GEORGIA PROUD
Walton GAS

November 3, 2023

Ms. Sallie Tanner
Executive Secretary
Georgia Public Service Commission
244 Washington Street, SW
Atlanta, Georgia 30334

RE: WALTON EMC NATURAL GAS COMMENTS REGARDING NOTICE OF PROPOSED RULEMAKING - RULE CHAPTER 515-7-8 SERVICE QUALITY STANDARDS FOR CERTIFICATED MARKETERS AND REGULATED PROVIDERS – DN 15296

Dear Ms. Tanner:

Please find enclosed for filing, Walton EMC Natural Gas comments in the above-referenced docket. These comments are being filed with the Commission by means of its Alternative Electronic Filing procedures.

Sincerely,

Phil Weatherly,
Director, Business Development
Walton EMC Natural Gas
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BEFORE THE
GEORGIA PUBLIC SERVICE COMMISSION

IN RE: NOTICE OF PROPOSED RULEMAKING RULE CHAPTER 515-7-8 SERVICE QUALITY STANDARDS FOR CERTIFIED MARKETERS AND REGULATED PROVIDER	)))))	**DOCKET NO. 15296**

COMMENTS OF WALTON EMC NATURAL GAS

Walton EMC Natural Gas appreciates the opportunity to submit comments in response to the Notice of Proposed Rulemaking to amend existing Commission rule 515-7-8: Service Quality Standards for Certificated Marketers and Regulated Providers that was issued on October 3, 2023.

Walton Gas supports the effort to modify the existing rule with respect to clarifying the remediation process, the timeline, the reporting and general compliance. The Proposed Rule represents a positive step toward creating a workable balance of holding marketers accountable while not being overly onerous.

Walton Gas is very focused on maintaining the highest service levels in both our call center and billing operations. Should we fail to meet a benchmark, we will address the issue with the most effective, timely response possible.

There are two points we would like to mention regarding the remediation process:

1.) We think having to meet the "…established SQM benchmark" in the third month of the remediation period may be overly burdensome and, in some cases, may not be practical. We think having a benchmark that is lower in the third month of remediation than the established benchmark is reasonable. A marketer may make considerable progress on

remediating the concerns or issues yet fall just short of the standard and get penalized in the last month of remediation under this rule.

2.) Along the same line, is the actual language in the Billing Accuracy remediation section [515-7-8-.12 (b)] that says "… shall meet the established SQM benchmark of 80% in the third month of the remediation period." The established benchmark for billing accuracy is 98.5%. So, the 80% number does not seem consistent and may need further clarification. However, if it is 80% in the third month of remediation, that illustrates our thought (in point 1) of having the lower benchmark in that third month of remediation.

Thank you again for the opportunity to comment on the proposed rule. We look forward to finalizing a reasonable, workable that results in high service quality measures.

Respectfully submitted this 3rd day of November, 2023.

Phil Weatherly
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