BEFORE

THE PUBLIC UTILITIES COMMISSION OF OHIO

| In the Matter of the Commission's Review | | | | | |) | |
|--|---------|-----------|----|-----|------|---|-------------------------|
| of | Chapter | 4901:1-13 | of | the | Ohio |) | Case No. 13-2225-GA-ORD |
| Administrative Code, Regarding Minimum) | | | | | |) | • |
| Gas Service Standards. | | | | | |) | |

SECOND ENTRY ON REHEARING

The Commission finds:

- (1) By Finding and Order issued on July 30, 2014, the Commission adopted new Ohio Adm.Code 4901:1-13-14 and amended existing Ohio Adm.Code 4901:1-13-01, -02, -03, -04, -05, -06, -08, -09, -10, -11, -12, and -13, pursuant to its review of the minimum gas service standards (MGSS). The Commission also ordered that existing Ohio Adm.Code 4901:1-13-07 be adopted with no changes.
- (2) R.C. 4903.10 states that any party who has entered an appearance in a Commission proceeding may apply for a rehearing with respect to any matters determined therein by filing an application within 30 days after the entry of the order upon the Commission's journal.
- (3) On August 29, 2014, The East Ohio Gas Company d/b/a Dominion East Ohio (DEO), Vectren Energy Delivery of Ohio, Inc. (VEDO), and Columbia Gas of Ohio, Inc. (collectively, Joint Companies) filed an application for rehearing of the Commission's Finding and Order issued on July 30, 2014. The Office of the Ohio Consumers' Counsel (OCC) filed a memorandum contra the Joint Companies' application for rehearing on September 8, 2014.
- (4) By Entry on Rehearing issued on September 25, 2014, the Commission granted the application for rehearing filed by the Joint Companies for further consideration of the matters specified in the application for rehearing.
- (5) In their application for rehearing and memorandum in support, the Joint Companies first argue that the acceleration of the specified timeframe for new service installations and rescheduled completion dates from five business days to three

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business days under Ohio Adm.Code 4901:1-13-05(A)(1) and (A)(4) will require substantial and unjustifiable increases in the cost of service. Specifically, the Joint Companies assert that compliance with the new timeframe will require major increases in investment and labor, with estimated reprogramming and testing costs of approximately \$300,000, plus annual labor and other operating expenses ranging from estimates of \$628,000 to \$1.5 million, on a per-company basis. The Joint Companies contend that, in the absence of any apparent need for the amended rule, such cost increases are not warranted. Further, the Joint Companies maintain that the Commission's goal of achieving consistency with the standards for the electric industry is not reasonable under the circumstances or a sufficient basis for the costs. Citing factors such as the Commission's winter reconnect order, the Joint Companies point out that gas and natural gas utilities experience seasonal swings in new service requests unlike the electric industry. The Joint Companies add that there are physical differences between gas and electric service, such that gas service installations are more time consuming and require access to customer appliances and piping systems, while many gas meters are located inside the customer's property. The Joint Companies conclude that the accelerated three-day timeframe for new service installations and rescheduled completion dates will be a difficult standard to meet and will delay the scheduling of routine work for other customers, whereas the five-day timeframe enables the gas and natural gas utilities to consistently meet customer needs in a cost-effective manner.

(6) In its memorandum contra, OCC responds that the Joint Companies' arguments are not persuasive and should be rejected. Specifically, OCC asserts that the Joint Companies' projected cost impact associated with the rule changes does not constitute a major increase and, in any event, the Joint Companies may seek to recover their costs through a distribution rate case. OCC also points out that the Joint Companies failed to provide any supporting documentation or explanation of how the alleged increases were estimated or whether improvements in efficiency may offset any of the alleged costs. With respect to the need for the rule changes, OCC argues that customers should not be required to file

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formal complaints before they are afforded a just and reasonable minimum level of service, as the revised rule would provide. Finally, OCC emphasizes that, during the winter heating season, customers may have the greatest need for timely new service installations.

(7) The Commission finds that the Joint Companies' application for rehearing regarding the three-day timeframe for new service installations and rescheduled completion dates under Ohio Adm.Code 4901:1-13-05(A)(1) and (A)(4) should be denied. In the Finding and Order, we determined that the Joint Companies offered no support for their claims that the three-day timeframe would substantially increase costs, create a backlog in service requests, or guarantee that the gas and natural gas companies fail to meet the minimum service We further determined that the standard for new service installations should be the same for the electric and gas and natural gas companies. Upon review of the Joint Companies' application for rehearing, the Commission finds that the Joint Companies' arguments have already been thoroughly considered and addressed in the Finding and Order. Finding and Order at 11-12. We agree with OCC that the Joint Companies' estimated cost impact associated with the rule changes does not constitute a major increase under the circumstances and, regardless, the benefit to customers of having service installed within a reasonable amount of time, particularly during the winter months, outweighs the projected cost. We also point out that the objective of the rule was never to encourage the gas and natural gas companies to program their systems to schedule new service installations to occur exactly five days after the date of the request for service. Rather, the purpose and intention of the rule is that the gas and natural gas companies should strive to complete new service installations as quickly as possible, while providing some cushion to allow the occasional installation to occur after five days. In fact, as recently as in the prior review of the MGSS, the Commission encouraged the gas and natural gas companies to take every reasonable action to connect new service as quickly as possible, particularly during the winter months. In re Commission's Review of Chapter 4901:1-13 of the Ohio Administrative Code, Case No. 09-326-GA-ORD, Finding and Order (July 29, 2010) at 27. In any event, the revised rule

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requires only that 90 percent of new service installations be completed within three business days, in recognition of the reality that there will be times when the gas and natural gas companies will not be able to complete all new service installations within three days. Although the Joint Companies emphasize that there are differences between the gas and electric industries, the Commission notes that such differences have already been accommodated by the fact that the electric companies, under Ohio Adm.Code 4901:1-10-09(A)(1), are required to comply with the three-day timeframe for 99 percent of new service installations, whereas the gas and natural gas companies have only a 90-percent requirement.

(8) Next, the Joint Companies question the Commission's adoption of amended Ohio Adm. Code 4901:1-13-05(C)(4) and new Ohio Adm.Code 4901:1-13-05(C)(5), which require that, if either the gas or natural gas company or the customer, respectively, is unable to meet a scheduled appointment, the company shall offer the customer either a next-business-day appointment with no expected arrival time window or a fourhour window appointment within two business days. Specifically, the Joint Companies argue that paragraph (C)(5) unreasonably favors customers that choose to cancel their appointments over those whose appointments are cancelled by the gas or natural gas company. The Joint Companies point out that, pursuant to paragraph (C)(4)(b), customers that have their appointments cancelled by the gas or natural gas company cannot reschedule until after the date of the missed appointment, while those customers that choose to cancel an appointment may select another appointment without the same restriction. The Joint Companies assert that customers that choose to cancel their appointments should not receive favored treatment and priority rescheduling and, as drafted, paragraph (C)(5) would essentially allow customers to obtain next-business-day appointments at will. Further, the Joint Companies argue that the new rule would create an improper incentive and encourage gamesmanship, disrupt the gas or natural gas utility's ability to maintain orderly schedules, and require major increases in field resources to ensure compliance. The Joint Companies conclude that customers that cancel or fail to appear for their

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appointments should be required to take the next available date and appointment window.

- (9) OCC responds that Ohio Adm.Code 4901:1-13-05(C)(5) does not favor customers that cancel appointments. OCC also argues that it is unlikely that the changes to paragraphs (C)(4) and (C)(5) would wreak havoc on the gas and natural gas utilities' ability to maintain orderly schedules or that customers would have the detailed understanding of the rules necessary to game the scheduling system. OCC adds that the Joint Companies have not shown or even alleged that customers have abused the scheduling system.
- (10)The Commission finds that the Joint Companies' application for rehearing regarding the rescheduling of appointments under Ohio Adm.Code 4901:1-13-05(C)(4) and (C)(5) should be denied. In the Finding and Order, we determined that existing paragraph (C)(4) should be revised and new paragraph (C)(5) should be adopted to require that, if either the company or the customer, respectively, is unable to meet a scheduled appointment, the company shall offer the customer either a next-business-day appointment with no expected arrival time window or a four-hour window appointment within two business days. Finding and Order at 14-15. The Commission does not agree with the Joint Companies' position that paragraph (C)(5) favors customers that cancel an appointment over customers that have an appointment cancelled by the gas or natural gas company under paragraph (C)(4). The intention of the rule is to afford comparable treatment in the rescheduling of service appointments, regardless of whether the initial appointment was cancelled by the customer or the company. We agree with OCC that it is unlikely that customers will seek to abuse the rule to such extent that it will disrupt the scheduling systems used by the gas and natural gas companies. The Commission notes, however, that nothing precludes the gas and natural gas companies from monitoring this issue and, if problems are documented, raising the issue in the next review of the MGSS.
- (11) Finally, the Joint Companies dispute the Commission's adoption of Ohio Adm.Code 4901:1-13-11(C), which requires that residential bills issued from outside the state of Ohio have a due date no less than 21 days from the date on the bill.

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According to the Joint Companies, the requirement is unnecessary and would require substantial reprogramming on the part of DEO and VEDO, which currently use out-ofstate printers. The Joint Companies emphasize that out-ofstate printers can provide least-cost services, with no delay in the customer's receipt of the bill. The Joint Companies note that DEO and VEDO have taken steps to ensure that customers have no less time to pay their bills than if the bills were printed in Ohio, which the Joint Companies believe renders the 21-day due date requirement unnecessary. The Joint Companies further note that the rule change would effectively require DEO to reprogram its billing and credit processes, with estimated costs of more than \$1.5 million. The Joint Companies explain that DEO's billing and credit processes are highly dependent on the existing due dates, meaning that the rule change would require DEO to completely revise its current method of linking together its billing and credit and collection systems, despite the fact that the current process is highly effective and beneficial to customers. Specifically, the Joint Companies point out that, under DEO's current system, customers receive sufficient and cost-effective notice of pending disconnection and have an adequate period of 16 days from the bill date to pay their bills, while past due receivables and bad debt expense have been reduced, as well as printing and mailing costs. The Joint Companies argue that, with a 21-day due date requirement in place, it would be difficult for DEO to coordinate disconnection notices and billing, causing a major impact on collection activity and a substantial increase in bad debt costs flowing through to customers. The Joint Companies conclude that there are better and less costly ways in which to ensure that customers have sufficient time to pay their bills. The Ioint Companies recommend the rule impose a more general timeliness requirement or, alternatively, a due date of no less than 17 days from the date on residential bills issued by outof-state printers, which would not require extensive reprogramming of DEO's and VEDO's systems.

(12) In response, OCC contends that the 21-day timeframe for bills issued by out-of-state printers provides customers with a reasonable amount of time to pay their bills. OCC asserts that the alleged cost impact of the rule change is not enormous, as 13-2225-GA-ORD -7-

the Joint Companies claim, and, in any event, the costs may be included in a distribution rate case filing. OCC further asserts that the rule change would enable customers to pay their bills on a timely basis and, thus, avoid late payment charges and disconnection.

The Commission continues to find that residential customers (13)receiving bills issued from outside the state of Ohio should have a reasonable amount of time to pay their bills. Finding However, in light of the substantial and Order at 24. reprogramming that would be required of DEO and VEDO to accommodate a 21-day timeframe for out-of-state residential bills, the Commission finds that the Joint Companies' proposal to shorten the timeframe to 17 days is a reasonable compromise that appropriately balances the interests of the gas and natural gas companies that elect to use out-of-state printers as a means to minimize costs, and the vital need of residential customers to have adequate time to pay their bills. Accordingly, we find that the Joint Companies' request for rehearing on this issue should be granted, to the extent set forth herein, and Ohio Adm. Code 4901:1-13-11(C) should be modified to reflect the 17-day timeframe. The Commission notes, however, that the gas and natural gas companies should endeavor to find a cost-effective way to provide residential customers a 21-day timeframe to pay bills issued from outside the state of Ohio. We continue to believe that a 21-day period is a more appropriate timeframe, as reflected by our adoption in Ohio Adm.Code 4901:1-10-22(B)(10) of a 21-day requirement for the electric companies.¹ Commission, therefore, will continue to monitor this issue and may adopt, in the future, a 21-day requirement for the gas and natural gas companies.

It is, therefore,

ORDERED, That the application for rehearing filed by the Joint Companies be granted, in part, and denied, in part. It is, further,

In re Comm. Review of Chapter 4901:1-10, Ohio Adm. Code, Regarding Electric Companies, Case No. 12-2050-EL-ORD, Finding and Order (Jan. 15, 2014), Second Entry on Rehearing (May 28, 2014).

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ORDERED, That attached revised Ohio Adm.Code 4901:1-13-11 be adopted. It is, further,

ORDERED, That the rules set forth in the appendix to the Finding and Order, as amended by this Second Entry on Rehearing and attached hereto, be filed with the Joint Committee on Agency Rule Review, the Secretary of State, and the Legislative Service Commission, in accordance with R.C. 111.15. It is, further,

ORDERED, That the final rules be effective on the earliest date permitted by law. Unless otherwise ordered by the Commission, the five-year review date for Ohio Adm.Code Chapter 4901:1-13 shall be in compliance with R.C. 111.15. It is, further,

ORDERED, That a copy of this Second Entry on Rehearing be sent to the gaspipeline industry list serve. It is, further,

ORDERED, That a copy of this Second Entry on Rehearing be served upon all regulated gas and natural gas companies, all competitive retail natural gas suppliers, OCC, the Ohio Gas Association, the Ohio Petroleum Council, the Ohio Oil and Gas Association, and all other interested persons of record.

THE PUBLIC UTILITIES COMMISSION OF OHIO

Thomas W. Johnson, Chairman

Steven D. Lesser

M. Beth Trombold

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Entered in the Journal

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Barcy F. McNeal

Secretary

4901:1-13-11 Gas or natural gas company customer billing and payments.

- (A) This rule applies to <u>all</u> gas or natural gas company bills that do not include, including those issued on behalf of any retail natural gas supplier or governmental aggregator charges. Requirements for natural gas consolidated billing appear in rule 4901:1 29-12 of the Administrative Code Gas or natural gas companies shall make dual billing and consolidated billing available to retail natural gas suppliers and governmental aggregators.
- (B) Bills issued by or for the gas or natural gas company shall be accurate and rendered at monthly intervals and shall contain clear and understandable form and language. Each bill shall display all of the following information:
 - (1) The customer's name, billing address, service address, and account number, and, if applicable, the retail natural gas supplier or governmental aggregator account number.
 - (2) The gas or natural gas company's name and its payment address.
 - (3) The gas or natural gas company's twenty-four hour, local or toll-free telephone number for reporting service emergencies.
 - (4) A statement that customers with bill questions or complaints should call or write the gas or natural gas company first. The bill shall list the gas or natural gas company's local or toll-free telephone number(s) and the address where a question or complaint may be sent.
 - (5) The following text:

"If your complaint is not resolved after you have called (name of utility), or for general utility information, residential and business customers may contact the public utilities commission of Ohio (PUCO) for assistance at 1-800-686-7826 (toll free) from eight a.m. to five p.m. weekdays, or at http://www.puco.ohio.gov. Hearing or speech impaired customers may contact the PUCO via 7-1-1 (Ohio relay service).

The Ohio consumers' counsel (OCC) represents residential utility customers in matters before the PUCO. The OCC can be contacted at 1-877-742-5622 (toll free) from eight a.m. to five p.m. weekdays, or at http://www.pickocc.org."

- (6) A<u>The identification of the applicable</u> rate schedule, if applicable.
- (7) The dates of the service period covered by the bill.
- (8) The billing determinants, if applicable:

- (a) Beginning meter reading(s).
- (b) Ending meter reading(s).
- (c) Multiplier(s).
- (d) Consumption(s).
- (e) Fixed monthly customer charge.
- (9) The rate for purchase of the gas or natural gas commodity, expressed in dollars and cents per Mcf or Ccf, reflecting either of the following:
 - (a) The gas cost recovery rate.
 - (b) The rate for the commodity service, if the company has been granted an exemption under section 4929.04 of the Revised Code.
- (10) The total charge attributable to the rate for purchase of the gas or natural gas commodity, expressed in dollars and cents, reflecting either of the following:
 - (a) The gas cost recovery rate.
 - (b) The rate for the commodity sales service, if the company has been granted an exemption under section 4929.04 of the Revised Code.
- (11) If applicable, the name of the retail natural gas supplier or governmental aggregator in close proximity to the retail natural gas supplier or governmental aggregator commodity charges, as well as a toll-free or local telephone number and address for customer billing questions or complaints regarding retail natural gas supplier or governmental aggregator charges.
- (11)(12)The total charge attributable to the gross receipts tax, expressed in dollars and cents, and the gross receipts tax rate. This requirement only applies to gas or natural gas companies that allow for competitive retail natural gas services on their system.
- (12)(13)The identification of estimated bills.
- (13)(14)The due date for payment.
- (14)(15)The total charges for the current billing period.
- (15)(16) Any late payment charge or gross and net charges, if applicable.
- (16)(17)Any unpaid amounts due from previous bills, customer credits, and total amounts due and payable.

- (17)(18)The current balance of the account, if the residential customer is billed according to a budget plan.
- (18)(19)The current gas and electric charges separately, if the customer is billed for gas and electric service on the same bill.
- (19)(20)If applicable, each charge for a service that is either nontariffed or nonregulated and, with regard to services that are, the name and toll-free telephone number of each provider of service.
- (20)(21) Any nonrecurring charge(s).
- (21)(22)Any payment(s) or credit(s) applied to the account during the current billing period.
- (22)(23)If applicable, all the percentage of income payment plan_plus (PIPP_Plus) billing information:
 - (a) Current PIPP Plus payment.
 - (b) PIPP Plus payments defaulted (i.e., past due).
 - (c) Total PIPP Plus amount due.
 - (d) Total account arrearage.
 - (e) Any other information required to implement the PIPP <u>Plus</u> program under Chapter 4901:1-18 of the Administrative Code.
- (23)(24) An explanation of codes and abbreviations used.
- (24)(25) If a customer's selected retail natural gas supplier or governmental aggregator bills separately for its supplier charges, the supplier's name and a statement that such supplier is responsible for billing the gas supplier charges and such supplier will separately bill the customer for that component of natural gas service.
- (25)(26) The customer's historical consumption during each of the preceding twelve months, with a total and average consumption for such twelve-month period, if the company has a choice program.
- (26)(27) A prominently displayed "apples-to-apples" notice, if the company has a choice program.
- (27)(28) A statement, either appearing directly on the bill, in a bill insert, or as a separate mailing, of any payment arrangement agreed upon by the customer and the company.

(28)(29) Other information required by Ohio law or commission rule or order.

- (C) All bills shall be due no earlier than fourteen days from the date of the postmark on the bill. If the bill is sent electronically, the bill shall not be due earlier than fourteen days from the date of the electronic postmark on the bill. If the bill is mailed by means that does not place a postmark on the bill (i.e., such as permit mailing), the bill shall not be due earlier than fourteen days from the date on the actual bill. All bills mailed without postmarks shall be mailed no later than the day listed on the bill. For residential bills being issued from outside the state of Ohio, the due date shall be no less than seventeen days from the date on the actual bill.
- (D) A gas or natural gas company proposing any new bill format shall file its proposed bill format with the commission for approval. If the commission does not act upon an application for a new bill format approval within forty-five days, the proposed bill format shall automatically be approved on the forty-sixth day.
- (E) Payment methodologies and parameters.
 - (1) Each gas or natural gas company shall make payment options available in a number of ways to customers.
 - (a) Those waysPayment options may include, but are not limited to: cash, check, or money order payments in person to the company or a payment agent; check or money order through the mail; check over the telephone; credit card; or electronic money transfers.
 - (b) Each gas or natural gas company shall, upon request, provide customers with an updated list of its available payment options and descriptions thereof, and shall post the updated list on its website.
 - (c) The list of available payment options shall also include the name and street address/location of the nearest payment center and/or local authorized agent, and all applicable fees for utilizing the various methods available for payment of customer bills.
 - (d) The gas or natural gas company may not deny a customer the use of one or more of the payment options solely because the customer's account is in arrears.
 - (2) If a gas or natural gas company accepts payments from customers via authorized agents, the company shall provide signage to the authorized agent with its logo, or other appropriate indicators, that affirm the payment location as an authorized agent of the gas or natural gas company. The gas or natural gas company may not deny a customer the use of one or more of the payment options solely because the customer's account is in arrears.

- (2)(3) Each gas or natural gas company shall not charge more than two dollars for processing payments by cash, check, or money order at authorized agent locations. Customers may not be charged for processing their payments by check or money order through the mail. Customers may be charged for processing their payments by check over the telephone, by credit card, or electronic money transfers and such charges will be evaluated by the commission.
- (3)(4) When a customer pays the bill at the gas or natural gas company's business office or to an authorized agent of the company, the payment, including any partial payment, shall be immediately credited to the customer's account where feasible, and, in any event, be credited to the customer's account as of the date received at the business office or by the agent. When payment is received at the company's business office through other means, such as by mail or on line, the payment shall be posted immediately upon receipt to the customer's account, where feasible, and in any event, be credited to the customer's account on the date received.
- (4)(5) No gas or natural gas company shall disconnect service to a customer who pays the total amount due (or an amount agreed upon between the gas or natural gas company and the customer to prevent disconnection) on the account by the close of business on the disconnection date listed on the disconnection notice. Payment received by an authorized agent of the gas or natural gas company shall constitute receipt of payment by the company.
- (5)(6) Each gas or natural gas company shall establish a written policy for its personnel at its business offices and for its authorized agents to handle billing disputes, requests for payment arrangements, and for the reporting of payments made by customers due to their receipt of a disconnection notice, in order to prevent disconnection of service. If such matters cannot be handled by an agent authorized to accept payments, the agent shall provide customers with the gas or natural gas company's local or toll-free telephone number.
- (7) When applicable, a supplier agreement between a gas or natural gas company and a retail natural gas supplier must provide that if the gas or natural gas company collects customer payments on behalf of the retail natural gas supplier, then customer's liability to the retail natural gas supplier ceases to the extent of a payment made and applicable to the customer's retail natural gas supplier account.
- (F) Any gas or natural gas company that issues billing statements electronically shall comply with each of the following requirements:

- (1) A customer receiving a billing statement electronically shall not be required to pay that bill electronically or pay electronically any future bill statements. All payment methods shall continue to be available to the customer.
- (2) No enrollment or usage fees shall be assessed to a customer who chooses to receive bills and/or customer information electronically.
- (3) The electronic billing statement shall include all requirements listed in paragraph (B) of this rule.
- (4) The gas or natural gas company shall maintain a secure and encrypted internet location that is to be accessed only by the customer of record after completing a secure registration process.
- (5) Any fees to accept electronic payments shall be clearly disclosed in payment window(s).
- (6) Any payment made electronically shall be treated as a payment made at the company business office and shall be posted to the account in accordance with paragraph (E)(3)(E)(4) of this rule. The time needed to post the payment to the account shall be clearly stated.
- (G) Handling partial payments.
 - (1) <u>Nonconsolidated bills.</u> Each gas or natural gas company shall credit any customer's partial payments in the following order:
 - (a) First, credit past due distribution and sales service charges.
 - (b) Second, credit current distribution and sales service charges.
 - (c) Third, credit past due and current nonregulated or nontariffed charges.
 - (2) Consolidated bills. Partial payments applied towards any past due amount on a bill or the balance due on a disconnection notice must be apportioned in the following order:
 - (a) First, credit past due gas or natural gas company service and delivery charges.
 - (b) Second, credit current gas or natural gas company service and delivery charges.
 - (c) Third, credit retail natural gas supplier or governmental aggregator charges.

If the customer pays the entire amount past due or more, any amount paid over the amount past due shall be applied first to gas or natural gas company service and delivery charges.

- (3) Budget billing payments and payments in full of the undisputed amount related to a bona fide dispute do not constitute partial payments. Payments made on accounts for which there is a bona fide dispute shall be credited to the undisputed portion of the account.
- (H) Any billing adjustments shall be made according to paragraph (G) of rule 4901:1-13-04 of the Administrative Code.
- (I) Transfer of customer billing information.
 - (1) The nonbilling retail natural gas supplier shall furnish the applicable required bill content information to the billing party in a timely manner and in a mutually agreed upon electronic format for inclusion in the consolidated customer bill.
 - (2) The billing gas or natural gas company shall include in the consolidated bill all required bill content information furnished by the nonbilling retail natural gas supplier.
 - (3) An entity ordered by the commission to provide any bill content, message, insert, or notice remains responsible to provide such information to its customers, although the information may be provided through the consolidated bill.
- (I) Except in cases where the gas or natural gas company is engaging in a purchase of receivables program, when a customer switches from a retail natural gas supplier, the gas or natural gas company shall identify for the customer and state on the bill the date after which the billing party will no longer remit payments to the previous retail natural gas supplier and include any outstanding balance due the previous retail natural gas supplier.