



THOMAS T. NIESEN
Direct Dial: 717.255.7641
tniesen@ttanlaw.com

April 20, 2009

HAND DELIVERY

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P. O. Box 3265
Harrisburg, PA 17105-3265

In re: Docket No. L-00060182 - Electronic Billing Programs
Rulemaking to Amend the Provisions of 52 Pa. Code Chapter 56 to Comply with
the Provisions of 66 Pa. C.S., Chapter 14; General Review of Regulations

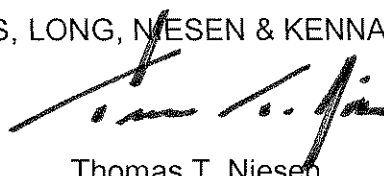
Dear Secretary McNulty:

By secretarial letter dated March 31, 2009, the Public Utility Commission directed utilities that have adopted Electronic Billing Programs to file comments regarding their individual Programs. In accordance with the March 31 secretarial letter, enclosed for filing on behalf of Equitable Gas Company, LLC are an original and fifteen (15) copies of its Comments concerning its Electronic Billing Program. A copy in electronic format is also provided on the enclosed CD-R.

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By



Thomas T. Niesen

cc: Terrence J. Buda (by email w/encl.)
Patti Wiedt (by email w/encl.)
Cyndi Page (by email w/encl.)
Daniel Mumford (by email w/encl.)
Sandra L. Gagorik (w/encl.)
Daniel L. Frutchey, Esquire (w/encl.)

090420-McNulty (Comments to EBilling).wpd

**Rulemaking to Amend the Provisions of
52 Pa. Code Chapter 56 to comply with the
Provisions of 66 Pa. C.S. Chapter 14;
General Review of Regulations
Docket No. L-00060182**

Pursuant to the Secretarial Letter dated March 31, 2009, Equitable Gas Company submits the following responses related to the implementation of its Electronic Billing Program.

Overview and Description

On August 7, 2008, the Pennsylvania Public Utility Commission approved a petition granting Equitable Gas Company, LLC (“Equitable” or “Company”), at Docket No. P-00072341, a partial, temporary, limited exemption of 52 Pa. Code §56.21 relating to calculation of billing date and physical delivery of a paper bill. The waiver was granted for a period of three years and requires Equitable to submit a report related to participation and complaints relative to electronic billing within 24 months.

In December, Equitable began to provide customers with the opportunity to receive and pay bills online, instead of receiving a paper bill by physical delivery through the mail. Equitable Gas uses a “Biller Direct” model, where customers may enroll in Electronic Billing by either contacting a representative at Equitable’s Customer Care Center or by enrolling electronically on the Company’s website. Customers who are enrolled in Electronic Billing no longer receive a physical bill by mail. Instead, the customer receives an email notification directly from Equitable stating that the bill has been posted and is ready to be viewed online.

The Electronic Billing option is available to all of the Company’s Pennsylvania residential and small commercial customers. New customers, by default, receive bills by mail, and only become Electronic Billing participants if they actively enroll in the service.

Participation

During the four months that Electronic Billing has been available, approximately 1,300 customers have enrolled in the service and are now receiving their monthly gas bill electronically. This represents about 0.5 percent of the eligible customer base.

Tariff Revisions

The Company determined it was not necessary to make any revisions to its tariff to implement Electronic Billing.

Changes Since the Inception of Electronic Billing

The initial focus of Electronic Billing was to provide the customer with access to their account online, to provide the customer with the ability to sign up for automatic payment and to permit the customer to contribute to the Dollar Energy Fund. The Company is currently working on an initiative to enhance payment options and give customers the option to provide electronic feedback to Equitable as they use the Company's website for Electronic Billing services. The Company anticipates an early summer release date for this initiative.

Bill Inserts and Communications

Equitable did not announce the initial phase of Electronic Billing with a bill insert and, therefore, is pleased at the participation level to date. Customers may hear about the Electronic Billing service during normal communications with our Customer Care Center representatives, or see the option when visiting www.equitablegas.com. The Company will provide a bill insert alerting customers to this option in the second or third quarter of 2009.