

Empire Natural Gas Corporation Proposed Questions and Comments 7-31-12

Proposed Definitions - Energy Broker and Representative Strawman proposal

1. How would an Agent for a customer(s) be classified?
2. How would a "named" Customer Group be classified?
3. It would seem to us that an aggregator should be included within the broker classification.
4. What is meant by "Should the requirements be the same as for ESCOs as is in several states?" We are not familiar with what is being done in other states?
5. We agree that only ESCOs should be able to enroll a customer.
6. If an ESCO is in the middle of an existing contract term, that was won through a broker's RFP – and then that broker doesn't get a license. Will there be some sort of phase in or grandfathering clause?
7. If a broker's license is revoked will the ESCO be able to continue to serve the customers involved?
8. Whom would be responsible to disclose to the customer the amount of broker compensation?

Electronic Communications

1. We do not use these electronic methods so we really don't have any comments or questions.

General Comments

In our opinion it seems that most of the current/past problems occur mainly in the Residential Sector. So maybe any new regulations should be directed and limited to the Residential Sector. It may be very costly and burdensome for the NY PSC to take over regulation of thousands of consultants and hundreds of aggregators.

Respectfully Submitted:

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President

