

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion Energy) Case No. 23-107-GA-UNC
Ohio for Approval of Revised Bill Format.)

**MOTION OF THE RETAIL ENERGY SUPPLY ASSOCIATION
FOR LEAVE TO FILE
SUR-REPLY COMMENTS INSTANTER**

The Retail Energy Supply Association (“RESA”)¹ respectfully requests leave to file *instanter* sur-reply comments to the reply comments filed by the Staff of the Public Utilities Commission of Ohio in this docket on June 22, 2023. Staff did not file initial comments or a report in this proceeding. Staff presents facts and positions for the first time in its reply comments, which should have been presented through initial comments. Without the requested leave, RESA has no opportunity to respond to Staff’s June 22, 2023 comments. Further details related to the good cause and reasons supporting RESA’s motion for leave to file sur-reply comments *instanter* are set forth in the attached Memorandum in Support. A copy of RESA’s sur-reply comments is also attached as Exhibit A.

Respectfully Submitted,

/s/ Gretchen L. Petrucci
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¹ The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

**MEMORANDUM IN SUPPORT
OF THE MOTION FOR LEAVE TO FILE SUR-REPLY COMMENTS *INSTANTER*
BY THE RETAIL ENERGY SUPPLY ASSOCIATION**

The East Ohio Gas Company d/b/a Dominion Energy Ohio (“Dominion”) filed an application in February 2023 asking for authority to modify its bill format, in part, to add the price-to-compare message a second time on the bills of its shopping-eligible customers. RESA was the only party to file initial comments on June 1, 2023, in accordance with the schedule set by the Attorney Examiner. Dominion and Staff filed reply comments on June 22, 2023. RESA presents good cause why this request for leave to file sur-reply comments *instanter* should be granted. Staff’s comments, for the most part, do not respond to RESA’s comments – instead, they present new facts and positions that were not presented earlier, including:

- Staff’s claim that Dominion’s application is “updating the placement and display of the price-to-compare message”;
- Staff’s opinion regarding Dominion’s proposed bill format’s compliance with Ohio Adm.Code 4901:1-13-11(B)(13);
- Staff’s concerns regarding Dominion’s current bill format;
- PUCO Call Center statistics – and an interpretation of what those statistics show;
- Reasons why customers called the PUCO Call Center in October 2022;
- Staff’s opinions on the impact of the second PTC message;
- Staff’s opinions about Dominion’s design constraints;
- Staff’s new alternative for the PTC to be placed in a third and different location (page two of the bill); and
- Staff’s suggestion that a rule waiver be granted (no waiver was requested in Dominion’s application).

RESA did not previously have an opportunity to consider or comment on Staff's new facts and positions because Staff did not file anything in this case until its June 22, 2023 reply comments. RESA has prepared this motion for leave and the attached sur-reply comments and there will not be any undue delay caused by granting RESA's motion for leave. Rather, RESA's request is reasonable and fair. In addition, the Commission will benefit from understanding the positions of suppliers on these additional matters and the sur-reply will better inform the Commission for its consideration of the application and issues in this proceeding.

The Commission has granted requests for leave to file sur-replies after finding – just as RESA is arguing here – that granting leave was reasonable or helpful, would allow the Commission to be more fully advised, and/or the record would be more fully developed. For example, sur-reply comments from Duke Energy Ohio, Inc. were allowed as reasonable to respond to issues raised in Staff's reply comments and replies to Duke's sur-reply comments were allowed as reasonable based on new information in Duke's sur-reply comments. *In the Matter of the Application of Duke Energy Ohio, Inc., for Approval of a Waiver of Specific Sections of the Ohio Adm.Code*, Case No. 22-43-GE-WVR, Finding and Order at ¶¶ 9 and 10 (March 23, 2022). Also, in *In the Matter of the Application of Duke Energy Ohio, Inc. for Approval to Implement a Capital Expenditure Program*, Case Nos. 13-2417-GA-UNC et al., Entry (August 26, 2014), Commission Staff sought permission to file sur-reply comments to more fully develop the record and the Attorney Examiner granted that request. *See also, e.g., In the Matter of the Application of Ohio Power Company to Establish a Competitive Bidding Process for Procurement of Energy to Support Its Standard Service Offer*, Case No. 12-3254-EL-UNC, Entry at ¶ 16 (May 23, 2013) (leave to file sur-reply comments granted when matters were first raised in reply comments); *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval to Implement a Capital*

Expenditure Program, Case No. 11-6024-GA-UNC, Finding and Order at ¶ 5 (December 12, 2012) (the Commission accepted sur-reply comments, stating that the sur-replies are “helpful to resolving these matters”); and *In the Matter of the Complaint of McLeodUSA Telecommunications Services, Inc. dba PAETEC Business Services and LDMI Telecommunications, Inc. v. AT&T Ohio*, Case No. 11-3407-TP-CSS, Entry at ¶31 (October 12, 2011) (sur-reply comments regarding a motion to dismiss on the merits were allowed “[s]o that the Commission will be more fully advised”).

RESA’s motion for leave to file sur-reply comments *instanter* is reasonable and presented for good cause. Since the Commission has the flexibility and discretion to allow the filing of sur-reply comments, the Commission should grant RESA’s motion for leave. No harm will result from granting RESA’s request for leave. Instead, granting RESA leave will ensure that a fair opportunity has been given to respond to facts and comments first raised in Staff’s reply comments. RESA respectfully requests that the Commission grant this motion for leave to file *instanter* sur-reply comments to Staff’s reply comments.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio’s e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 27th day of July, 2023.

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THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The East)
Ohio Gas Company d/b/a Dominion Energy) Case No. 23-107-GA-UNC
Ohio for Approval of Revised Bill Format.)

**SUR-REPLY COMMENTS
OF
THE RETAIL ENERGY SUPPLY ASSOCIATION**

I. Introduction

The East Ohio Gas Company d/b/a Dominion Energy Ohio (“Dominion”) filed an application in February 2023 asking for authority to modify its bill format to add, among other things, the price-to-compare message a second time on the bills of its shopping-eligible customers.¹ The Retail Energy Supply Association (“RESA”) was the only party to file initial comments on June 1, 2023, in accordance with the schedule set by the Attorney Examiner. Dominion and Staff timely filed reply comments on June 22, 2023. RESA is submitting these sur-reply comments to address Staff’s reply comments, which presented multiple facts and positions for the first time in this proceeding.²

RESA urges the Commission to reject Staff’s reply comments that claim to support the addition of a second and unnecessary price-to-compare message on certain customer bills. First,

¹ The Retail Energy Supply Association does not oppose the other proposed changes to Dominion’s current bill format – a proposed privacy notice and proposed corrections for the notice on how to contact the Commission and the Office of the Ohio Consumers’ Counsel.

² The comments expressed in this filing represent the position of RESA as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

duplicating the existing price-to-compare message a second time on certain customer bills will be a substantive change to the bill format that will be harmful to the competitive market. The purpose of a second price-to-compare message is plain – to emphasize via an elevated message every month from Dominion instructing customers (including shopping customers) that they should question and reconsider their decision to shop and that the standard choice offer (“SCO”) is the sole comparison point. The proposal goes too far by having the utility repeatedly lead customers to question their decision to shop.

Second, the current price-to-compare message placement, contrary to Staff’s claims, is not out of compliance with the Commission’s requirement in Ohio Adm.Code 4901:1-13-11(B)(13). The Commission approved the placement of the predecessor message, which also was required to be prominently displayed, and that bill format was re-approved several times thereafter. Those approvals establish that the current placement of the price-to-compare message complies with the current Commission rule. As a result, there is no need for the proposed, harmful second message. Third, Staff’s statistics in its reply comments do not demonstrate a need for a second price-to-compare message on the customer bills. In fact, the statistics do not demonstrate anything other than the fact that less than one percent³ of the Dominion customers have called the Commission Call Center purportedly for Competition Issues/Inquiries. Staff’s low statistics do not justify a significant and harmful change in the bill format, and should not be relied upon. Fourth and last, Staff presents an alternative proposal that, if only one message is left on the bill, it be moved to the second page of the bill. That proposal is not warranted and would be an illogical change.

³ Calculated by totaling the calls made over the 13-month period as reflected on page 3 of Staff’s reply comments divided by 1.2 million. Dominion had at least 1.2 million customers in the May 2022-May 2023 time period. See the Commission’s “Natural Gas Choice Activity” webpage at <https://puco.ohio.gov/utilities/electricity/resources/ohio-customer-choice-activity> (accessed July 27, 2023) and Dominion Energy’s Earnings Calls – Q2 2022 at 27, Q3 2022 at 34, Q4 at 41, and Q1 2023 at 20 – in the Quarterly Materials (Presentation Section) on the Investor Relations webpage at <https://investors.dominionenergy.com/financials-and-reports/quarterly-materials/default.aspx> (accessed July 27, 2023).

Staff's reply comments should not be adopted. RESA urges the Commission to leave the price-to-compare message as is, without further changes as proposed by Dominion and Staff.

II. Sur-Reply Comments

A. Staff's comments ignore that Dominion's application proposes to substantively change (not update) its long-established, Commission-approved bill format for residential and small commercial customers, and do so in a competitively harmful manner.

Staff's reply comments incorrectly create the impression that Dominion's application is an unassuming "update" to the current bill format, that the "update" is needed to bring the residential and small commercial customer bills into compliance with the requirements of Ohio Adm.Code 4901:1-13-11(B)(13), and that the "update" is simply providing information. *See* Staff Reply Comments at 1, 2 and 4. These characterizations are incorrect for several reasons. First, Dominion's application is not updating the placement or the display of the price-to-compare message because, under Dominion's application, it will keep the current placement and the current text of the price-to-compare message as is. Dominion's proposal is to duplicate that same price-to-compare message a second time, in a second location, on only certain customer bills. This is not an update; the proposal is a substantive change intended to have a substantive impact – as explained further below, the second price-to-compare message is intended to drive customers to question/reconsider their shopping decisions and to look specifically to the SCO. Staff's characterization is incorrect and should be rejected.

Second, Staff contends at page 2 of its reply comments that a second price-to-compare message is needed because the current location of the message is not compliant with Ohio Adm.Code 4901:1-13-11(B)(13), apparently because Staff now thinks the price-to-compare message is not prominently displayed. Staff fails, however, to explain in its reply comments why the price-to-compare message is no longer compliant when a prominently displayed notice has

been a requirement since at least 2011 and Dominion’s bill format has been approved numerous times with the notice placed as it exists today.⁴ Dominion inserted the current price-to-compare message into its bills in 2021 after Ohio Adm.Code 4901:1-13-11(B)(13) took effect.⁵ That message replaced the Apples-to-Apples notice previously required by the former Ohio Adm.Code 4901:1-13-11(B)(26)⁶ and the former Ohio Adm.Code 4901:1-13-11(B)(27).⁷ All of those rules required that the message/notice be prominently displayed and the Commission approved the current location, thus finding it compliant with the then-applicable rules. Staff presents nothing to demonstrate why the price-to-compare message is now – years later – noncompliant with the same requirement under which the Commission approved the existing placement as prominently displayed. That omission from Staff’s reply comments is telling – there is no noncompliance.

Third, Staff opined on page four of its reply comments that the second price-to-compare message is merely providing information. As RESA argued in its initial comments, the duplication of the message on the bills a second time is not merely providing information – the bills already provide the exact same information today. Repeating the price-to-compare message a second time on the bills of residential and small commercial customers every month is intended to do much

⁴ *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of a General Exemption of Certain Natural Gas Commodity Sales Services or Ancillary Services etc.*, Case No. 07-1224-GA-EXM, Entry (March 18, 2009) (Apples-to-Apples notice was placed in the “Billing, Service Inquiries or Concerns” Section of the bills and approved as appropriate). The Apples-to-Apples notice with the same placement was included in subsequent bill formats that were approved by the Commission in: (a) *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of a Revised Bill Format*, Case No. 12-889-GA-UNC, Finding and Order (April 11, 2012); (b) *In the Matter of the Amendment of Certain Rules of the Ohio Administrative Code to Implement Section 491.021, Revised Code*, Case No. 11-4910-AU-ORD, Application (March 13, 2012) automatically approved; and (c) *In the Matter of the Application of The East Ohio Gas Company d/b/a Dominion East Ohio for Approval of [a] Revised Bill Format, etc.*, Case Nos. 17-926-GA-UNC et al., Finding and Order (May 3, 2017).

⁵ *In the Matter of the Commission’s Review of the Minimum Gas Service Standards in Chapter 4901:1-13 of the Ohio Administrative Code*, Case No. 19-1429-GA-ORD, Finding and Order (February 24, 2021).

⁶ *In the Matter of the Amendment of Certain Rules of the Ohio Administrative Code to Implement Section 491.021, Revised Code*, Case No. 11-4910-AU-ORD, Finding and Order (November 29, 2011).

⁷ *In the Matter of the Commission’s Review of Chapter 4901:1-13 of the Ohio Administrative Code, Regarding Minimum Gas Service Standards*, Case No. 13-2225-GA-ORD, Finding and Order (July 30, 2014).

more – it is intended to drive customers to question/reconsider their shopping decisions and to skew the analysis for participating in the market toward the SCO as the sole point of comparison and the rate to review.⁸ For the shopping customers who would receive the bills, they will be instructed by Dominion each month to reconsider their shopping decision because the message says “it may be useful” for them to compare supplier offers with the SCO rate. Two price-to-compare messages on the bill implies urgency, particularly since the bill contains little other duplication and the price-to-compare message is distinctly different from other information that is currently duplicated on the bill. It is obvious that two price-to-compare messages on each bill will have harmful effects and is not simply “providing information.” Staff’s arguments should be rejected and the proposed change to add a second price-to-compare message should be denied.

B. Call Center statistics do not illustrate what Staff claims, and adding a second price-to-compare message to the bills is not the solution.

Staff presented in its reply comments at page 3 a chart reflecting statistics on the “contacts” received by the PUCO Call Center over the period May 2022 to May 2023. Staff claims that the higher number of contacts (coded as competitive issues and inquiries)⁹ from Dominion’s customers indicates that Dominion’s customers have difficulty finding information on their bills,

⁸ RESA is not speculating about the intent. Staff and others have previously supported bill format changes intended to drive customers to question/reconsider their shopping decisions and to skew the analysis for participating in the market toward the SCO (or the electric equivalent) as the sole point of comparison. For example, Ohio Power Company proposed in 2020 to add a second, but different price-to-compare message at the top of its bills to educate customers on how to “get a better value for electricity” by an up-front message about the price to compare. *In the Matter of Ohio Power Company for Approval of a Change in Bill Format*, Case No. 20-1408-EL-UNC, Application at 2. In that same case, Staff supported Ohio Power Company’s 2020 bill format application, stating that “placing the PTC information in a prominent location on the customer’s bill is a significant enhancement to the value of the PTC as an educational tool.” Staff Comments at 4 (November 2, 2020). In that same case, OCC argued that Ohio Power Company’s proposal was only “one step—though by no means the only necessary step—toward protecting customers from unreasonably high marketer charges” and that that proposal “benefits customers by providing them with the information they need to see whether switching to obtain service from a marketer is saving them money” *Id.*, OCC Initial Comments at 4 and 7 (November 2 2020).

⁹ Staff explained at page 3 of its reply comments that “competitive issues and inquiries” is a general category when Staff provides education about Choice and the Energy Choice website.

and claims that difficulty would be solved by having the price-to-compare message on the front of the bill. Staff further claims that the customer contacts during the month of October 2022 in particular were due to an educational letter sent by Dominion, indicating that customers have difficulty finding information on their bills.

Staff's claims about the contacts received should be rejected for several reasons. First and foremost, there is no information about the calls other than noting that a small number of Dominion customers called the Commission and Staff-coded the calls as competition issues/inquiry calls. Even assuming that the customers were asking about the Choice program or the Energy Choice website (or requesting its Apples-to-Apples chart), that is insufficient to establish that customers are having troubles with finding information on their bills or that customers have difficulty with the price-to-compare message because of its placement. It is also possible that callers mistakenly contacted the Commission instead of Dominion. Without anything in the record to explain or provide further context to the calls, there is nothing to support Staff's claim that those calls demonstrate that Dominion's customers have difficulty finding information on their bills. Second, the limited number of contacts does not establish a widespread issue for which a harmful and significant change to the bill format is needed. Even if the Commission assumed (which it should not) that the calls were by separate callers all of whom stated that they had difficulty finding the price-to-compare message on their bills, the number of calls is from an extremely small number of customers – less than one percent of the Dominion customers. Such a small data set should not be a basis for making a significant change to the bill format that will harm the market.

Third, while Staff ascribes significance to the larger number of calls from Dominion customers as compared to three other Ohio natural gas companies, that difference is irrelevant. It is not surprising that there were more contacts from Dominion customers during those months, as

compared to the other three large natural gas companies in Ohio. Unlike those other utilities, Dominion has been engaged for more than a year in an education campaign about the Choice program as a whole. Dominion customers have been encouraged to consider their options and make inquiries. A greater number of Dominion customers, therefore, may have contacted the Commission to inquire about Choice, not necessarily because a greater number of Dominion customers have difficulty finding information on their bills. Fourth, the spike in contacts to the Commission Call Center in October 2022 cannot be specifically attributed to a difficulty finding information on the bills, as Staff claims.¹⁰ Before and after that month, natural gas prices were increasing sharply¹¹ due to numerous factors across the globe and customers may have contacted the Commission to discuss options because of the price of natural gas.

The call statistics do not show what Staff claims in its reply comments. The call statistics also do not support a second price-to-compare message on customer bills. Therefore, the Commission should disregard the statistics and reject Staff's unsupported claims.

C. Staff's new proposed alternative for the price-to-compare message is confusing and not logical.

Staff presented the following on page four of its reply comments as an alternative to the price-to-compare message proposal in the application:

Staff believes it would be better if the price to compare statement was placed in a location on the front page but recognizes that there may be design constraints on Dominion's current bill format. Therefore, Staff is not

¹⁰ RESA also does not accept, and actually questions, Staff's claim that the spike in Call Center contacts in October 2022 was "due to the education letter that Dominion sent to all its customers." Staff Reply Comments at 3. Dominion has informed members of the Customer Education Collaborative that it has not received more contacts after sending the education letter. Even if it is presumed the calls to the Commission Call Center were due to the education letter, the customers' calls may be because the letter (not the bills) confused the callers. Nonetheless, a spike in contacts to the Commission's Call Center in that specific month does not mean Dominion customers have difficulty finding information on their bills or that any such problem is solved or addressed by duplicating the price-to-compare message on the bills.

¹¹ See, e.g., "Dominion Energy's Standard Choice Offer Rates Historical Chart" on the Commission's website at <https://puco.ohio.gov/utilities/gas/resources/dominion-energy-sco-historical-chart> (accessed July 27, 2023).

opposed to the price to compare statement being prominently displayed on the second page of the bill as proposed, with the exception for the Percentage of Income Payment Plan customers and customers in threat of disconnection. Staff sees no harm in keeping the price to compare statement in two places on the bill. However, if only one message can remain on the bill, Staff recommends that the Commission grant a waiver of the price to compare statement in those situations that Dominion outlined in its application that will cause the price to compare statement to be removed from the second page, until such a time as Dominion updates its bill format. If this waiver is granted, Dominion could remove the price to compare statement from the last page.

Staff's statements above about its alternative proposal are confusing. In the first instance, while recognizing that there are design constraints associated with placing the price-to-compare message, Staff appears to propose that one message remain on the bill (and not two), and that the message be placed on the second page of the bills.¹² Regardless, Dominion has not proposed to display the price-to-compare message on the second page of its bills and the only proposal before the Commission is that contained in Dominion's application. Moreover, the second page of Dominion bills is not a logical location for the price-to-compare message because that page explains the payment plans and billing terms upon which the billed amounts on the first page are based. Payment plans and billing terms are wholly unrelated to the price-to-compare message. It is, therefore, not logical to insert the price-to-compare message on the second page. The Commission should not accept Staff's alternative and simply leave the price-to-compare statement as it exists today and has been approved by this Commission multiple times.

III. Conclusion

Staff's arguments in support of the application should be rejected. The proposal to add a second price-to-compare message on the customer bills is a substantive change – duplicating the existing price-to-compare message – that is intended to be harmful and will be harmful to the

¹² Staff states without any record evidence that placement on the second page will not work for all customers (namely, the Percentage of Income Payment Plan customers and customers in threat of disconnection).

competitive market. A second price-to-compare message is not just providing information as Staff claims – it will be an emphasized message from Dominion instructing customers (including shopping customers) *every month* in multiple spots on the bill that they should question and reconsider their decision to shop and instructing that the SCO is the sole comparison point. The proposal, therefore, is unreasonable. The price-to-compare message should remain as is, without further changes.

Respectfully Submitted,

/s/ Gretchen L. Petrucci

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Summary: Motion for Leave to File Sur-Reply Comments Instantly, with Sur-Reply
Comments electronically filed by Mrs. Gretchen L. Petrucci on behalf of Retail
Energy Supply Association.