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June 28, 2011

VIA E-MAIL

Silvan B. Lutkewitte, III, Chairman
Independent Regulatory Review Commission
333 Market Street, 14th Floor
Harrisburg, PA 17101

Re: Natural Gas Distribution Companies and Promotion of Competitive Retail
Markets; Docket No. L-2008-2069114

Dear Chairman Lutkewitte,

Direct Energy Service, LLC ("Direct") a member of the Retail Energy Supply Association ("RESA"), has provided Comments to the Commission at several earlier stages of this rulemaking process and recently provided comments to the Independent Regulatory Review Commission ("IRRC"), prior to the Commission's withdraw of these regulations from consideration by the IRRC on May 18, 2011.

On June 9, 2011, the Commission issued a Secretarial Letter and Annex A clarifying the Regulations that were promulgated by Order entered January 13, 2011.

RESA supports the clarifications contained in Annex A to the Secretarial Letter. RESA also supports the Commission's decision not to make any substantial changes to the Regulations. The Commission in these rules further ensures that customers do not face double charges for switching to a competitive supplier and therefore subsidies for utilities. For example, the Commission continued to ensure customers pay for only the services they receive by clarifying the costs associated with reconciliation and did not remove the e-factor from the price to compare despite the Office of Consumer Advocate and the Natural Gas Distribution Companies' Comments submitted on June 16, 2011. Therefore, RESA urges IRRC to abstain from further revision to the Regulations as contained in Annex A and reject comments by other parties requesting that IRRC engage in further substantive revisions.

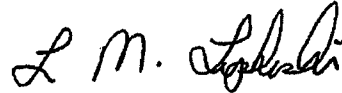
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Accordingly, RESA offers its support for the revisions made by the Secretarial Letter and Annex A, issued June 9, 2011, and urge the IRRC to expeditiously approve the revised regulations.

Very truly yours,

A handwritten signature in black ink, appearing to read "L M. Lepkoski". The signature is written in a cursive style with a large initial "L" and "M".

Lauren M. Lepkoski

LML/kra