docket.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna M.J. Clark".

Donna M.J. Clark
Vice President & General Counsel

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REPLY COMMENTS OF THE
ENERGY ASSOCIATION OF PENNSYLVANIA
TO NGDC ACCOUNT NUMBER ACCESS MECHANISM COMPLIANCE PLANS**

I. PROCEDURAL BACKGROUND AND INTRODUCTION

The Pennsylvania Public Utility Commission (“PUC” or “Commission”) initiated an investigation of Pennsylvania’s retail natural gas supply market in September 2013. *Investigation of Pennsylvania’s Retail Natural Gas Supply Market*, I-2013-2381742. On December 18, 2014, the Commission issued a final order in the investigation (“*Gas RMI Final Order*”) outlining its priorities and intentions in a specific action plan assigned to the Office of Competitive Market Oversight (“OCMO”) for implementation. The *Gas RMI Final Order* identified the development of an account number access mechanism by natural gas distribution companies (“NGDCs”) as an “immediate, priority item” for the Commission, expressing the belief that an account number access mechanism similar to the one implemented in the electric market may be useful in the natural gas retail choice market.¹

¹ *Gas RMI Final Order* at pp. 44 - 45.

The *Gas RMI Final Order* requested comments on the account number access mechanism, seeking input from stakeholders on the technology platform; security measures to protect customer privacy; whether the mechanism should be available for use at both public (malls, community events and fairs) and private (homes and business) locations; on how to track and identify mechanism users; and on how long records should be retained which memorialize the provision of the customer account number to a natural gas supplier (“NGS”) when the account number was otherwise unavailable from either the customer or the Eligible Customer List (“ECL”). *Gas RMI Final Order* at p. 45. The Energy Association of Pennsylvania (“EAP”) and its member NGDCs² as well as the Retail Energy Supply Association (“RESA”) and individual NGSs submitted comments in response to the request outlined in the *Gas RMI Final Order*.

Following Commission review and evaluation of stakeholder input, the Commission entered a tentative order on April 9, 2015, proposing the use of pass-code protected website portal as the platform for an account number access mechanism, detailing customer data inputs and mechanism outputs as well as the means of protecting customer information. *Tentative Order Re: NGDC Customer Account Number Access Mechanism for NGSs*, Docket No. M-2015-2468991 (“*Tentative Order*”). The *Tentative Order* sought input on how to develop and implement the Commission’s proposed mechanism, solicited cost estimates from the NGDCs, and asked stakeholders to address issues of cost allocation and cost recovery. The Commission further suggested that NGDCs would “be required to have their account number access mechanisms available for NGS use no later than August 31, 2016.” *Tentative Order* at p. 18. In

² Columbia Gas of Pennsylvania, Inc.; Pike County Light & Power Company; National Fuel Gas Distribution Corp.; PECO Energy Company; Peoples Equitable Division; Peoples Natural Gas Company LLC; Peoples TWP LLC; Philadelphia Gas Works; UGI Central Penn Gas, Inc.; UGI Penn Natural Gas, Inc.; UGI Utilities Inc.; and, Valley Energy Inc.

May 2015, EAP, its NGDC members, RESA and individual NGSs submitted comments to the Commission's proposed account number access mechanism as outlined in the *Tentative Order*.

On July 8, 2015, the Commission entered a final order directing NGDCs to submit compliance plans on or before January 8, 2016 which would implement an account number access mechanisms no later than August 31, 2016. *See, Final Order Re: NGDC Customer Account Number Access Mechanism for NGSs*, Docket No. M-2015-2468991 ("*Final Order*") at p. 33. The *Final Order* set forth the specific capabilities and attributes that the account number access mechanism would need in order to gain Commission approval and addressed a range of suggestions and issues raised by RESA and individual NGSs in comments to the Commission's proposal. *Final Order* at pp. 8 -25 and 33. The *Final Order* also addressed NGDC concerns on whether an account number access mechanism was needed, *id.* at p. 6, confirmed that the mechanism is intended for residential or small customer enrollment by suppliers, *id.* at p. 8, required updated cost estimates and proposed cost recovery mechanisms as part of the NGDC compliance plans, *id.* at pp. 28 – 29, and maintained an August 2016 implementation date to allow for usage of the mechanism during the NGSs prime marketing season, *id.* at pp. 29 – 30. The Commission responded to additional supplier concerns regarding the existing ECL, stating that the current proceeding was not the appropriate forum to determine changes to either the electric or gas ECL and referring that issue to OCMO. The *Final Order* provided 30 days for public input on the individual compliance plans to be filed in January 2016 and an additional 6 months for the NGDCs to both obtain Commission approval and to implement the account number access mechanism.

All NGDCs required to file compliance plans did so by the January 8 deadline and only RESA provided comments on February 8, 2016. As detailed below, RESA's comments do not

assert that the plans filed by NGDCs are non-compliant but instead rehash many of the positions, suggestions and arguments raised by RESA or other suppliers in earlier sets of comments to the *Gas RMI Final Order* and the *Tentative Order* AND addressed by the Commission in its *Tentative Order* and the *Final Order*. RESA's comments are in the nature of a petition for reconsideration of the *Final Order* and should be summarily disposed of in the context of ruling upon the individual NGDC compliance plans as both untimely and failing to meet the legal standard for reconsideration. EAP files these comments to supplement those filed individually by its NGDC members and urges the Commission to proceed to rule upon the pending compliance plans.

II. COMMENTS

A. The Commission should consider only whether NGDC plans to develop and implement an account number access mechanism adhere to the requirements set forth in the *Final Order* and not entertain RESA's untimely attempt to a third bite at the apple.

The *Final Order* made no provision for reply comments to the compliance plans. By July 2015, stakeholders had submitted two separate sets of comments to the Commission providing input on an account number access mechanism for use in the natural gas retail market. The Commission had determined that such a mechanism would facilitate shopping by providing NGSs ready access to customer account numbers and had specified the particular capabilities and attributes which a NGDC account number access mechanism must demonstrate in order to be deemed compliant. The Commission had also rejected RESA's proposal to allow for the use of the proposed account number access mechanism in all settings, public or private, and had reiterated that the mechanism was to be used in circumstances where the account number is not

available from the customer or on the ECL.³ It is reasonable to assume, therefore, that the Commission sought comments in February 2016 limited to issues of whether the NGDC plans adhered to the specific requirements enunciated in the *Final Order* and was not looking to entertain a repeat of earlier points raised by suppliers and resolved by the Commission.

RESA, on the other hand, has used the invitation for comments to the compliance plans as an opportunity to, *inter alia*, advocate for the third time its criteria on account number access mechanisms and pressure the Commission to revisit matters resolved in the *Final Order*. For example, RESA reiterates its plea that suppliers need not consider the ECL prior to turning to the account number access mechanism and restates its position that the mechanism be available for use in private homes and businesses.⁴ These arguments are not new or novel, have been raised repeatedly by RESA in comments to the *Gas RMI Final Order* and the *Tentative Order*, and ignore the Commission's concern for residential customers who clearly view door-to-door sales as "overly intrusive and annoying." *Tentative Order* at p. 14. In this respect, RESA's comments are in the nature of a petition for reconsideration, are untimely,⁵ and do not warrant consideration at this late date. *See, e.g.* *Duick v. Pennsylvania Gas and Water Co.*, 56 Pa. P.U.C. 553 (1982).

Further, it is striking that RESA, in its comments to the compliance plans filed by the individual NGDCs, makes no claim that any plan is wholly outside the compliance parameters set forth by the Commission in its *Final Order*. Rather, RESA explores over a dozen specific

³ The *Final Order* specifically balanced the protection of private customer information with the Commission goal to allow for a safe and user-friendly retail market, *id.* at p. 12; provided for marketing in public places as opposed to private homes and businesses, *id.* at o. 2; and stated that the mechanism was to be used for customers who were shopping but were not included on the ECL, *id.* at p. 6.

⁴ RESA's comments also ask the Commission to "revisit the information that an NGS should be required to enter into the NGDCs system when seeking the account number" or to mandate NGDC participation at an OCMO meeting to establish best practices relating to the mechanism. *See*, RESA comments to *Final Order* at pp. 7 -8. Neither of which is appropriate some seven months following the issuance of the *Final Order*.

⁵ *See*, 52 Pa. Code § 5.572(d) providing that "[p]etitions for reconsideration...shall be filed within 15 days after the Commission order involved is entered or otherwise becomes final."

elements of a mechanism already considered and defined in the *Final Order*, seeks a stakeholder meeting to explore additional changes to the proposed mechanism and to define best practices, seeks reconsideration and a “declaration” from the Commission that the mechanism can be used in both public and private settings, and requests elimination of the specific Commission directive that NGSS first consult the ECL prior to using the account number access mechanism. To the extent RESA provides input to specific NGDC compliance plans, its comments acknowledge that those plans meet the Commission parameters and suggest only minor changes or clarifications; all of which can be addressed, if warranted, in the approval process.

In essence, through the guise of providing comments to compliance plans, RESA would have the Commission reconsider and abandon many of the protections adopted in the *Final Order* that provide consumer privacy and minimize pressure sales tactics.⁶ RESA’s practice to rehash, reiterate and repeat its positions long after the issuance of final orders and directives by the Commission flouts the generic process employed in the retail market investigation and delays implementation of the very mechanism advanced by its members.⁷ This practice underscores RESA’s belief that the best retail market enhancement is one that fits all the needs of the suppliers (as opposed to consumers or the utilities) at no cost, that favors a “one size fits all” approach over the flexibility afforded in the *Final Order* and shifts the compliance risk to the regulated utility.

⁶ The Commission considers the protection of customer information to be of paramount importance as stated in the *Final Order* at p. 12 and reflected in current regulations found at 52 Pa. Code § 62.78. RESA’s members seek access to restricted customer information in possession of NGDCs with the promise that they will not disclose the data to another party. Access in this manner, without specific customer approval, would violate 52 Pa. Code § 62.78(a).

⁷ This proceeding to adopt an account number access mechanism has stretched over an eighteen month period and, to date, has not resulted in the type of finality and regulatory certainty that a rulemaking proceeding would have afforded. While use of generic orders has evolved into a “process” to establish standards at the Commission, its many pitfalls include the lack of finality highlighted in this latest RESA effort to change a final order by recycling well-worn arguments months beyond the time for reconsideration.

Before addressing the specific question raised by the Commission in its March 15 Secretarial Letter, EAP initially and respectfully suggests that the use of a Secretarial Letter at this late date to solicit further reply to an issue seemingly resolved by the *Final Order* entered in July 2015 is misplaced and only emboldens RESA to attempt repeated “bites” at the apple.⁸ RESA’s strategy to operate as if no issue is ever truly resolved despite the issuance of Commission final orders in both the gas and the electric retail market investigations creates and fosters regulatory uncertainty, consumer confusion, and delay of the very market enhancements and subsidies which suppliers assert are crucial to their success.

The Commission has directed the NGDCs to implement “a mechanism consistent with the directives”⁹ of the *Final Order*, affording individual NGDCs flexibility throughout its directives to design a mechanism that best fits the individual utility system; the Commission did not require, as RESA suggests in its most recent set of comments, consistency among the various account number access mechanisms. The Commission, in its *Tentative Order*, noted “requests for flexibility in the potential NGDC implementation of an account number access mechanism” and allowed for “other possible and effective methods for NGS account number access that may be more appropriate in their [NGDC] service territories.”¹⁰ EAP asks the Commission to move forward under the *Final Order* as it currently reads rather than reconsider the fundamental characteristics or attributes of the account number access mechanism in the course of reviewing the NGDC compliance plans that are scheduled for implementation this summer.

Further, EAP believes it is premature to consider “any feature that would increase the usefulness of these mechanism” before the mechanism has been approved and implemented.

⁸ EAP will not be surprised if RESA files yet another round of comments to respond to the March 15 Secretarial Letter which, in turn, may necessitate a response from other stakeholders depending on its content.

⁹ *Final Order*, at p. 6.

¹⁰ *Tentative Order*, at p. 11

See, Secretarial Letter Re: Natural Gas Distribution Company Customer Account Number Access Mechanism for Natural Gas Suppliers, Docket M-2015-2468991 dated March 15, 2016 at p. 1. As set forth in the chart attached hereto as an Appendix, the NGDC compliance plans currently pending before the Commission address each and every account number access mechanism attribute required under the *Final Order* and are compliant and ripe for approval. To reopen the proceeding by means of an untimely and flawed request for reconsideration will only serve to delay implementation of the Commission directive to develop and implement a tool by August 31 that suppliers claim is needed to increase shopping and grow the retail market. EAP urges the Commission to proceed to examine the compliance plans as submitted but believes that, if the Commission is to now add a new feature to the mechanism, NGDCs will need additional time to resubmit compliance plans and implement the reconfigured account number access mechanisms when approved.

B. Compliance Plans Submitted by NGDCs Meet the Requirements Set Forth in the *Final Order*.

The Commission, in its *Final Order*, required that NGDC compliance plans contain the following components¹¹:

- The plan must outline the development of a username and passcode-protected secure website portal that will, upon customer request and consent, provide the NGSs with access to residential and small business customer account numbers that are not available on the NGDC's ECL.
- The plan must include expected costs, proposed cost recovery mechanism, and appropriate level of cost allocation.

¹¹ *Final Order* at p.33.

- The mechanism itself must require an NGS to submit the customer’s full name, service street address, and five-digit postal code.
- The mechanism itself must also document 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 LOA from that customer.
- The mechanism must return the requested account number if a match exists.
- The mechanism must keep track of the usage of the system and be able to identify who accessed what data and when.
 - The information must be retained by the NGDC for three years and be easily accessible to regulators upon request.

The Commission’s *Final Order* agreed with RESA that wildcard and/or drop-down boxed would be a beneficial tool, but stopped short of requiring them due to concerns about possible effects on customer privacy and related protections.¹² The Commission “strongly encouraged” the NGDCs to consider these options, following RESA’s comments to the *Tentative Order* that they be required at the outset¹³ and asked NGDCs to provide a “reasonable” explanation as to why they would not be included in submitted compliance plan.¹⁴ This requirement is in line with RESA’s request in its comments to the *Tentative Order* for NGDCs to either “include these features in their plans or explain why they may not be compatible with existing customer databases or may produce an increased risk of false returns.”¹⁵ Reasonableness of the explanation in the compliance plan is subject to Commission, not RESA’s, review and interpretation. All companies with the exception of one, which did not immediately address the

¹² *Final Order* at p. 11.

¹³ RESA Comments to *Tentative Order* at pp.6-7.

¹⁴ *Final Order* at p. 12.

¹⁵ RESA Comments to *Tentative Order* at pp.6-7.

issue, did provide customer privacy as the reason for exclusion. *See*, Appendix attached hereto and incorporated herein.

With regard to mechanism outputs, the Commission only specifically directed that either the customer's account number, "NO HIT," or "MULTIPLE HITS" be required. Further, the Commission required that any "NO HIT" or "MULTIPLE HIT" indicator would allow for resubmittal by the NGS for the same customer with corrected information.¹⁶ To the extent that an NGDC wishes or has the IT systems ability to allow for additional outputs, the Commission allowed for their inclusion in the compliance plans. RESA made no mention in its comments to the *Tentative Order* that it wished to have the Commission consider requiring the mechanisms to provide error codes or identify the fields which contained an error in attaining a match, which it could have at that time. Presumably RESA would have had a similar experience with EDCs and the electric utilities' account number access mechanisms to ask for such a feature to be considered by the Commission for requirement of the NGDCs' mechanisms. RESA did ask for the opportunity to submit corrected information in the instance of a "NO HIT" or "MULTIPLE HITS" in order to arrive at the correct customer account number.¹⁷ The Commission did make this request of the NGDCs' compliance plans and each of the companies' mechanisms will afford this opportunity for supplier agents.

RESA points out that the NGDC proposals vary "greatly" on the alternative approaches they will take if the initial information entered by the NGS does not produce the account number.¹⁸ The Commission, however, allowed for and supported variation in approach to designing account number access mechanism in both its *Tentative Order* and *Final Order*.

¹⁶ *Final Order* at p. 24.

¹⁷ RESA comments to *Tentative Order* at p. 9.

¹⁸ RESA comments to *Final Order* at p. 5.

RESA further implies that inherent flaws in NGDC *and* EDC customer databases cause difficulties.¹⁹ To suggest that utilities revamp their entire customer information systems whole-cloth in order to minutely improve the functionality of a customer account access mechanism is both unreasonable and imprudent. For a supplier agent to re-type a last name or street address is not comparable to the effort and cost that would be involved to undertake a wholesale change to a utility's information system.

Further, RESA makes its own "cost recovery proposal," arguing that the Commission did not address NGS cost-sharing in the *Tentative Order*.²⁰ However, the Commission's *Tentative Order* did provide for parties to include in their comments proposed methods for potential "allocation and recovery" of associated costs, with "allocation" presumably and understandably applying to the entities who wish to make use of the mechanism, namely NGSs.²¹ In twenty-five pages of requests for additional NGDC requirements at a cost to all residential consumers, RESA makes no offer for NGSs to shoulder any of the associated costs. RESA further argues against any POR discount where "all NGSs [would pay] for the mechanism, while only a small portion of NGSs may use it," but fails to make a similar comparison for cost sharing among consumers – all of which would pay for it through an NGDC rider or surcharge, while only a small portion may "benefit" from its use.²²

In sum, the totality of RESA's comments should be summarily dismissed without further consideration. Each individual NGDC's compliance plan meets the directives and criteria laid out by the Commission in the *Final Order*. See Appendix attached hereto and incorporated by reference. RESA makes no allegations in their most recent comments that the

¹⁹ RESA comments to *Final Order* at p. 6.

²⁰ RESA comments to *Final Order* at p. 14.

²¹ *Tentative Order* at p. 17.

²² RESA comments to *Final Order* at p. 16.

plans do not wholly adhere to the Final Order and instead seeks to revisit a host of issues related to the mechanism, to the use of the ECL by suppliers and even to the components of the consolidated bill. *See*, RESA's comments to the Final Order at p. 8, *fn* 12. Each of which have previously been decided by the Commission.

Insofar as the Commission wishes to revisit any of the issues raised by RESA in its comments and previously addressed by the Commission in the *Final Order*, EAP maintains that new directives would likely require additional time for companies to implement the mechanism. Furthermore, EAP contends that any new criteria suggested by RESA in this fourth round of comments would necessarily merit response by NGDCs, push off implementation and increase costs. Based on the initial January 8, 2016 compliance plan submittal date and required deadline for functionality set at August 31, 2016, a number of EAP's member companies have already begun work on their mechanisms primarily due to the compressed implementation timeframe but also with the understanding that the plans submitted would be reviewed in connection with the compliance requirements as outlined in the *Final Order*. A revisiting of the requirements as suggested by RESA and even the question raised in the March Secretarial Letter inevitably increase the costs to the utilities and their ratepayers as well as require additional time to develop and implement any subsequently approved mechanism.

EAP's member companies have a limited number of IT resources – that is, only so many employees can do this technical work and only so many modifications or additions can be made to their systems at a time. Often, IT systems' resource allocation is scheduled out months to years in advance. By the time companies are filing their compliance plans in January, they have already begun the programming work necessary in order to meet the Commission's

proposed deadline. To do otherwise would leave insufficient time to complete the work by the August 31, 2016 deadline and raise the risk of non-compliance with the mandated deadline.

For comparison, the EDCs' customer account number access mechanism Final Order by the Commission was entered on July 17, 2013. Plans were required to be filed within six months, or by January 17, 2014. The Commission approved those plans on May 23, 2014, extending the initial operational deadline from May 2014 to November 1 to December 31, 2014, depending on the individual company plans.²³ That is, due to the delay in the approval timeframe, the Commission subsequently afforded the companies a minimum of five months to complete implementation. EAP believes without an expedited Commission approval of the NGDC compliance plans as filed, a similar extension for the implementation deadline will become necessary.

C. Additional Issues Raised by RESA are Outside the Scope of this Proceeding.

RESA makes additional claims outside the scope of this proceeding in its comments relating to, *inter alia*, the use of the mechanism in the electric retail market, the use of the ECL and the development of the consolidated bill required by the Commission in its *Final Order Re: Investigation of Pennsylvania's Retail Natural Gas Market: Joint NGDC – NGS Bill*, Docket No. M-2015-2474802 entered August 20, 2015. See RESA comments to *Final Order* at p. 8 *fn* 12. None of these points should be revisited by the Commission in the context of this proceeding on account number access mechanisms. Moreover, throughout their most recent set of comments, RESA repeatedly justifies its request to revisit issues already resolved by the Commission by alleging that without having readily-available access to shopping, customers are “deprived of

²³ *Final Order Re: EDC Customer Account Number Access Mechanism for EGSs*, Docket No. M-2013-2355751.

lower prices, more stable prices and/or access to innovative product offerings and other value-added services.”²⁴ RESA provides no information to support its bold assertions.

Moreover, RESA neither defines nor identifies the “other value-added services” offered by its members to encourage customers to shop in Pennsylvania, which is the goal of the instant investigation and action plan outlined by the Commission in its *Gas RMI Final Order*. The fact that “85% of consumers are not shopping for natural gas” may merit further discussion among the Commission and stakeholders but it does not justify a re-opening of the *Final Order* concerning the account number access mechanism. EAP and its members support competition in the retail market as set forth in the Natural Gas Choice and Competition Act²⁵ and the Commission’s obligations under that statute. EAP believes that the *Final Order* balances the desire of suppliers to have ready access to account information when marketing to potential customers with the customer’s right to privacy and desire for non-intrusive sales/marketing practices and asks the Commission to move forward in this effort rather than entertain the oft-repeated claims of RESA.

III. CONCLUSION

EAP respectfully requests that the Commission look to its *Final Order*, reject the rehashed arguments advanced by RESA as an untimely and invalid request for reconsideration, and judge the compliance plans submitted by the NGDCs in January on the basis of the compliance criteria outlined by the Commission in July 2015. EAP does not believe that the time is ripe to look for “any feature which would increase the usefulness” of the account number access mechanism primarily because the mechanism is not yet in place in the natural gas retail market and because

²⁴ RESA comments to *Final Order* at pp. 2 and 16.

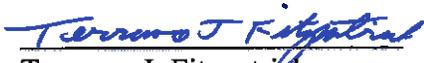
²⁵ See, 66 Pa. C.S. §2201-2212.

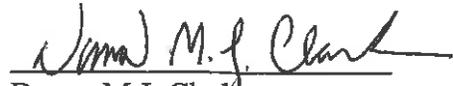
any additional feature added now would have been identified basis on speculation or conjecture rather than experience.

Further, to the extent the Commission chooses to add another feature at this point in the review process, EAP contends that additional time must be provided to amend, approve, and implement the compliance plans submitted by the NGDCs earlier this year. This would not meet the Commission goal as stated in the *Final Order* to ensure that the account number access mechanism was in place for the fall – the NGSs’ prime marketing season.

Accordingly, EAP requests that the Commission move forward to review and rule upon the compliance plans submitted by NGDCs in January 2016.

Respectfully submitted,


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APPENDIX--ARE THE COMPANIES' PLANS COMPLIANT WITH THE FINAL ORDER?

FINAL ORDER REQUIREMENT	Columbia	NFG	PECO	Peoples	PGW	UGI
Outputs of Acct #, "NO HIT," "MULTIPLE HITS"; allow for NGS to resubmit	COMPLIANT	COMPLIANT	COMPLIANT	COMPLIANT	COMPLIANT	COMPLIANT
Mechanism will keep track of system usage e.g. who accessed what data when	COMPLIANT	COMPLIANT	COMPLIANT	COMPLIANT	COMPLIANT	COMPLIANT
Wild cards / drop down box reason given if not included	COMPLIANT Wildcards open to inadvertent customer information release; will have optional fields for NGS use instead	COMPLIANT Potential to degrade customer privacy	COMPLIANT Use of such inputs increase risk of inadvertent erroneous match / false return;	COMPLIANT Wildcard for first name or business name with exact match on other fields;	COMPLIANT Future input field functionality possible, but none at this time due to customer privacy concerns	Plan does not address