



**National Fuel**

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**Maureen Geary Krowicki**  
*Assistant General Counsel*

July 29, 2016

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

RE: Second 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") Second Compliance Plan Filing pursuant to the Commission's Order entered on June 30, 2016 ("Order") in the above-captioned docket addressing NFG's January 8, 2016 Compliance Plan ("Initial Compliance Plan"). In the instant filing, NFG amends its Initial Compliance Plan to address the issues noted on pages 23-25 of the Order.

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

Sincerely,

Maureen Geary Krowicki  
Assistant General Counsel  
National Fuel Gas Distribution Corporation

MGK/blh

Encl.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY  
COMMISSION**

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

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**NATIONAL FUEL GAS DISTRIBUTION CORPORATION'S  
SECOND COMPLIANCE PLAN FILING  
REGARDING NGS ACCESS TO NGDC CUSTOMER ACCOUNT NUMBERS**

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**I. INTRODUCTION**

On July 8, 2015, the Pennsylvania Public Utility Commission (“Commission”) entered its Final Order regarding Natural Gas Supplier (“NGS”) Access (“Final Order”) 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” or “ANAM”) 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 filed its compliance plan (“Initial Compliance Plan”) in response to the Final Order. On June 30, 2016, the Commission issued an Order (“Order”) rejecting NFG’s Initial Compliance Plan and directing NFG to submit, within 30 days of the entry date of the Order, a revised plan per the directives outlined in the Order. In the instant filing, NFG amends its Initial Compliance Plan to address the issues noted on pages 23-25 of the Order.

**II. REVISED IMPLEMENTATION PLAN**

NFG will develop a password-protected secure website portal that will provide NGSs with access

to customer account numbers for those ECL eligible accounts that are not available on the NGDC's ECL. Upon entry by the NGS of its username and passcode, the portal will provide access to NFG customer account numbers. The design for NFG's Account Number Access Mechanism incorporates the following features:

1. Require an NGS to submit the customer's full name, service street address and five-digit postal code.
2. Document the NGS's attestation that it is enrolling the customer in a public location and that they have obtained a photo ID and a signed LOA from the customer.
3. Have a field where the form of customer identification must be documented.
4. Require the NGS to enter a CAPTCHA<sup>1</sup> or equivalent code to add a layer of security designed to further protect customer data.
5. If 1.-4. are provided successfully, return the requested account number if a match exists for residential and non-residential customers with annual consumption less than 1000 Mcf.
6. Provide an indication of whether or not the customer's account number is available through the ECL.

The Order states that NFG does not clearly define how NGSs will attest to the receipt of a signed LOA, a customer's photo ID or that the enrollment is occurring in a public location.<sup>2</sup> NFG clarifies that NGSs will be presented with a free-form entry field in which they will identify the form of customer photo ID. Upon provision of this information, the ANAM web screen will display a statement as follows:

Supplier attests that it has obtained a signed (handwritten or electronic) letter of authorization from the customer in a public venue.

The NGS will be presented with a check-box to affirm the statement and a CAPTCHA code. If the box is not checked and CAPTCHA code is not input, NFG's ANAM will not proceed to the entry screen where the NGS will submit the customer's full name, service street address and five-digit postal code input. As provided in the Initial Compliance Plan, NFG's Account Number Access Mechanism will keep a record of activity/information collected by the portal which will be retained for three years and have the

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<sup>1</sup> CAPTCHA ("Completely Automated Public Turing test to tell Computers and Humans Apart") is a type of challenge response test used in computing to determine whether or not the user is human. This is used to protect against potentially malicious applications that run automated tasks that are both simple and structurally repetitive, at a much higher rate than would be possible for a human alone.

<sup>2</sup> Order, p. 25.

ability to be easily provided to regulators upon request. As directed in the Order,<sup>3</sup> NFG clarifies the information retained by the ANAM will include when the mechanism was accessed; the entity accessing the system; and the output of the access attempt, including any data provided to the NGS.

Also as directed in the Order,<sup>4</sup> NFG clarifies that its ANAM will respond to queries that do not result in an account match or in more than one account match with “NO HIT” or “MULTIPLE HITS” responses, respectively. NFG also clarifies that the ANAM’s response to invalid data provided in a query field will be to display the field contents in a different color than query fields with valid data. Further, the ANAM will allow the NGS to modify the incorrect query field and resubmit the query.

### **III. COST RECOVERY**

NFG does not anticipate that modifications/clarifications to its ANAM presented herein will materially alter the cost estimate presented in the Initial Compliance Plan.<sup>5</sup> In a departure from the cost recovery plan presented in the Initial Compliance Plan, given the modest cost of developing the ANAM and the use of internal resources, NFG will not seek cost recovery at this time. Should additional unforeseen costs emerge, NFG reserves the right to file a revised cost recovery plan.

### **IV. IMPLEMENTATION DATE**

In its Initial Compliance Plan, NFG proposed that it receive an extension to implement its ANAM until January 2, 2017. In the Final Order, the Commission directed that the mechanisms be in place and operational no later than August 31, 2016; however, as discussed in its Orders addressing the other NGDC compliance plans, the Commission extended the deadline until December 31, 2016.<sup>6</sup> NFG expects that it will be able to implement by this new deadline and will not request an extension in the instant filing.

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<sup>3</sup> Order, pp. 24-25.

<sup>4</sup> Order, p. 23.

<sup>5</sup> Initial Compliance Plan, p.4.

<sup>6</sup> Order, p. 25.

**V. CONCLUSION**

WHEREFORE, NFG requests the Commission accept the instant Account Number Access Mechanism compliance plan.

Respectfully submitted,



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