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December 7, 2009

The Honorable Terry Romine
Executive Secretary
Maryland Public Service Commission
William Donald Schaefer Tower
6 St. Paul Street
16th floor
Baltimore, MD 21202

RE: RM35 - REVISED Compliance Filing of Washington Gas
Light
(ML#119143)

Dear Secretary Romine,

On October 8, 2009, Washington Gas Light (WGL) filed a compliance plan to implement COMAR 20.59 in which it elected to implement pro ration of consolidated bill payments rather than a Purchase of Receivables (POR) program. WGL has now submitted a revised filing in which it is seeking approval of a POR mechanism in principle, with a compliance filing to follow. NEM submits this letter to strongly support WGL's proposed POR mechanism.

NEM strongly supports the availability of a POR program without recourse, as perhaps the most determinative factor in supporting retail market development. As we noted in our previously filed comments in this docket, there are a number of reasons why POR programs, in comparison with pro rata payment allocation, are preferable from both a marketer and utility standpoint. These include:

- Permitting marketers to offer competitive options to mass market customers at a lower cost;
- Permitting marketers to better serve credit-challenged customers;
- Leveraging existing utility credit and collections processes;
- Equalization of bad debt among market participants; and
- Utilities retain exclusive control over customer termination for non-payment.

That having been said, we believe that the expenditure of resources to implement RM35, in terms of time and monetary resources, will yield its maximum value in terms of

supplier (and related consumer) participation through WGL's implementation of a POR program.

NEM applauds WGL for its willingness to engage in discussions with the supplier community on the benefits of a POR program and the value that a POR program represents to supporting a vibrant choice program with robust marketer participation. For the foregoing reasons, NEM supports WGL's revised filing of a POR mechanism and supports Commission approval of said mechanism.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Craig Goodman", with a long horizontal flourish extending to the right.

Craig G. Goodman
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