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# United Gas MANAGEMENT INC.

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Canada

February 4, 2000

Mr. Gary Vigorito  
Secretary  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, OH 43215-3793

Re: PUCO Case No. 98-593-GA-COI, et al.  
Response to Commission Entry on Door-to-Door Solicitations

RECEIVED - MARKETING DIV  
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PUCO

Dear Mr. Vigorito:

United Gas Management, Inc. is a participant in the Columbia Gas of Ohio Choice Program and is one of the remaining participants in the Cincinnati Gas & Electric Pilot program. In responding to the Commission's request for comments relating to the specific "Door to Door" marketing technique, United would like the Commission to be mindful that Door-to-Door marketing is the single most successful form of marketing in the Ohio Choice programs, providing more choice customers than any other form of marketing.

While United does not view the conditions proposed by the Commission as being unduly onerous, United would like the Commission to be mindful that regulations or rules generated by the Commission which are intended to affect marketers would likely have to be encapsulated within tariff documents to be enforceable. If that is to be the case, the Commission should be mindful that such a structure places utilities in the awkward position of responsibility for the monitoring and possibly enforcement of such rules and regulations. This position is awkward, in that the attitudes towards Choice vary from utility to utility, as do the levels of sophistication necessary to comprehend the mechanics of competition.

United is also concerned that the adoption of rules which effectively repeat portions of existing Ohio Consumer Law may lead to a lack of clarity and an inconsistency of enforcement, and could also muddy the waters of jurisdiction. Where rules are created, they should be created clearly, and should not serve to obviate or obfuscate existing rules or laws.

United would prefer, and recommends that the Commission consider, the formation of a working group or collaborative to consider voluntary Best Standards of Practice, as has been done in other jurisdictions. These voluntary standards can be used as part of the consumer education process, and assist customers further in making their choices.

All of which is respectfully submitted,

United Gas Management, Inc.

Brian Dingwall  
Vice President, Legal & Regulatory Affairs

cc: Parties of Record

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