

Comments of National Fuel Gas Distribution to  
RGQ/REQ Customer Processes Subcommittee (CPS)  
5/7/2003

### Definition of Billing Models

National Fuel objects to the term 'Bundled Billing' and would prefer use of the term Single Billing or as Ameren proposes, Exclusive Billing Model. There are two main issues:

- 1) In both its New York and Pennsylvania jurisdictions, National Fuel's bill to retail customers, even when it provides both sales service and delivery service, provides for distinct sections on the bills for both service components. The rates themselves are unbundled; there is no bundled sales and delivery service. In essence, the format is identical to a Consolidated Bill where the utility is billing party. Use of the word "Bundled" is a step backwards in terms of Customer Choice education.
- 2) In National Fuel's New York jurisdiction, marketers have an option to provide a Single Retailer bill/service to their customers. This is not a combined bill; the marketer buys the delivery service directly from the utility. National Fuel believes that use of a term other than Single Billing de-emphasizes the Single Retailer Model which is actually the choice of most marketers on National Fuel's system.

The work of the CPS and for that matter, both of the Retail quadrants, should reflect existing industry practices and ignoring the Single Retailer Model, even though it is not widely used (but still significantly used) is a form of advocacy against the model. In the interest of compromise, insertion of a parenthetical identifying the Single Retailer Model as an example of Exclusive or Single Billing would be acceptable.

Finally, National Fuel understands that combined utility bills and services do exist in other jurisdictions and that they would fit under the Exclusive or Single Billing description. This categorization in no way should be interpreted that NAESB should consider development of model business practices concern such utility bills and services to be within its scope.