Exhibit A
SCANA Energy's Proposed Changes (in redline) to Proposed Rule

515-7-8 SERVICE QUALITY MEASURES (SQMs) ~~STANDARDS~~ FOR CERTIFICATED MARKETERS ~~AND REGULATED PROVIDERS~~

Rule 515-7-8-.01 Commission Authority and Scope

The Georgia Legislature has empowered the Georgia Public Service Commission to promulgate rules and regulations to establish service quality measures (SQMs) ~~standards~~ for each certificated marketer ~~and regulated provider~~ in Georgia.

Rule 515-7-8-.02 Definitions

Terms used in these rules have the following meaning:
(a) "Act" means the Natural Gas Competition and Deregulation Act, as provided for in Official Code of Georgia Annotated (O.C.G.A.) § 46-4-150 et seq.
(b) "Ancillary service" means a service that provides necessary support ~~is ancillary~~ to the receipt or delivery of natural gas, including without limitation, storage, balancing, peaking, and customer services.
(c) "Benchmark" means a standard or point of reference against which a Service Quality Measure (SQM) may be compared or assessed. For the purposes of this rule, the Commission has established benchmarks for several Service Quality Measures (SQMs).
(d~~c~~) "Commission" means the Georgia Public Service Commission.
(e~~d~~) "Commodity sales service" means the sale of natural gas exclusive of any distribution or ancillary service.
(f~~e~~) "Consumer" means a retail customer of commodity sales service or of firm distribution service who uses such service(s) for the normal domestic and housekeeping requirements such as cooking, water heating, central or space heating, air-conditioning, refrigeration and lighting. ~~or services primarily for personal, family, or household purposes.~~
(g~~f~~) "Customer service" means a function related to serving a retail customer including without limitation, billing, meter reading, turn-on service, and turn-off service. Notwithstanding any provision of law to the contrary, any person may perform one or more customer services without first becoming certificated in accordance with O.C.G.A. § 46-4-153; provided however, that such service may only be performed in compliance with all state and federal laws pertaining to the safety of natural gas pipelines and distribution systems and any other applicable safety standards.
(h) "Data Reporting Filing" means the Marketer's monthly filing of the tracked data within a recording period.
(i~~g~~) "Distribution service" means the delivery of natural gas by and through the intrastate instrumentalities and facilities of a gas company or of a marketer certificated pursuant to O.C.G.A. § 46-4-153, regardless of the party having title to the natural gas.
(j~~h~~) "Electing Distribution Company" or "EDC" means a gas company that elects to become subject to the provisions of the Act and satisfies the requirements of O.C.G.A. § 46-4-154.
(k~~i~~) "Gas" means natural gas.

(lj) "Gas company" means any person to whom a certificate of public convenience and necessity has been issued by the Commission to own, operate, acquire, or construct any intrastate pipeline or distribution system, or any extension thereof, for the sale of natural gas.
(mk) "Interruptible" means a type of distribution service that is subject to interruption or curtailment.
(nl) "Marketer" means any person certificated by the Commission to provide commodity sales service or distribution service pursuant to O.C.G.A. § 46-4-153 or ancillary services incident thereto. For purposes of this Rule, including without limitation with respect to reporting, remediation, and penalties, the term Marketer includes the Regulated Provider shall be treated as if it were a separate and independent Marketer.
(o(o) "Probation period" means the one (1) year period commencing on the first day immediately after the end of the remediation period; provided, however, if the Marketer fails to meet or exceed the applicable SQM Benchmark in any one month within the initial one (1) year probation period, the probation period shall automatically be extended such that the probation period shall not end until the Marketer has met or exceeded the applicable SQM Benchmark for twelve consecutive recording periods.
(p) "Recording period" means the month in which required data is tracked pursuant to the Commission approved SQMs rules.
(pq) "Remediation period" means the time allowed by this ruleRule for a marketer to correct its failure to meet a service quality measure benchmark.
(qmrm) "Regulated provider of natural gas" means the entity selected by the Commission to provide consumers with natural gas commodity service and ancillary services incident thereto in accordance with O.C.G.A. § Code Section 46-4-166.
(rnsn) "Retail customer" or "retail purchaser" means a person who purchases commodity sales service or distribution service, and such purchase is not for the purpose of resale.
(st)" Staff" means the Georgia Public Service Commission Staff.
(tu) "Successful Remediation" means a Marketer has successfully met anthe applicable SQM benchmark established by the Commission during the Remediation Periodthird recording period of the remediation period as defined in section 515-7-8-.02(pq).

Rule 515-7-8-.03 Service Quality Measures (SQMs) Standards: Customer Service, Billing, and Meter Reading

Every Marketer shall be required to meet SQMs service quality standards to ensure that quality service is afforded to all natural gas customers in Georgia. Specifically, all Marketers shall meet Commission established benchmarks in the following areas:

a. Call Center Service Level;
b. Requests for information from the EDC as authorized by the Tariff or Commission Order and certain requests as determined necessary by the Commission;
c. Billing Accuracy and Timeliness;
d. Responsiveness to Consumer Inquiries and Complaints;
e. Meter Reading Accuracy, if the Mmarketer either directly or through a third party is performing the meter reading function;
f. Meter Reading Timeliness, if the mMarketer either directly or through a third party is performing the meter reading function;

g. Transmittal of Meter Reading Data to the EDC, including Timeliness and Accuracy of data, if the marketer either directly or through a third party is performing the meter reading function; and
h. Transmittal of accurate and timely electronic transactions of consumer data to the EDC.

If a Marketer fails to meet an SQM benchmark established by the Commission, the Marketer shall notify Staff in the data reporting filing of the missed SQM benchmark ~~in that month's reporting filing~~.

Rule 515-7-8-.04 Service Quality Measure (SQM): Call Center Service Levels

The purpose of this SQM is to measure the percentage of consumer calls answered within 180 seconds or less during a month to ensure a prompt response to a customer's call. This SQM will be measured over one (1) calendar month.

Marketers shall be responsible for answering at least 80% of calls within 180 seconds. If placed into an Interactive Voice Response (IVR), the 180 seconds start when the customer makes the selection to either speak with an agent or to be called back and maintain their place in the queue.

For the purpose of this ~~rule~~Rule, "calls" shall include calls in queue terminated by the calling party, after 180 seconds, prior to speaking with an agent. The formula for measuring this benchmark shall be as follows:

(Total number of calls answered by an agent in 180 seconds or less / Total number of ~~offered~~ calls) *100.

Rule 515-7-8-.05 Service Quality Measure (SQM): Billing Accuracy

The purpose of this SQM is to measure the accuracy of a bill sent to a customer by a Marketer versus the number of bills corrected over a period of one (1) month. Marketers shall be responsible for maintaining a 98.5% monthly billing accuracy rate.

The formula for measuring this benchmark shall be as follows:

(Total number of bills issued ~~/~~ Total number of bills canceled and corrected) / Total number of bills issued) *100.

Rule 515-7-8-.06 ~~-4~~ Service Quality Measure (SQM) ~~Standards~~: Responsiveness to the Georgia Public Service Commission

Every Marketer shall be required to meet each SQM benchmark ~~service quality standards~~ to ensure compliance with Commission Orders. Reporting is not required for this measure.

Rule 515-7-8-.07 Service Quality Measure (SQM): Meter Reading Accuracy, Meter Reading Timeliness, Transmittal of Meter Reading Data to the EDC

Until such time that the Commission determines that meter reading is a competitive service performed by the Marketers, reporting is not required for these measures.

Rule 515-7-8-.08 Service Quality Measure (SQMs): Transmittal of accurate and timely electronic transactions of consumer data to the EDC

Until such time that the Commission determines that transmittal of accurate and timely electronic transaction of consumer data to the EDC is a required metric, reporting is not required for these measures.

Rule 515-7-8-.09 Additional Service Quality Measures

In addition to the SQMs set forth in this Rule, the Commission may establish additional SQMs as the Commission may from time to time deem necessary.

Rule 515-7-8-.1006 Methodology for Establishment and Review of Benchmarks and Penalties

a. The Commission shall determine the appropriate benchmarks necessary to measure whether a Marketer ~~or regulated provider~~ has complied with the SQMs ~~service quality standards~~ established by the Commission pursuant to this Rule, as well as the appropriate penalties that may be assessed against a Marketer ~~or regulated provider~~ that fails to comply with such SQMs ~~service quality standards~~;

b. ~~The~~Except where the benchmark and penalties are established by this Rule, the Commission shall conduct a hearing for the purpose of establishing the appropriate benchmarks to be utilized in determining whether a Marketer has complied with the SQMs ~~service quality standards~~ established herein, as well as the appropriate penalties to be assessed against a Marketer ~~or regulated provider~~ that fails to comply with such SQMs ~~service quality standards~~. Prior to such hearing, the Marketers, the Commission Staff and any other interested party shall file any proposed benchmarks and penalties for consideration by the Commission. Following such hearing, the Commission shall issue an Order approving and adopting appropriate benchmarks and associated penalties; and

c. Following the establishment of initial benchmarks and penalties, the Commission may conduct hearings annually for the purpose of reviewing the SQMs ~~service quality standards~~ adopted by the Commission, as well as the benchmarks and penalties established as described in Section (b) above. Prior to such annual hearings, the Marketers, the Commission Staff and any other interested party may file proposed revisions to the SQMs, ~~service quality standards~~ benchmarks and penalties for consideration by the Commission.

Rule 515-7-8-.1107 Reporting and Compliance

Each Marketer shall file reports with the Commission demonstrating its performance with each SQM ~~regard to the service quality standards~~ established by the Commission. Such reports shall be filed on the 15th of the following month for the prior month's data, in a form approved ~~at least on a quarterly basis, or on some other periodic basis if ordered~~ by the Commission.

Rule 515-7-8-.12 Remediation

Marketers are expected to meet the Commission established SQM benchmarks each month. If the Marketer fails to meet an SQM benchmark, remediation may be required as set forth in this Rule.

(a) Call Center Service Level Remediation

For the Call Center Service Level SQM, should a marketer miss this benchmark twice within a 12-month period, such Marketer shall go into a 3-month remediation period that will begin ~~starting~~ the first day of the month following the second month in which the Marketer missed the benchmark; and will continue for two (2) additional consecutive months.

Such Marketer shall file with the Commission a Remediation Action Plan (RAP) to identify and explain the deficiency, specify how the deficiency will be remedied, and provide a timetable for remedial activities. The filing shall be made by no later than the last day of the ~~second~~first month of the remediation period. All remedial activities must be completed by the end of the remediation period.

At the conclusion of the remediation period (which will be on the last day of the third month), the Marketer will have five (5) days to file with the Commission a Remediation Report that demonstrates its compliance with the benchmark that was the subject of the RAP. ~~If the deficiencies were not eliminated and the established benchmark was not met, then the Marketer will be assessed a penalty. Such penalty will be due on the 15th of the following month.~~

In order to achieve successful remediation and avoid a penalty, the Marketer, at a minimum, shall meet the established SQM benchmark of 80% for Call Center Service Level during the third month of the remediation period. ~~Marketers failing to meet the benchmark in the third month will be assessed a penalty. That penalty will continue for every month thereafter.~~

~~For a period of one (1) year after filing the~~ If there has not been a successful remediation ~~report,~~, then the Marketer will be assessed a penalty for the third recording period only without regard to the number of recording periods during the remediation period in which the Marketer ~~will remain subject to penalties~~failed to meet or exceed the SQM benchmark for Call Center Service Level. During the probation period, the Marketer shall pay a penalty for each recording period ~~if the deficiency remains or reoccurs. The Marketer will not be given remediation opportunities again until such time as the service provider has demonstrated compliance with the~~it fails to meet or exceed the SQM benchmark for Call Center Service Level. A Marketer who fails to meet or exceed the SQM benchmark for ~~twelve consecutive months.~~Call Center Service Level after the probation period has ended shall be allowed to participate in the remediation procedures set forth in this Rule prior to being obligated to pay a penalty.

~~(b)~~(a) Billing Accuracy Remediation

For the Billing Accuracy SQM, should a marketer miss this benchmark twice within a 12-month period, such Marketer shall go into a 3-month remediation period that will begin ~~starting on~~ the first day of the month following the second month in which the Marketer missed the benchmark; and will continue for two (2) additional consecutive months.

Such Marketer shall file with the Commission a Remediation Action Plan (RAP) to identify and explain the deficiency, specify how the deficiency will be remedied, and provide a timetable for remedial activities. The filing shall be made by no later than the last day of the ~~second~~first month of the remediation period. All remedial activities must be completed by the end of the remediation period.

At the conclusion of the remediation period (which will be on the last day of the third month), the Marketer will have five (5) days to file with the Commission a Remediation Report that demonstrates its compliance with the benchmark that was the subject of the RAP. ~~If the~~

~~deficiencies were not eliminated and the established benchmark was not met, then the Marketer will be assessed a penalty. Such a penalty will be due on the 15th of the following month.~~

In order to achieve successful remediation and avoid a penalty, the Marketer, at a minimum, shall meet the established SQM benchmark of ~~80%~~98.5% for Billing Accuracy during the third month of the remediation period. ~~Marketers failing to meet the benchmark in the third month will be assessed a penalty. That penalty will continue for every month thereafter.~~

~~For a period of one (1) year after the filing date of the~~If there has not been a successful remediation ~~report,~~, then the Marketer will be assessed a penalty for the third recording period only without regard to the number of recording periods during the remediation period in which the Marketer ~~will remain subject to penalties~~failed to meet or exceed the SQM benchmark for Billing Accuracy. During the probation period, the Marketer shall pay a penalty for each recording period ~~if the deficiency remains or reoccurs. The Marketer will not be given remediation opportunities again until such time as the service provider has demonstrated compliance with the~~it fails to meet or exceed the SQM benchmark for Billing Accuracy. A Marketer who fails to meet or exceed the SQM benchmark for ~~twelve (12) consecutive months.~~Billing Accuracy after the probation period has ended shall be allowed to participate in the remediation procedures set forth in this Rule prior to being obligated to pay a penalty.

Rule 515-7-8-.13~~08~~ Penalties

Pursuant to O.C.G.A. § 46-4-158.1(c), failure to meet an SQM benchmark shall subject a certificated marketer to fines as determined by the Commission.

Penalties shall commence after a marketer fails to ~~eliminate the deficiency~~ complete a successful remediation during the remediation period as explained in Rule 515-7-8-.12.

A presumptive penalty for non-compliance with ~~an~~a SQM benchmark~~,~~ for a recording period during the remediation period (if no successful remediation was completed) or probation period shall be ~~tiered based on the Marketer's market share as shown below:~~

~~**Market Share (MS)**~~	~~**Penalty**~~
~~MS 20% or more~~	~~$25,000 per violation~~
~~20% MS10%~~	~~$20,000 per violation~~
~~10% = MS 5%~~	~~$5,000 per violation~~
~~MS = 5% or less~~	~~$2,500 per violation~~

$25,000. Marketers shall deposit the penalties directly into the Universal Service Fund (USF) escrow account by electronic wire transfer, certified check, or cashier's check. Payments are due by the 15th of the month following the Remediation Report and every 15th of the subsequent month thereafter, if applicable. All penalties will be subject to Commission discretion and Staff, or any interested party may petition the Commission to have penalties adjusted.

~~Failure to comply with any service quality standards adopted by the Commission shall subject a Marketer or regulated provider to civil penalties as determined by the Commission.~~

Rule 515-7-8-.14~~09~~ Force Majeure

The Commission recognizes that a Marketer's ~~or Regulated Provider's~~ performance data may be influenced by factors beyond its control. Accordingly, in the event of a force majeure, as defined by Rule 12 of AGLC's Commission-approved Tariff, a M~~m~~arketer ~~or regulated provider~~ may file a petition for an exception with the Commission seeking to have the scheduled SQMs ~~service quality standards and/or benchmark~~ results modified. The M~~m~~arketer ~~or regulated provider~~ will also be allowed to file an expedited petition seeking immediate relief from a payment of penalties as set forth in these Rules in the event of a force majeure. In any such petition, the M~~m~~arketer ~~or regulated provider~~ shall have the burden of demonstrating that the benchmark was not met due to causes beyond the M~~m~~arketer's ~~or regulated provider's~~ control and which could not have been avoided by exercise of due care. The filing of any such petition shall not stay any payments under these Rules unless otherwise ordered by the Commission.