

DATE OF DEPOSIT

JUN - 1 2021

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



Titan Gas, LLC DBA CleanSky Energy
ptoranzo@cleanskyenergy.com

June 1, 2021

M-2020-3019254-AEL-6/30/21

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

~~M-2020-3019202~~

RE: Comments on Tentative Order Supplier Door-to-Door and In-Person Marketing Moratorium, Proclamation of Disaster Emergency – COVID-19 at Docket M-2020-3019254 Titan Gas LLC dba CleanSky Energy (“CleanSky Energy”) (Utility Code: 1118543)

Dear Ms. Chiavetta,

CleanSky Energy agrees with and supports the timing of the Commission’s approach to initiate a process to address the further modification or lifting of the Commission’s March 16, 2020 Emergency Order. The safety and health of our staff and the public are our top priorities for us. We read and discussed the Tentative Order regarding Supplier Door-to-Door and In-Person Marketing Moratorium and as an interested stakeholder, we would like to provide the following comments and attached confidential documents for review by the Commission’s Law Bureau and the Office of Competitive Market Oversight in support of our positions which addresses the following:

- **Identify the metrics that the Commission may use to determine whether to modify or lift the marketing moratorium.**
 - From a public health and safety aspect, CleanSky Energy believes the commission should take into consideration the same data used by the Governor’s office to revise and lift previously imposed COVID-19 mitigation measures and restrictions as a guide to address and suspend the current supplier door to door and In -person marketing moratorium.
- **Propose any conditions to which the Commission should subject suppliers when we modify or lift the Emergency Order.**
 - CleanSky Energy would like to propose that all suppliers approach re-entry into the state of Pennsylvania as if it were a brand-new market. Therefore, suppliers should conduct a soft launch with a small number of agents in the field (5-10) for a period of 2-3 weeks. Then suppliers should conduct a field audit visit to ensure field agents and managers are adhering to all measures implemented by the commission and the supplier regarding public health and safety. Once the audit is signed off as satisfied by the supplier, the supplier may ramp up resources in the field and conduct periodic field audit visits.
- **Address measures to ensure public health and safety, the duration of such measures, and the metrics for later eliminating such measures.**



- CleanSky Energy recommends that Suppliers should be required to develop and provide the Commission with their internal requirements & health safety guidelines for best practices that must be followed by all vendors and field agents. We have included a copy of our internal guide as an example. Please see the attached **Item A**.
- CleanSky Energy recommends that Suppliers should be required to obtain from each individual field agent a completed and signed Training Acknowledgement form. The form should include language stating that the agent confirms to completing refresher training regarding the supplier's program, state specific marketing requirements, and training regarding appropriate COVID-19 health and safety measures, including the use of appropriate Personal Protective Equipment, and other steps recommended by the respective state's Department of Health, Centers for Disease Control and Prevention and the supplier's best practices procedures. Please see the attached **Item B**.
- **Comment on the need for suppliers to attend Commission remote training to refresh their understanding of the Commission's marketing regulations before resuming these sales and marketing activities.**
 - CleanSky Energy supports the idea for all suppliers to attend a remote/virtual commission training as a refresher program and to ensure vendor training materials are up to date and in order. We are not opposed to this position.
- **Comment on the need for any additional monitoring, oversight, or reporting requirements for supplier contractors, vendors, and agents beyond those found at 52 Pa. Code § 111.1410.**
 - CleanSky Energy believes that so long as the above requirements or similar requirements are put in place and complied with by all suppliers that the need for additional monitoring, oversight, or reporting may not be necessary afterwards. Suppliers will still comply with the requirement of notifying the Bureau of Consumer Services and each respective utility regarding D2D notification per 52 Pa. Code § 111.1410.

We thank you for the opportunity to share our comments and we are more than available to discuss further any position that will assist the commission in safely opening this sales channel for the benefit of our customers and the state of Pennsylvania. If you have any questions regarding this submission, or require additional information, please contact me directly at 845-216-6979.

Respectfully,

A handwritten signature in black ink, appearing to read "Paul Toranzo", is written over a printed name.

Paul Toranzo

Vice President, Mass Marketing & Development

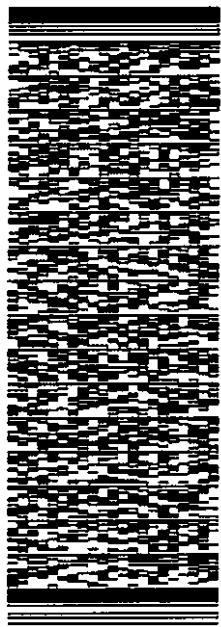
Enclosure

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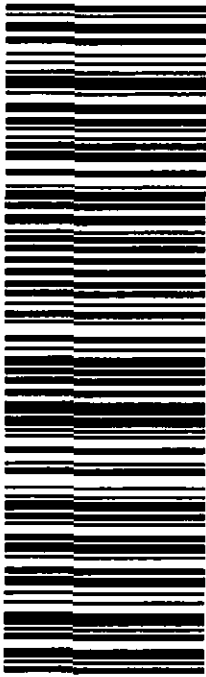


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