

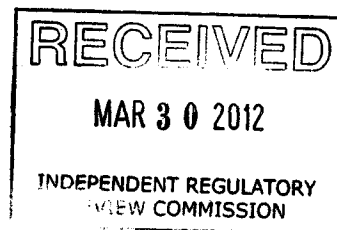
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March 29, 2012



**VIA ELECTRONIC FILING AND HAND DELIVERY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

RE: *Revisions to Code of Conduct at 52 Pa. Code § 54.122*; Docket No. L-2010-2160942;  
**SUPPLEMENTAL COMMENTS OF INTERSTATE GAS SUPPLY, INC. AND  
SHIPLEY ENERGY TO PROPOSED RULEMAKING ORDER**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the corrected first page to Supplemental Comments that were previously filed on March 27, 2012 under the incorrect Docket No. L-2008-2069114. Please replace the incorrect first page of said Supplemental Comments with the enclosed, corrected first page.

Thank you for your attention to this matter and should you have any questions, please do not hesitate to contact me.

Very truly yours,

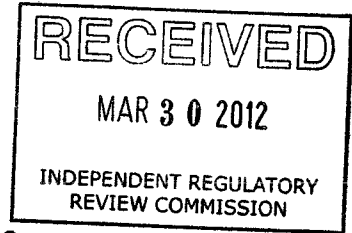
A handwritten signature in black ink, appearing to read "Todd S. Stewart". The signature is stylized and somewhat cursive.

Todd S. Stewart  
Counsel for Shipley Energy Company,  
and Interstate Gas Supply, Inc.

TSS/alh  
Enclosure

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION



*Revisions to Code of Conduct* :  
*at 52 Pa. Code § 54.122* : Docket No. L-2010-2160942

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**SUPPLEMENTAL COMMENTS  
OF INTERSTATE GAS SUPPLY, INC., AND SHIPLEY ENERGY  
TO PROPOSED RULEMAKING ORDER**

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Interstate Gas Supply, Inc. (“IGS”) and Shipley Choice LLC d/b/a Shipley Energy (“Shipley”), hereby submit the following supplemental comments to the Proposed Rulemaking, *Revisions to Code of Conduct at 52 Pa. Code § 54.122*; at Docket No. L-2010-2160942 (“Rulemaking Order”), which was published in the Pennsylvania Bulletin on February 11, 2012.

In the Commission’s Proposed Rulemaking Order (42 Pa. Bull. 797), the Commission reiterates that EDC’s must provide EGS’ “with direct access, which means that EGS’ can use the EDC’s transmission and distribution system on a non-discriminatory basis at rates, terms, and conditions of service comparable to the EDC’s own use of the system.” (*Id.*) The EGS Parties suggest that the term "direct access" includes other functions that may not be readily apparent, such as the billing systems of EDCs. That is, if an EDC is providing billing services for additional products and services for any entity affiliated or non-affiliated, the EDC should be required to provide such expanded services for other EGS’ operating on its system. While the Commission may consider, as part of the ongoing RMI process, the extent to which EDCs should provide services such as billing for energy-related products and service on a more far-reaching basis, the EGS contend that if EDCs provide such services already, that they should provide them equally. The EGS’ also believe that on an ongoing basis the Commission should consider requiring EDCs or their affiliates, to provide more access to the bill for related products and

services provided by EGS' and include appropriate cost recovery mechanisms within that arrangement.

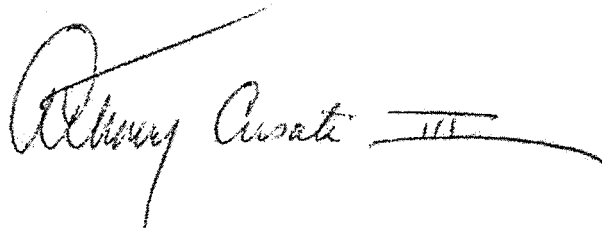
Respectfully submitted,



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Matt Sommer, Vice President  
Shipley Energy

Respectfully submitted,



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Anthony Cusati, III, Regulatory Affairs  
Interstate Gas Supply, Inc.

March 27, 2012