**PENNSYLVANIA**

**PUBLIC UTILITY COMMISSION**

**Harrisburg, PA 17105-3265**

 Public Meeting held August 20, 2015

Commissioners Present:

Gladys M. Brown, Chairman

John F. Coleman, Jr., Vice Chairman

James H. Cawley

Pamela A. Witmer, Statement

Robert F. Powelson

Investigation of Pennsylvania’s M-2015-2474802

Retail Natural Gas Market:

Joint Natural Gas Distribution Company –

Natural Gas Supplier Bill

**FINAL ORDER**

BY THE COMMISSION:

Before the Pennsylvania Public Utility Commission (Commission) are recommendations from the Commission’s Office of Competitive Market Oversight (OCMO) for enhancing the natural gas supplier (NGS) information available on the natural gas distribution company (NGDC) bill. Specifically, OCMO recommends the inclusion of the NGS’s logo on the bill, the expansion of bill messaging space allotted to NGSs and the inclusion of a Shopping Information Box. The Commission believes that these three proposals will aid the customer in not only developing a stronger recognition of, and relationship with, his or her NGS, but will also increase customer awareness when participating in the competitive retail natural gas market.

# BACKGROUND

During its Investigation of Pennsylvania’s Retail Electricity Market (Electric RMI), this Commission directed OCMO to provide recommendations, by the end of 2013, on how the existing electric utility-consolidated bill could be more supplier-oriented.[[1]](#footnote-2) OCMO’s inquiry could include, but not be limited to, making the electric generation supplier’s (EGS) information more prominent; including the EGS’s logo on the electric distribution company’s (EDC) bill; providing increased spacing for EGS messaging and potentially allowing EGS bill inserts. The Commission stated that the “expected end-result would look more like a joint EDC-EGS bill.”[[2]](#footnote-3)

The Commission adopted OCMO’s recommendations regarding a joint EDC-EGS bill via a Final Order on May 22, 2014.[[3]](#footnote-4) In the Joint EDC-EGS Bill Final Order, the Commission directed the EDCs to implement, by June 1, 2015, the following billing changes: 1) include the EGS’s logo on the EDC bill;[[4]](#footnote-5) 2) expand the EGS bill messaging space from two (2) to four (4) lines with up to 80 characters each; and, 3) include a Shopping Information Box that provides a customer’s account/customer supplier identification (ID) number (whichever is needed to effectuate a switch in electric generation supplier), the customer’s Rate Schedule and an indication that this information is needed when shopping with an EGS.[[5]](#footnote-6) The Commission believed the inclusion of this information would aid customers in not only developing a stronger recognition of and relationship with their supplier, but would also increase customer awareness when participating in the competitive retail energy market.[[6]](#footnote-7)

On December 18, 2014, we issued a Final Order at Docket No. I‑2013-2381742 (hereinafter Gas RMI Final Order), announcing specific topics and issues that we intend to pursue in our Investigation of Pennsylvania’s Retail Natural Gas Supply Market (Investigation or Gas RMI).[[7]](#footnote-8) Through the Gas RMI Final Order, we outlined our priorities and finalized specific action plans to be undertaken by OCMO, including the establishment of working groups and our intent to propose regulations on specific issues. We stated that a joint NGDC-NGS bill may provide customers with an increased recognition of their suppliers and aid in the development of the relationship between NGSs and customers. Additionally, we maintained our position that the inclusion of supplier information on the utility-consolidated bill may increase customer awareness when participating in the competitive retail natural gas market. Therefore, we directed OCMO to develop recommendations no later than the second quarter of 2015 regarding the applicability of a joint NGDC-NGS bill. With that goal, the Commission directed stakeholders to submit to OCMO, at ra-ocmo@pa.gov, by February 28, 2015, informal comments[[8]](#footnote-9) on the supplier-related elements and requirements that would be most appropriate for inclusion on the utility-consolidated bill.[[9]](#footnote-10)

 The following parties submitted informal comments to OCMO regarding the implementation of a joint NGDC-NGS bill: the Energy Association of Pennsylvania (EAP); PECO Energy Company (PECO); the Pennsylvania Energy Marketers Coalition (PEMC); Philadelphia Gas Works (PGW); Retail Energy Supply Association (RESA); UGI Utilities, Inc. – Gas Division, UGI Penn Natural Gas, Inc. and UGI Central Penn Gas, Inc. (collectively, UGI).

 Following its review of the informal comments, OCMO submitted to the Commission its proposals for implementing a joint NGDC-NGS bill. The Commission adopted for comment OCMO’s proposals at its April 23, 2015 Public Meeting.[[10]](#footnote-11) Comments were due June 8, 2015.

 The following parties submitted comments to the Commission’s Tentative Order: Columbia Gas of Pennsylvania, Inc. (Columbia); EAP; the Office of Consumer Advocate (OCA); PECO; PEMC; Peoples Natural Gas Company LLC, Peoples Natural Gas Company LLC – Equitable Division and Peoples TWP LLC (collectively, Peoples); PGW; Pike County Light and Power Company (PCL&P); RESA and UGI.

# DISCUSSION

 The Public Utility Code, through the Natural Gas Choice and Competition Act, empowers the Commission to license NGSs and establish standards to govern the conduct of NGSs to ensure that all customer classes may choose to purchase natural gas from an NGS. 66 Pa. C.S. §§ 2208(a), 2208(f) (citing Chapter 56 of Commission regulations regarding Standards and Billing Practices). This Commission strives to ensure that customers receive clear, adequate, accurate and timely information from both NGSs and NGDCs. *See* 66 Pa. C.S. § 2206(c). NGSs must provide accurate information about their services using plain language and common terms in communications with customers. 52 Pa. Code § 62.114(1). NGDCs must adhere to Commission orders and regulations regarding the billing of customers. 66 Pa. C.S. § 2205(c)(1); *see* 52 Pa. Code §§ 56.15, 56.265 (Billing information) and 62.74 (Bill format for residential and small business customers).

 Based on the informal feedback received from stakeholders, the Commission proposed three changes to utility-consolidated bills to make them more supplier-oriented: the inclusion of the NGS’s logo on the NGDC bill; an expansion to the bill messaging space provided to NGSs; and the inclusion of a Shopping Information Box. Informal comments were provided regarding the inclusion of NGS inserts. While the Commission did not recommend the inclusion of NGS inserts at this time, we requested that more information be provided. The Commission also specifically requested that cost estimates and recovery proposals be provided based on its proposals, as well as any additional proposals provided within comments. Lastly, the Commission proposed that these changes be implemented no later than June 1, 2016, and requested comments on this proposed deadline.

**A. Commission Proposals**

 **1. Inclusion of the NGS’s Logo**

In our Gas RMI Final Order, the Commission directed OCMO to review, among other suggested changes, the inclusion of a NGS’s logo on the utility-consolidated bill. After reviewing the informal comments provided by stakeholders, the Commission proposed in its Tentative Order the placement of the NGS logo on the NGDC bill. The Commission expressed its position that the inclusion of the logo would make the NGS’s information more noticeable, increase customer awareness of their selected NGS, and strengthen the relationship between the customer and their selected NGS. In the Tentative Order, the Commission allowed for the NGS logo to be either in black and white or in color. Furthermore, the Commission proposed that the NGDCs be allowed flexibility regarding logo placement with the understanding that NGDCs would place the logos as near to the NGS charges as possible to reinforce the connection between the supply charges and the supplier.

**a. Comments**

Consistent with the informal comments previously received by the Commission, stakeholders’ comments to the Commission’s Tentative Order did not indicate any major technical obstacles to placing a NGS logo on the NGDC bill. Parties submitting comments overwhelmingly were supportive of the NGS logo on the NGDC bill. Columbia Comments at 2; EAP Comments at 2-3; PEMC Comments at 2; Peoples Comments at 2-3; RESA Comments at 2; UGI Comments at 1-2.

As described in the Tentative Order, PECO, in successfully implementing a new *Choice Friendly Bill*[[11]](#footnote-12) for both electric and natural gas customers, already has the ability to include supplier logos on its bills, while PGW states its intention to include NGS logos on consolidated bills as part of a new Purchase of Receivables/Consolidated Billing (POR/CB) initiative. PECO Comments at 1-2; PGW Comments at 2. Columbia notes that it has offered NGSs the option of including their logo on Choice bills since the late 1990s. Columbia Comments at 2.

Conversely, and similar to concerns raised during the Electric RMI, a few stakeholders commented on placement of the NGS logo on the consolidated bill and costs incurred by including a NGS logo. Both PGW and EAP advocate for NGDC discretion on the logo’s placement and color. PGW Comments at 2-3; EAP Comments at 2. EAP further advocates for the logo being placed next to the specific supply charges as they appear on the bill. EAP Comments at 2. Meanwhile, RESA supports reasonable NGDC discretion regarding location, and requests that OCMO reviews and approves logo placement and coloring. RESA Comments at 2. Additionally, OCA questions the cost-effectiveness of this modification, and submits that a more thorough cost-benefit analysis should be conducted prior to this modification being adopted. OCA also asserts that this modification should be paid for by the NGSs. OCA Comments at 4.

**b. Disposition**

Based on the feedback received, the Commission maintains its position that the NGS logo should be provided on the NGDC bill. Placing the NGS logo on the NGDC bill reinforces the relationship between the *existing* customer and the selected NGS. Including the NGS logo on the bill also serves as a reminder of the relationship for those customers who may have forgotten about their selected NGS. We would like to reaffirm that it will be voluntary for a NGS to include its logo on customer bills.

While the Commission agrees that logo placement, estimated costs and the associated recovery are concerns, the benefits of having an NGS logo on the NGDC bill are well worth the costs. We also find that the benefits of the logo’s inclusion, especially in reinforcing the relationship between the customer and the supplier, outweigh the estimated costs of implementation and ongoing maintenance. Additionally, we agree with several commenters that the NGDCs be afforded the flexibility regarding the placement of NGS logos. However, we agree with EAP and strongly suggest that the NGDCs place the logos as near to the NGS charges as possible to reinforce the connection between the supply charges and the supplier. Consistent with the Tentative Order, and as requested by RESA, we direct that the NGDCs provide to OCMO, for its review and approval, a draft of the new bills, at which time OCMO can determine if the placement of the logos meets the intent of this initiative (*i.e.,* reinforcing the connection between the supplier and its charges).

 **2. Expansion of NGS Bill Messaging Spacing**

 In our Gas RMI Final Order, this Commission directed OCMO to evaluate expanding the space on the NGDC bill currently afforded to NGSs for bill messaging. After a review of the informal comments provided by stakeholders, the Commission recommended an expansion of bill messaging space for NGSs. We proposed a similar directive as was provided regarding EDC bills – allowing four (4) lines on each NGDC’s bill for NGS messaging. However, we recognized that there may be differences between electric and natural gas bills and, therefore, requested that stakeholders, especially the NGDCs, provide more information on the existing amount of NGS bill messaging space provided on NGDC bills and feedback on the feasibility and appropriateness of providing four lines of messaging space. If four lines of space are not feasible and/or appropriate, we requested that parties provide information as to why this would not be feasible and/or the appropriate amount of NGS messaging space.

 We clarified that the increased messaging space would be made available for use by NGSs, but we did not propose a requirement that NGSs include text in this spacing on every bill. Additionally, we proposed that the content of the text included in the spacing be at the discretion of the NGS and not the associated NGDC. As in our Joint EDC-EGS Bill Final Order, we encouraged NGSs to use such messaging space to provide contract expiration information, such as the expiration date, to customers. We requested feedback from stakeholders on the amount of messaging space necessary to include such information.

**a. Comments**

 EAP notes that the proposed expansion of bill messaging space does not account for variances among companies’ current bill capacity, nor does it consider the utilities’ efforts to reduce bills to one page in length. EAP recommends flexibility in developing any expanded messaging space and believes that stakeholder collaboration is the best method to implement this recommendation. EAP Comments at 3. Similarly, while UGI says that it could provide messaging space that allows for a maximum of 1100 characters, less those needed for necessary NGDC messaging, UGI recommends collaboration between NGDCs and NGSs to avoid increasing the length of customer bills during the implementation of such a change. UGI Comments at 3.

 Columbia does not currently provide NGS bill messaging space, but does state that it is amenable to offering such spacing so long as it is text only, at the customer account level. Columbia also submits that monitoring the messaging should not be its responsibility. Columbia also notes that the inclusion of NGS messaging space, as well as the proposed Shopping Information Box, may increase the bill length and, subsequently, postage costs. Columbia disagrees with such increases. Additionally, Columbia notes that the spacing would follow the “Detail of Charges” section of the bill, which currently includes the NGS’s supply charges, and would appear directly below the NGS logo and contact information. Columbia Comments at 2-3.

 Peoples states that its current bill format does not permit room for additional information and that the expansion of any messaging space would necessitate an additional page. Peoples proposes that, if NGS bill messaging is included, it would develop a secure Supplier Portal to manage NGS bill messaging submittals and that further programming would be needed to allow for individual, customer-specific messages, such as contract expiration dates. Additionally, any messaging would be in black and white text and would reflect one NGS at a time. Peoples Comments at 3-4.

 *PECO’s Choice Friendly Bill* already provides four lines of NGS messaging space; therefore, PECO believes the Commission’s proposal to be feasible and an appropriate means to enhance supplier recognition. PECO Comments at 3. Similarly, PGW states that, as part of its POR/CB initiative, it will be providing up to four lines, of 100 characters each, for NGS bill messaging. PGW recommends that the Commission require NGSs to populate such spacing every month in order to reinforce, encourage, promote and support their relationships with their customers. Additionally, PGW agrees with the Commission that the content of such messaging should be the responsibility of the NGS and not the NGDC. PGW recommends that NGDCs be fully protected from any liability concerning improper use of the messaging space. PGW Comments at 2-3.

 OCA believes more cost-benefit information is necessary before requiring such a billing change. Additionally, OCA supports the Commission’s intent not to expand the number of bill pages and that any increased spacing be utilized to convey contract expiration dates. Lastly, OCA submits that the NGS messaging not detract from, nor be inconsistent with, NGDC messaging and mandated disclosures. OCA Comments at 4-5.

 RESA and PEMC support the Commission’s proposal to provide NGSs with up to four lines of messaging space on the NGDC bill and that such content be at the discretion of the NGS. RESA Comments at 2-3; PEMC Comments at 2. RESA also supports a collaborative between the NGDCs and NGSs on the issue of ensuring that the messaging space be formatted within the framework of the existing NGDC bill template. RESA Comments at 2-3.

 **b. Disposition**

 This Commission maintains its opinion, as expressed in both the Tentative Order and the similar initiative on the electric side, that supplier bill messaging space allows competitive suppliers to provide their customers with valuable information regarding their chosen generation product and supplier. This information reinforces the relationship between the supplier and the customer.

 We recognize the concerns expressed by some in the NGDC community and OCA regarding potential increases in the number of bill pages resulting from the directives herein. However, collectively the NGDCs did not provide enough evidence that any increase in bill messaging space will lead to additional pages, and did not provide viable alternatives regarding an appropriate amount of bill messaging space that would allow NGS messaging while maintaining single-page bills. Therefore, in an effort to increase customer education regarding the competitive natural gas marketplace and reinforce supplier-customer relationships, this Commission directs NGDCs to work with NGSs, and where necessary, OCMO, to implement any necessary changes to provide four lines of NGS messaging space on the NGDC bill. We believe reasonable attempts should be made to ensure that the additional bill messaging space can be formatted within the framework of existing NGDC bill templates. *See* PECO *Choice Friendly Bill* (Attachment to this Order).

 We strongly encourage NGSs to maximize their use of this messaging space often and to provide contract expiration dates, where feasible and appropriate, to inform and remind customers of upcoming generation supply changes.

 **3. Inclusion of a Shopping Information Box**

Through review of stakeholders’ informal comments, and consistent with our direction in the Electric RMI, the Commission proposed in its Tentative Order the creation of a conspicuous “Shopping Information Box” that can be developed and placed on the NGDC bill. As we advocated with electric consolidated billing, the Commission wants important natural gas shopping information to be easily accessible to the customer, and not embedded among a laundry list of other charges on the NGDC bill. Furthermore, we also agreed with several commenters that the Shopping Information Box should be limited to basic shopping information needed to allow a customer to more readily shop.

 Accordingly, we suggested the following in utility-consolidated bills: a “Shopping Information Box” that includes a customer’s account/customer number (whichever is needed to effectuate a switch to an NGS), a customer’s Rate Schedule and an indication that this information is needed when shopping with an NGS. Additionally, following a review of the Shopping Information Box initiative on the electric side, we maintain our position that the inclusion of language regarding contract expiration is beneficial to increase customer awareness of potential supply contract expiration dates. Therefore, we proposed that the Shopping Information Box also include a statement reminding customers to know their contract expiration date. We expressed our opinion that the Shopping Information Box could be easily incorporated by the NGDCs at a one-time cost because, in most cases, once set, the information in this box will not change. An example of this box is presented below:

|  |
| --- |
| **Shopping Information Box** |
| When shopping for gas with a Natural Gas Supplier, please provide the following:  Account number/customer supplier ID number:  Rate Schedule:If you are already shopping, know your contract expiration date. |

 The Commission noted that the example above was not the only wording that would be acceptable to the Commission, but did propose a number of inherent characteristics the box must have:

* It must be conspicuous;
* It must be placed on the bill separate and apart from other charges; and,
* It must include necessary information to assist customers when shopping (account or customer number, rate schedule and explanation of the “Shopping Information Box”).

In light of this recommendation, the Commission requested comments on the suggested placement and presentation of the Shopping Information Box, specifically including comments regarding the presentation of information for customers with multiple customer/account numbers. As discussed below, while we proposed some flexibility in the Shopping Information Box language, we also proposed that the NGDCs provide to OCMO, for its review and approval, a draft of their new bills, at which time OCMO could determine whether or not the language and placement of the Shopping Information Box meets the intent of this initiative (*i.e.,* to provide customers with the basic information necessary in order to participate in the competitive natural gas market).

1. **Comments**

Consistent with the Electric RMI, stakeholders generally support including a Shopping Information Box on the NGDC bill, while giving the NGDCs discretion over box placement on the bill. Among the NGDCs and industry groups, EAP, PEMC and RESA expressed support for the Shopping Information Box on the NGDC bill. EAP Comments at 4; PEMC Comments at 1; RESA Comments at 3. PECO already includes a Shopping Information Box on its bills by virtue of its new *Choice Friendly Bill* for both electric and natural gas customers, while PGW states its intention to include a Shopping Information Box on consolidated bills as part of its POR/CB initiative. PECO Comments at 3-4; PGW Comments at 3. UGI states that it will be able to include shopping boxes on the bills of NGS customers by June 2016. UGI Comments at 3.

Columbia is also supportive of the initiative; however, it believes that the Shopping Information Box should also include the NGDC’s Price to Compare (PTC) and should be limited to only Choice-eligible customers. Columbia Comments at 3. Peoples is the only NGDC that does not support the Commission’s recommended Shopping Information Box, largely due to the potential of an additional bill page and additional costs incurred to include the box on its current bill. Peoples also believes that it already provides the necessary information for customers to shop, and requiring placement of the Shopping Information Box on Peoples’ bills is unnecessary. Peoples Comments at 5-6.

Additionally, OCA does not support the Shopping Information Box as proposed in the Tentative Order. While the OCA agrees that a properly designed shopping box could assist customers interested in shopping, the OCA is concerned that the shopping box, as proposed, takes away from the prominence and importance of the PTC without providing additional benefit to the customer and, therefore, the benefits to customers would be outweighed by the costs. OCA Comments at 6.

**b. Disposition**

Upon review of the comments and noting that most stakeholders, including a majority of the NGDCs, are supportive of the inclusion, the Commission directs that, within one year of the entry date of this Final Order, NGDCs must include on their bills, separate and apart from other charges, a Shopping Information Box that includes a customer’s account/customer supplier ID number (whichever is needed to effectuate a switch), the customer’s Rate Schedule and an indication that this information is needed when shopping with an NGS. While appreciative of the ongoing consumer education efforts of Peoples and the other NGDCs, we reject the notion that the Shopping Information Box is unnecessary and instead view it as a valuable stand-alone tool in assisting shopping customers. The Shopping Information Box should include language reminding a customer who has already shopped to be aware of whether or not their current generation supply contract has an expiration date and, if so, when the expiration occurs.

 We agree with the comments from EAP and others that indicate that the Commission should remain flexible regarding the size and location of this information on the NGDC bill, and, as a result, we will not dictate where this information should be included. However, we do require that the Shopping Information Box be conspicuous and separate and apart from other charges and include the specific language provided below. We also will not dictate the font size or type utilized to present this information. Consistent with the Electric RMI, and as suggested by RESA, NGDCs must supply to OCMO, for its review and approval, and to OCA and OSBA for informative purposes, samples of revised bills before dissemination. Following dissemination of the joint bill, if an NGDC determines that changes to its joint bill are necessary, we will expect the NGDC to again submit a draft of the redesigned bill to OCMO for its review and approval. As a result, the Commission will have an advanced opportunity to review and approve the placement of the Shopping Information Box and alert NGDCs of any concerns prior to the bills being produced in final form. We encourage NGDCs to present the Shopping Information Box in a prominent place on the bill and in the same location every month.

 Finally, while we appreciate the suggestions from the OCA and Columbia that additional information, namely the current PTC, can or should be included in the Shopping Information Box, we decline to adopt these suggestions at this time. Part of the intent of the Box’s design was to have information included that would not significantly lengthen the bill, would not significantly complicate the bill, and would not have to be continuously updated. The Shopping Box is meant to include information that would only rarely require updating (*e.g.,* new customer account/customer number). The regular updating of the PTC is not consistent with this intent. Additionally, the PTC is already found elsewhere on the bill and information related to a customer’s specific contract expiration date can be included, if an NGS chooses to do so, in the NGS messaging space that will be increased as a result of this Final Order. However, we do believe it should be reinforced that an existing NGS customer who is shopping should be aware of whether his or her current supply contract has an expiration date and, if so, when that expiration occurs. Therefore, the Shopping Information Box must include language reminding such customers to know that information when shopping. An example of the Shopping Information Box is provided below.

|  |
| --- |
| **Shopping Information Box** |
| When shopping for gas with an Natural Gas Supplier, please provide the following:  Account number/customer supplier ID number:  Rate Schedule:If you are already shopping, know your contract expiration date. |

**B. Inclusion of NGS Inserts**

In our Gas RMI Final Order, the Commission recommended that OCMO review, among other things, the inclusion of NGS billing inserts. This insert could be a letter, a notice or marketing material provided by the customer’s current NGS.

While the Commission recognizes that NGS inserts may provide a customer with more information regarding the product he or she is currently receiving, or regarding other options that may be available, we are concerned with the potential for increased costs and complexities attendant to NGS inserts. Additionally, because an insert would need to be provided at some point in time before the bill is mailed, it is possible that some of the inserts may be outdated by the time they are received by customers. In its Tentative Order, the Commission requested stakeholders’ comments regarding the practical inclusion of NGS inserts and how the benefits of inserts would outweigh the costs and complexities.

Additionally, the Commission cited Sections 62.141 and 62.142 of our regulations that establish standards of conduct regarding the retail supply of natural gas. 52 Pa. Code §§ 62.141-62.142. Section 62.142(16) requires legible disclaimers when an affiliated NGS communicates to the public using an NGDC name or logo. Section 62.142(17) restricts an NGDC from joint marketing with an affiliated NGS, including the use of bill inserts, unless the NGDC offers or provides these services to nonaffiliated NGSs on the same terms and conditions. 52 Pa. Code § 62.142(17)(ii). Therefore, we also requested specific comments on the applicability of, or any necessary revisions to, Sections 62.141-62.142 of our regulations.

1. **Comments**

Similar to comments received by the Commission during the electric RMI, several stakeholders submitted comments reinforcing concerns regarding the cost of NGS bill inserts, as well as its feasibility with current billing systems and mailing methodologies. Columbia Comments at 4-5; EAP Comments at 5-6; OCA Comments at 6-7; PECO Comments at 4-5; Peoples Comments at 6-7; PGW Comments at 4; UGI Comments at 4. These stakeholders overwhelmingly oppose the inclusion of NGS bill inserts at this time. EAP strongly opposes any further exploration of NGS bill inserts. EAP Comments at 5.

PGW believes that the ongoing mailing of NGS marketing materials and any associated costs are the sole responsibility of NGSs. PGW Comments at 4. OCA expresses its concern that the inclusion of NGS billing inserts may give the appearance that an NGDC endorses a particular NGS, or may otherwise lead customers to believe that they are obligated to shop, either with that NGS, or in general. OCA Comments at 7.

Two stakeholders, PEMC and RESA, encourage the Commission to continue exploring the potential benefits to consumers by permitting NGS bill inserts. PEMC Comments at 3; RESA Comments at 4. RESA, which previously supported the Commission’s tentative decision to further study the issue of bill inserts before taking any specific regulatory action, advocates getting the NGDCs’ informed views of what the prerequisites would be (cost, timing, procedures, etc.) to make this form of customer communication available to NGSs. RESA Comments at 4.

Regarding revisions to the current regulations, 52 Pa. Code §§ 62.141-62.142, OCA recommends removing the qualifying language “through radio or television” in Section 62.142(16) so that the provision applies equally to any verbal communication with the public. Additionally, and specifically to Section 62.142(17), the OCA submits that the Commission should make no revisions or changes to Section 62.142(17). OCA Comments at 7-8.

**b. Disposition**

This Commission feels that the majority of stakeholders reinforce our earlier concerns with NGS bill inserts, and therefore maintains its position not to direct NGS bill inserts with NGDC bills at this time. While we understand the desire of NGSs to strengthen their relationships with customers and to provide various messaging in conjunction with the bills, we are not persuaded that these benefits outweigh the potentially significant costs and difficulties associated with implementing this proposal. We agree with EAP that further exploration of NGS bill inserts is not needed, and decline the request of PEMC and RESA to further study the issue of bill inserts at this time.

 Additionally, we believe the increased NGS messaging space, as outlined previously, provides NGSs with the opportunity to provide more messages directly to customers on the *actual* bill. We continue to encourage NGSs to communicate directly with their customers, via call centers, telephonic messaging, mail and/or electronic mail contact mechanisms, as appropriate, regarding potential offers, issues, changes, etc. that they feel are important. While this proceeding is focused to develop a more supplier-oriented utility-consolidated bill, the Commission encourages NGSs to do their own outreach to customers to develop stronger relationships.

**C. Inclusion of Value-Added Services**

This Commission did not propose a requirement that NGDCs include additional line items for NGS value-added services charges. Specifically, we expressed concerns regarding the application of customer bill payments and the effect of non-payment for such value-added services. We encouraged the NGS community to provide as much diversity in product and service offerings as possible to ensure a competitive and beneficial retail natural gas market; however, we stated that, at this time, NGDCs should not be made responsible for the collection of charges for NGS value-added services.

 **1. Comments**

 PECO, Columbia, PGW and OCA agree with the Commission’s concerns and support the exclusion of NGS value-added services as line item charges on bills. PECO Comments at 5; Columbia Comments at 6; PGW Comments at 4; OCA Comments at 8. Columbia notes that natural gas supply charges that are bundled with other products and services may make it more difficult for customers to evaluate and compare supplier offers, as well as lead to customer confusion. Columbia believes the inclusion of such services is contrary to existing POR programs. Columbia notes that NGSs have the option to send separate invoices for value-added services. Columbia Comments at 6.

 **2. Disposition**

 The Commission received no comments disagreeing with its determination that line items for NGS value-added services be excluded from joint NGDC-NGS bills. Additionally, we agree with Columbia that the inclusion of such services may potentially conflict, or at least be difficult to implement, with existing POR programs. Therefore, we will not require NGDCs to amend bill template to include line item charges for NGS value-added services.

**D. Dual and Summary Bills**

 An issue was raised within the informal comments regarding the inclusion of any proposed joint bill initiatives in dual bills. Dual bills are separate bills, one provided by the NGDC for distribution-related costs and one provided by the NGS for supply-related costs. A question was raised regarding the applicability of joint bill initiatives in such scenarios. We did not propose the inclusion of the NGS logo or extended bill messaging space on the utility bill in these occurrences. However, we recognized the value in including the Shopping Information Box on the utility bill and requested comments on this issue.

 Additionally, we realized that, on the electric side, summary bills may be provided to customers. A summary bill generally is sent to one primary account contact and includes the charges for multiple accounts under that person/organization. For example, a university may receive a summary bill for all of its accounts. We requested comments as to the provision of such bills on the natural gas side and the frequency with which it occurs. Additionally, we requested feedback regarding the appropriateness of including any, or all, of the proposals on this kind of bill.

 Lastly, in addition to the dual and summary bill scenarios outlined above, we requested that stakeholders provide feedback regarding any other potential billing scenarios that may prove problematic. Specifically, we asked stakeholders to consider whether there are certain customer classes, rate classes, etc. wherein the provision of the NGS logo, expanded bill messaging space or Shopping Information Box may prove to be difficult or unfeasible.

 We reiterated that we will not, at this time, be reviewing the possibility of supplier-consolidated billing in the retail natural gas marketplace.[[12]](#footnote-13)

 **1. Comments**

 EAP believes it inappropriate to include the Shopping Information Box on summary bills. EAP notes that entities receiving summary bills are already aware of and have a relationship with their supplier as they receive a separate bill from the NGS for supply-related charges. Therefore, such a customer would fail to receive value from the Shopping Information Box. EAP Comments at 4.

 UGI notes that it does not present consolidated bills, instead issuing separate bills for each account number, and therefore, would include a Shopping Information Box on each bill. UGI Comments at 3.

 PECO currently includes the Shopping Information Box on its dual bills and agrees with the Commission regarding its value to customers. However, PECO believes the inclusion of the Shopping Information Box, as well as logos or messaging space, may be more difficult on summary bills. PECO notes that such bills are designed to facilitate and manage the payment of multiple accounts and, therefore, only provide the basic information needed for customer to know the entire amount due for the all of the individual account charges summed together. PECO avers that including a supplier logo, bill messaging space and Shopping Information Box for each account is not feasible due to spacing constraints and shipping costs. PECO notes that, if such customers wish to have this information included on their bills, they can sign up to view *Choice Friendly Bills* for each individual account. Accordingly, PECO recommends that the Commission exclude supplier-oriented elements from summary bills. PECO Comments at 5-6.

 Columbia supports including the NGS logo and messaging space only on non-Customer Assistance Program (CAP), Choice customer bills and the Shopping Information Box on all non-CAP residential and small commercial customer bills. The inclusion of such information is unnecessary on large commercial and industrial transportation customer bills as it is a mature market and, on Columbia’s system, is dual-billed. Columbia Comments at 7.

 PGW does not believe it necessary to include the Shopping Information Box on summary bills as such bills are provided to large governmental, commercial and industrial customers, which all have a long-standing history of shopping for competitive suppliers. PGW Comments at 5.

 RESA believes that the Shopping Information Box should be included on dual bills, with the NGS logo, messaging space and Shopping Information Box included on summary bills. RESA avers that such information aids customers in participating in the competitive market. RESA Comments at 4-5.

 **2. Disposition**

 We agree with PECO and RESA that the Shopping Information Box is appropriate for inclusion on dual bills as it provides a customer with information should they wish to switch from their existing supplier. We also agree that the NGS messaging space and logo are not relevant on such bills as the customer is already receiving a separate bill from the supplier, effectively reinforcing the relationship.

 We also agree with the NGDCs that it may be difficult and unnecessary to include the NGS logo, messaging space and Shopping Information Box on certain types of bills, including summary bills. Therefore, those instances involving a summary bill format for large commercial or industrial customers would not lend itself to the inclusion of one or more of the elements outlined herein. Accordingly, we will not require the NGDCs to amend those specific bill formats to include that element(s).

**E. Costs and Timeline**

 **1. Costs and Cost Recovery**

 We requested that NGDCs and other interested parties provide cost estimates for the changes required in order to implement the three proposals outlined in our Tentative Order. Additionally, should a party provide other recommendations for making the bill more supplier-oriented, the Commission asked that cost estimates be included in those comments.

 The Commission recognized that the changes recommended in its Tentative Order may necessitate billing system, electronic data interchange (EDI) and/or information technology changes. As we believed our proposals would affect all customers, the Commission proposed that the costs associated with its recommendations be recovered from all distribution customers on a non-bypassable basis through a surcharge or some similar mechanism. If parties believed other cost recovery mechanisms are more appropriate, we asked that those mechanisms be addressed in comments.

 **a. Comments**

 EAP requests flexibility in the NGDCs’ choice of recovery mechanism and believes that NGSs should share, at least in part, some of the costs, as NGSs will receive marketing benefits from the implementation of the recommendations. EAP Comments at 4.

 UGI supports the use of a non-bypassable surcharge. If the Commission requires the inclusion of bill inserts, UGI proposes that the NGSs be required to pay the costs of implementing and distributing such inserts. UGI Comments at 6.

 PECO estimates that the costs for including the supplier-oriented elements proposed in the Commission’s Tentative Order will be approximately $100,000. PECO believes it should be permitted to recover all reasonable costs incurred to implement the *Choice Friendly Bill* for natural gas customers pursuant to existing tariff riders/surcharges or new tariff riders/surcharges, as applicable, from all customers. PECO Comments at 6-7.

 Columbia notes that it already allows NGSs the option of including their logos, in black and white, on Choice bills. Therefore, it estimates the costs of including the Shopping Information Box and NGS bill messaging space to be approximately $244,720. Columbia proposes recovering the Shopping Information Box costs through its existing Rider Customer Choice. It also proposes recovering the costs of the bill messaging space from the Choice NGSs. With regard to NGS logos, Columbia currently charges an NGS a one-time setup fee of $400.00. Columbia notes that, historically, its IT costs associated with such a setup average $4,000.00 and believes that an NGS should bear the responsibility of all costs associated with the provision of its logo on the bill. Columbia Comments at 8-9.

 Peoples estimates it with costs approximately $345,000 to design and implement the Commission’s proposals, with ongoing annual maintenance costs of $11,000. Peoples supports the Commission’s cost recovery proposal but also notes the option of a cost-sharing mechanism whereby the NGSs pay some of the costs. Peoples Comments at 7.

 PGW notes that recovery of the costs associated with its POR/CB initiative (which includes much of what the Commission proposed in its Tentative Order) has already been determined. However, if additional costs are incurred, PGW believes they should be recovered through a discount on receivables purchased from NGSs. If the Commission disagrees, PGW avers that cost recovery should be allowed through a reconcilable customer surcharge allowing for full and timely cost recovery. PGW Comments at 5.

 OCA believes a cost-benefit analysis should be performed. OCA argues that the costs of the joint bill should be borne by the NGS since the costs are a direct function of the NGSs’ use of the NGDC bill to collect their charges. OCA Comments at 8-9.

 RESA and PEMC support the use of a non-bypassable surcharge. RESA Comments at 5; PEMC Comments at 3. RESA notes that the use of a regulatory asset, upon NGDC request, for future cost recovery claims would also be appropriate. RESA Comments at 5.

 **b. Disposition**

 We disagree with OCA that a full-fledged cost-benefit analysis is necessary to determine the benefits of these directives. The main purpose of this Investigation is to find ways to provide for a beneficial and robust natural gas market. This includes providing customers with the information necessary to comfortably participate in the market and, subsequently, enhancing and reinforcing those customers’ relationships with their chosen competitive suppliers. We believe the inclusion of the supplier’s logo, associated messaging from that supplier on the bill and the Shopping Information Box are clearly beneficial and relatively easy steps to achieving such goals. Additionally, we believe that it would be difficult, if not impossible, to quantify (1) the benefits of customers better understanding the role of the NGS; (2) the benefits of increased customer awareness of a change in supplier and, subsequently, reducing the potential for slamming;[[13]](#footnote-14) and (3) the benefits and potential savings realized by customers when utilizing the information contained in the Shopping Information Box when participating in the competitive natural gas marketplace. Lastly, we believe the costs of these changes would be less than those incurred in implementing supplier-consolidated billing. Therefore, we do not believe it necessary to perform a full-fledged cost-benefit analysis, as requested by OCA.

 We also believe that the NGDCs should be provided with the recovery of reasonably and prudently incurred costs associated with the design and implementation of including suppliers logos, providing for bill messaging space and including the Shopping Information Box, as outlined herein. The Commission maintains that the use of a non-bypassable surcharge is most appropriate in recovering the costs of including NGS logos, expanding bill messaging space and incorporating a Shopping Information Box. This includes the use of a non-bypassable surcharge for the recovery of PECO’s already-implemented *Choice Friendly Bill* for its natural gas customers. We disagree with the arguments that these initiatives act as marketing avenues for suppliers. As noted in our Joint EDC-EGS Bill Final Order with regard to the inclusion of EGS logos, this argument is flawed in that the supplier’s logo and any messaging provided in the additional spacing on the bill are from a supplier that the customer has *already* chosen.[[14]](#footnote-15) The logos and bill messaging initiatives outlined herein will not, and should not be designed to allow for NGSs to randomly place logos or messages on a bill for a customer with whom it has not entered into a contract. Additionally, as previously discussed, we believe the three directives outlined herein, while benefitting suppliers to some extent (*e.g.,* including logos and providing for bill messaging), ultimately are most beneficial to customers. The logo and bill messaging reinforce the message to customers that they have chosen a specific supplier for their generation supply. The Shopping Information Box provides, in one convenient and easy-to-find location, the information the customer needs in order to choose a competitive supplier. This information may also be helpful to a customer when contacting NGDC call centers with questions. As we believe this information helps all natural gas customers, whether shopping or non-shopping, we will allow for the use of a non-bypassable surcharge for the NGDC recovery of its costs associated with incorporating NGS logos on bills, providing for NGS bill messaging space and including a Shopping Information Box.

 **2. Timeline**

 The Commission proposed that the three recommendations outlined in the Tentative Order be implemented no later than June 1, 2016.

 **a. Comments**

 EAP requests that NGDCs be given an equal amount of time to implement the proposed changes as that which was provided to the EDCs with regard to the joint EDC-EGS bill, which equated to approximately 12 months. EAP Comments at 5. EAP, Columbia and Peoples request an implementation date of one year from the issuance of a final order at this docket. EAP Comments at 5; Columbia Comments at 9; Peoples Comments at 8. EAP also notes that the NGDCs are required to implement account number access mechanisms by August 31, 2016, which may affect the operations and information technology (IT) resources needed to also implement the joint bill changes and requests Commission guidance on how to prioritize these initiatives. EAP Comments at 5.

 PGW notes that it anticipates incorporating NGS logos, supplier messaging space and a Shopping Information Box coincidental with the launch of its POR/CB in fall 2015. PGW Comments at 6.

 OCA believes the initiatives should only be implemented after proving to be cost-justified. OCA Comments at 9-10.

 RESA believes June 1, 2016, to be a reasonable deadline and believes the Commission should encourage NGDCs to implement the proposals as quickly as possible. RESA Comments at 5-6.

 **b. Disposition**

 The Commission recognizes the arguments provided by the utility community that one year from the issuance of this Final Order would be an appropriate deadline for implementing the joint bill initiatives outlined herein. We will allow the NGDCs a deadline of no later than one year from the entry date of this Final Order to implement the joint bill. However, we agree with RESA that the NGDCs should make all reasonable effort to implement the changes before the deadline. The NGS logo, messaging space and the Shopping Information Box will provide customers with valuable information that we believe should be provided as soon as reasonably possible.

**F. Existing NGDC Joint Bill Initiatives**

 In its informal comments, PECO noted that it implemented, in December 2014, the electric joint bill initiatives (*Choice Friendly Bill*) and also included those changes in the bills for its natural gas customers. PECO Informal Comments at 1-2. PECO requested that it be allowed to maintain these enhancements in its existing *Choice Friendly Bill*. *Id.* at 2.

 Similarly, PGW stated that, pursuant to its Commission-approved settlement, it is in the process of implementing many of the electric joint bill initiatives for its gas customers as part of its POR/CB program. PGW Informal Comments at 1. Specifically, PGW noted that it is incorporating joint bill aspects that are either explicitly addressed in the Gas RMI Final Order that serve similar purposes, including: 1) black and white supplier logos; 2) a new supplier message section meeting the electric joint bill specifications; 3) a new Shopping Information Box based on the electric joint bill specifications; and, 4) a comprehensive Choice marketing campaign including two rounds of direct mailers to all POR eligible customers and, if desired by NGSs, a supplier insert. *Id.* at 2-3.

 In our Tentative Order, we supported the initiatives undertaken by both PECO and PGW and requested that both companies provide comments regarding any potential changes to their current initiatives that would be required in order to comply with the proposals contained herein. We did not suggest making changes to PGW’s billing initiatives that were approved via a joint settlement. Nor did we express a wish to make wholesale changes to PECO’s *Choice Friendly Bill* that is already being provided. However, we did want to confirm that the information included in our proposals would be provided in PECO and PGW’s existing initiatives. Therefore, we specifically requested feedback from PECO and PGW regarding the applicability of the proposals included in our Tentative Order in relation to their existing joint bill initiatives.

 **1. Comments**

 PECO does not believe that the Commission’s proposals would require changes to its existing Choice Friendly Bill. PECO Comments at 7.

 As discussed in the specific NGS logo, NGS bill messaging space and Shopping Information Box sections of this Final Order, PGW’s POR/CB initiative appears to provide for the three directives contained herein.

 **2. Disposition**

 We reiterate that we do not wish to make changes to the existing joint bill efforts of both PECO and PGW. Based on the comments provided by both NGDCs, it appears that their existing efforts conform to the directives provided in this Final Order. Additionally, while we provided for a non-bypassable surcharge cost recovery mechanism and an implementation deadline of one year from the entrance of this Final Order, we do not wish to change any Commission-approved cost recovery mechanism or implementation deadlines already provided to PGW. PECO’s *Choice Friendly Bill* appears to be in accordance with the directives contained herein; however, we expect PECO to contact OCMO immediately if this is not the case, in order to work out the appropriate timeframe for PECO to come into compliance with this Final Order.

**G. Provision of Draft and Sample Bills**

 This Commission proposed that all jurisdictional NGDCs provide to OCMO, for its review and feedback, a draft of their revised bills, at least 45 days in advance of the active dissemination of the new bills. While OCMO has already reviewed PECO’s joint bill developed as a result of the Joint EDC-EGS Bill Final Order, if any of the initiatives outlined in our Tentative Order would result in changes to that bill, we proposed that PECO be required to provide a new draft bill to OCMO for its review and feedback. With regard to PGW, while we recognized that PGW’s billing changes have resulted from a joint settlement, we still believe it beneficial to require OCMO’s review before the new billing format is implemented.

 Lastly, we proposed that, following OCMO’s review of the draft bills, new sample bills be provided to the Commission’s Office of Communications for inclusion on the Commission’s website. Also, we proposed that new sample bills be provided to the OCA and the Office of Small Business Advocate (OSBA).

 **1. Comments**

 Columbia states that it will provide OCMO, 45 days prior to the planned distribution, with drafts of its revised Choice-eligible and Choice bills that comply with a Final Order in this proceeding. Columbia will also provide final copies of sample bills to OCA, OSBA and the Commission’s Office of Communications. Columbia Comments at 9-10.

 OCA supports the Commission’s proposal to have OCMO review the draft bills at least 45 days in advance of their dissemination to customers. OCA requests that statutory advocates be provided the opportunity to review and provide feedback on the drafts, as well. OCA Comments at 10.

 **2. Disposition**

 The NGDCs are free to provide to OCA and OSBA drafts of the joint bills for review. However, we will not require the NGDCs to submit drafts of the joint bills to the statutory advocates for their prior review. The NGDCs must provide to OCMO drafts of the bills at least 45 days in advance of their dissemination. If an NGDC chooses to allow for statutory advocate review of the drafts, this should be done before providing a final draft of the bills to OCMO, as OCMO should be the final level of review before dissemination of the newly formatted bills to customers. However, we do not intend to create a forum for adversarial proceedings to adjudicate a joint bill proposal. Additionally, the NGDCs should provide to the Commission’s Office of Communications, as well as OCA and OSBA, new sample bills based on the OCMO-approved joint-bill formatting.

**H. PCL&P’s Request for Exemption**

 The Commission proposed that all jurisdictional NGDCs provide the joint NGDC-NGS bill containing the NGS logo, expanded bill messaging space and Shopping Information Box.

 **1. Comments**

 PCL&P notes that, although it has implemented the joint EDC-EGS bill, it believes such recommendations should not be applied to its gas bills. PCL&P states that no NGSs currently serve in its territory and, therefore, the changes would result in customers incurring implementation costs for something that may lead to customer confusion and frustration. PCL&P states that, in the event NGS options become available in its service territory, it would implement the Commission’s joint NGDC-NGS bill recommendations within six months of an NGS approval to service in its territory. PCL&P Comments at 1.

 **2. Disposition**

 We agree with PCL&P that including a Shopping Information Box on a customer’s bill in a service in which there are no active suppliers may be confusing. With the lack of active suppliers, the NGS logo and bill messaging space is also unnecessary; however, these elements would not appear on a customer’s bill so our immediate concern is the Shopping Information Box. We agree that PCL&P should not implement these changes, at this time, due to a lack of active NGS participation in its service territory. However, PCL&P should implement the three joint bill changes outlined in this Final Order if and when an active NGS begins operations in its service territory. At that time, PCL&P will be required to file a notice with the Commission advising that the bill changes directed in this Final Order are being implemented, the estimated costs and the anticipated completion date.  The notice should be filed with the Secretary at this Docket Number along with an email copy to OCMO at ra-ocmo@pa.gov.

 Other smaller NDCSs without active suppliers in their territories may also seek exemption or delay in implementation of this Joint Bill requirement.

# I. Standards of Conduct

 **1. Comments**

 UGI references in its comments the Commission’s regulations at 52 Pa. Code § 62.142, which provides, among other things, directions regarding the use of an NGDC’s affiliated NGS information within NGDC materials and as part of NGDC marketing. *See* 52 Pa. Code § 62.142 (a)(15) and 52 Pa. Code § 62.142 (a)(17). UGI believes it impractical to include the disclaimers specified in 52 Pa. Code § 62.142(a)(15) (regarding an affiliate not being the same company as an NGDC; that affiliate pricing is not Commission-regulated; and that customers do not have to purchase affiliate products to receive the same quality of service from the NGDC) if the logos of the affiliated NGSs are included on bills. Additionally, UGI believes it would be unfair to such affiliates to effectively preclude them from including their logos or messaging if such access is provided to competing NGSs. UGI suggests that the Commission waive, to the extent applicable, the regulations at 52 Pa. Code § 62.142 (a)(15) for affiliated NGS logos and bill messages and to seek to amend the regulations accordingly.

 UGI also requests clarification that the inclusion of NGS logos and messages on customer bills in a non-discriminatory manner consistent with a Final Order in this proceeding does not constitute joint marketing or the joint packaging of services referenced at 52 Pa. Code § 62.142 (a)(17)(i). *See* 52 Pa. Code § 62.142 (a)(17)(i) (regarding a restriction that NGDCs not jointly market or package its Commission-regulated services with the services of an affiliated NGS). If this is unclear, UGI suggests that the Commission waive the regulations at 52 Pa. Code § 62.142 (a)(17)(i) and to seek to amend the regulations accordingly.

 **2. Disposition**

 The Commission does not believe a waiver or an amendment to its regulations at 52 Pa. Code § 62.142 are necessary at this time. 52 Pa. Code § 62.142 (15) specifically states the following:

(15) When an affiliated NGS markets or communicates to the public using the NGDC name or logo, it shall include a legible disclaimer that states that:

(i) The affiliated NGS is not the same company as the NGDC.

(ii) The prices of the affiliated NGS are not regulated by the Commission.

(iii) A customer does not have to buy natural gas or other products from the affiliated NGS to receive the same quality of service from the NGDC.

 We do not believe the inclusion of an affiliate NGS’s logo or associated bill messaging conflicts with these regulatory provisions. As explained previously in this Final Order with regard to cost recovery, we do not believe these elements to be NGS marketing efforts. The logo and messaging are provided from an NGS to its *existing* customer, not from an NGS marketing to a *potential* customer.

 Additionally, as outlined in the regulations, the required disclaimer would be provided to a customer upon enrollment, not necessarily in every subsequent communication from the affiliate NGS to its then *existing* customer. Therefore, an affiliate NGS’s existing customers receiving the joint NGDC-NGS bill with the affiliate’s logo and bill messaging would already have been provided with the disclaimer outlined at 52 Pa. Code § 62.142 (15). We stress that the intention of the joint bill is to provide uniform treatment toward and opportunities for all suppliers, regardless of any affiliate relationships with utilities.

 UGI also requests clarification regarding the Commission’s regulations at 52 Pa. Code § 62.142 (a)(17)(i). 52 Pa. Code § 62.142 (a)(17)(i) specifically states:

 (17) An NGDC may not:

(i) Jointly market or jointly package its Commission-regulated services with the services of an affiliated NGS.

Again, the Commission does not believe it necessary to waive or amend its regulations. Again, we do not see these joint bill changes as inappropriate marketing efforts attempting to take advantage of the NGDC’s branding and recognition to garner customer interest in the affiliate NGS. With regard to jointly packaging services, we do not believe billing to be such joint packaging. The generation product(s) provided by both affiliate and non-affiliate NGSs are already included, in most cases except for dual bill scenarios, on the NGDCs’ bills. We believe the inclusion of the logo and messaging space simply provides more clarity to those products already outlined on NGDC bills. The information is reinforcing the customer’s relationship with his or her chosen supplier, regardless of affiliation. Again, the purpose of the joint bill is to educate and inform, not to market and promote. Therefore, we do not see a conflict with the directives of this Order and our regulations at 52 Pa. Code §§ 62.141-62.142.

# CONCLUSION

 With this Final Order, the Commission adopts recommendations from OCMO for creating a more supplier-oriented utility-consolidated bill. Specifically, the Commission adopts the following changes: the inclusion of the NGS’s logo on the NGDC bill; the expansion of NGS bill messaging space to four lines; and the inclusion of a Shopping Information Box. We believe these three mechanisms will aid customers in not only developing a stronger recognition of, and relationship with, their NGS, but also will increase customer awareness when participating in the competitive retail natural gas market. We have attached to this Final Order, for stakeholder reference, a sample of PECO’s existing *Choice Friendly Bill* to provide an example of how these three billing changes could be implemented. We encourage other NGDCs to examine and review PECO’s *Choice Friendly Bill* as a model for rendering their own joint bills. The NGDCs are required, as outlined herein, to provide OCMO, for its review and approval, a draft of their new bill templates at least 45 days in advance of dissemination to customers.

**THEREFORE,**

 **IT IS ORDERED:**

 1. That all jurisdictional natural gas distribution companies subject to the Natural Gas Choice and Competition Act, 66 Pa. C.S. § 2202, shall implement these changes, in accordance with this Final Order, no later than one year from the entry date of this Final Order.

 2. That all jurisdictional natural gas distribution companies subject to the Natural Gas Choice and Competition Act, 66 Pa. C.S. § 2202, shall provide a draft of their revised bills, at least 45 days in advance of the active dissemination of the new bills, to the Commission’s Office of Competitive Market Oversight for its review and approval.

 3. That, upon approval from the Commission’s Office of Competitive Market Oversight of the proposed joint bills, natural gas distribution companies must provide to the Commission’s Office of Communications sample bills for the residential, small business and large commercial and industrial customer classes.

 4. That, upon approval from the Commission’s Office of Competitive Market Oversight of the draft bills, natural gas distribution companies must provide to the Office of Consumer Advocate a sample of the bill to be provided to residential customers.

 5. That, upon approval from the Commission’s Office of Competitive Market Oversight of the draft bill, natural gas distribution companies must provide to the Office of Small Business Advocate a sample of the bill to be provided to small business customers.

 6. That this Final Order be served on all jurisdictional Natural Gas Distribution Companies, all licensed Natural Gas Suppliers, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate and the parties who filed comments at Docket No. M-2015-2474802.

 7. That a copy of this Order be posted on the Commission’s website at the Office of Competitive Market Oversight’s Natural Gas Retail Markets Investigation web page - <http://www.puc.pa.gov/utility_industry/natural_gas/natrual_gas_rmi.aspx>.

8. That the Office of Competitive Market Oversight electronically serve a copy of this Final Order on all persons on its contact list for the Natural Gas Retail Markets Investigation.

**BY THE COMMISSION,**

 Rosemary Chiavetta

 Secretary

(SEAL)

ORDER ADOPTED: August 20, 2015

ORDER ENTERED: August 20, 2015

Attachment





1. *Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service* Final Order, at 67, Docket No. I-2011-2237952 (Order entered Feb. 15, 2013) (hereinafter Electric RMI Final Order). [↑](#footnote-ref-2)
2. *Id.* [↑](#footnote-ref-3)
3. *Investigation of Pennsylvania’s Retail Electricity Market: Joint Electric Distribution Company –*

*Electric Generation Supplier Bill* Final Order, Docket No. M-2014-2401345 (Order entered May 23, 2014) (hereinafter Joint EDC-EGS Bill Final Order). [↑](#footnote-ref-4)
4. The inclusion of the EGS’s logo is at the voluntary discretion of the EGS. EGSs were not required to submit their logos. [↑](#footnote-ref-5)
5. *See* Joint EDC-EGS Bill Final Order*.* [↑](#footnote-ref-6)
6. *See* Joint EDC-EGS Bill Final Order at page 39. [↑](#footnote-ref-7)
7. *See Investigation of Pennsylvania’s Retail Natural Gas Supply Market* Final Order, Docket No. I-2013-2381742 (Order entered Dec. 18, 2014). [↑](#footnote-ref-8)
8. The informal comments are publicly available at this docket number, M-2015-2474802. [↑](#footnote-ref-9)
9. *Id*. at 42. [↑](#footnote-ref-10)
10. *Investigation of Pennsylvania’s Retail Natural Gas Supply Market - Joint Natural Gas Distribution Company – Natural Gas Supplier Bill* Final Order, Docket No. M-2015-2474802 (Order entered Apr. 23, 2015) (hereinafter Tentative Order). [↑](#footnote-ref-11)
11. PECO’s *Choice Friendly Bill*, a joint bill, is included as an attachment to this order. *See* Attachment. Emphasis has been added to highlight the supplier logos, the Shopping Information Box and the expanded bill messaging space. [↑](#footnote-ref-12)
12. *See* Gas RMI Final Order at page 42. [↑](#footnote-ref-13)
13. Slamming is the unauthorized changing of a customer’s NGS. [↑](#footnote-ref-14)
14. *See Joint EDC-EGS Bill Final Order* at 7. [↑](#footnote-ref-15)