



375 N. Shore Drive, Suite 600
Pittsburgh, PA 15212

www.peoples-gas.com

Jennifer L. Petrisek
Senior Attorney
Phone: 412-208-6834
Fax: 412-208-6577
Email: Jennifer.Petrisek@Peoples-Gas.com

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MAR 2 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Via Electronic Filing

March 2, 2015

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

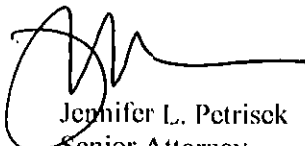
Re: Docket No. M-2014-2448824 - Act 155 of 2014 (Chapter 14) Implementation

Dear Secretary Chiavetta:

On behalf of Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively “Peoples” or the “Company”), attached for filing are the Comments of Peoples to the Tentative Order for Chapter 14 Implementation in Docket Number M-2014-2448824.

Please contact the undersigned at (412) 208-6834 should you have any questions or concerns regarding this matter.

Very truly yours,



Jennifer L. Petrisek
Senior Attorney

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Act 155 of 2014 (Chapter 14) Implementation :

M-2014-2448824

COMMENTS TO THE CHAPTER 14 IMPLEMENTATION TENTATIVE ORDER
BY PEOPLES NATURAL GAS COMPANY LLC, PEOPLES NATURAL GAS COMPANY LLC
– EQUITABLE DIVISION AND PEOPLES TWP LLC

On October 22, 2014, Governor Corbett signed into law HB 939, or Act 155 of 2014 (“Act 155”). This law, which became effective on December 22, 2014, reauthorized and amended Chapter 14 of the Public Utility Code (66 Pa. C.S. §§ 1401-1419), Responsible Utility Customer Protection. The amendments made to Chapter 14 by Act 155 supersede a number of current Chapter 56 regulations, and as such, the Pennsylvania Public Utility Commission (“PUC” or “Commission”) has been charged with revising Chapter 56 and promulgating regulations to administer and enforce the revised Chapter 14.

On January 15, 2015, the PUC issued a Tentative Implementation Order for Act 155 (“Tentative Order”) in order to address certain issues that may be in need of immediate Commission guidance as to their interpretation and implementation. The Commission identified two such areas: (1) Section 1403, Definition of *Medical Certificate* and (2) Section 1410.1(3) and Section 1410.1(4), utility reporting requirements concerning accounts with arrearages in excess of \$10,000.00 and annual reporting of medical certificate usage.

Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively the “Company” or “Peoples”) respectfully submits these comments for consideration by the Commission as it promulgates regulations to administer Chapter 14. The Company expects that the Energy Association of Pennsylvania (“EAP”) will file comments in this proceeding, on behalf of its electric distribution company and natural gas distribution company members. The Company has previewed the EAP comments and supports the suggestions and analysis provided by EAP. The Company’s comments today are in addition to those submitted by EAP.

A. Defining Active Accounts - Reporting Requirements for Accounts Exceeding \$10,000 in Arrearages.

Section 1410.1(3) of Chapter 14 requires utilities to provide an annual report to the Commission regarding residential customer accounts with accumulated arrearage of \$10,000 or more. The report is intended to demonstrate the efforts taken by the utility to collect on those accounts with the largest accumulated arrearages. In their comments, EAP suggests that the annual report would relate to active accounts and would exclude certain categories such as accounts in Customer Assistance Programs with frozen (uncollectable) arrearages. The Company would further suggest that the annual report also exclude those accounts in which a portion, or all, of the arrearages are being pursued through active civil litigation, or have been separated on the active account by means of the utility obtaining, but not yet collecting on, a civil judgment.

B. Establishing Data Points - Reporting Requirements for Accounts Exceeding \$10,000 in Arrearages.

In the Tentative Order, the Commission identifies specific data points to be included in annual report. In addition to those identified data points, the Company suggests that the following would provide information useful to evaluate the history and activity on the higher-arrearage accounts:

- (1) **Meter Access.** In certain instances, the Company must proceed with termination procedures in order to obtain payment on a past-due account. Meter access may hinder the Company's ability to proceed with actual termination of a natural gas account in the event the customer does not pay their past-due bill. For example, the Company may be unable to obtain access to an inside meter as the property owner or customer will not allow access to the portion of the property where the meter is located (i.e. meter is located in a locked basement). The Company may also be unable to terminate for non-payment on a specific account if the natural gas account meter is located on a manifold, or if the meter or curb-box is obstructed/blocked by a vehicle, a large immovable item, inaccessible fences, or chained animals. While the Company is diligent and continues to attempt to obtain access to the meter and/or curb box, and to ensure the safety of its equipment and customers, there are instances when inaccessible meters and blocked/obstructed meters and curb boxes hinder the Company's ability to proceed with termination of a specific account, thus resulting in increased arrearages.

- (2) **Medicals Certificate Status.** Active termination processes are deferred upon notification that a member of the household suffers from a medical condition that would be worsened by the termination of utility service. Although Chapter 14 requires summary-level reports on the medical certificates, the Company believes that it is important to know the status of medical certificates on higher-arrearage accounts as a medical certificate, or a series of medical certificate renewals, may result in increased, or stayed arrearages. Peoples suggests the Section 1410.1(3) report should include a data point to identify if the customer has an active medical certificate as well as how many medical certificates have been accepted in the prior two (2) year period.

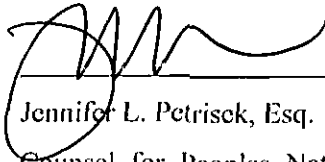
C. Establishing Data Points - Reporting Requirements regarding Medical Certificates.

Section 1401.1(4) of Chapter 14 requires utilities to provide an annual report to the Commission of the number of medical certificates and renewals submitted and accepted. This information may allow the Commission and the Utilities to understand the importance of these protections to certain customers, as well as the impacts upon the collection practices of the utility. The Company suggests that the annual report should be comprised of the following information:

- (1) **Requested Medical Certificates.** This number would include all medical certificates requested by the residential class of customers – including initial and renewal certificates. Upon the request for a medical certificate, as discussed above, active termination processes are deferred. This data point is important as it provides a snapshot of the number of times active collection processes are deferred.
- (2) **Accepted Medical Certificates.** This number would include all medical certificates timely returned by medical professions – including initial and renewal certificates. This data point is important for two reasons: (a) it provides a snapshot of the number of times a medical hold is invoked thus protecting an account from further collection activities and (b) by subtracting the total accepted medical certificates from the total requested medical certificates, a snapshot of the number of un-completed requests will be apparent. While there may be many reasons for an un-completed medical certificate, knowing the rate at which this occurs may assist in understanding the number of “holds” placed on accounts by utilities.

Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC appreciates the opportunity to provide comments and respectfully requests that the Commission consider the Company’s foregoing comments as it promulgates regulations to administer Chapter 14.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer L. Petrisek", is written over a horizontal line. The signature is stylized and cursive.

Jennifer L. Petrisek, Esq.

Counsel for Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division & Peoples TWP LLC

Date: March 2, 2015

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