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**Gary A. Jack**  
Assistant General Counsel

February 13, 2012

**VIA OVERNIGHT MAIL**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
400 North Street  
Harrisburg, PA 17120

**RECEIVED**

FEB 13 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: Standards for Electronic Data Transfer and Exchange  
between Electric Distribution Companies  
and Electric Generation Suppliers  
Docket No. M-00960890F0015**

Dear Secretary Chiavetta:

Enclosed for filing are an original and five copies of the Comments of Duquesne Light Company in response to the Commission's Tentative Order in the above proceeding.

Sincerely yours,

Gary A. Jack  
Assistant General Counsel

Enclosure

c: Patricia Burket – via email  
Annunciata Marino – via email

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Standards for Electronic Data Transfer and :  
Exchange Between Electric Distribution : Docket No. M-00960890F0015  
Companies and Electric Generation :  
Suppliers :

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FEB 13 2012

**COMMENTS OF  
DUQUESNE LIGHT COMPANY**

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**I. INTRODUCTION**

On January 13, 2012, the Pennsylvania Public Utility Commission's ("Commission") entered a Tentative Order in the above-captioned proceeding. In the Tentative Order, the Commission set forth two requests for statewide implementation of data control changes from the Electronic Data Exchange Working Group (EDEWG). The Commission further invited interested parties to file Comments to the Tentative Order. Duquesne Light Company ("Duquesne" or "Company") hereby submits its Comments in response to the Tentative Order.

**II. COMMENTS**

**A. EDI CHANGE CONTROL #85 – IDENTIFICATION OF NET-METERING CUSTOMERS**

Duquesne agrees that its net metering customers who switch to an alternative generation supplier from default service have encountered difficulties when they later learn that the particular EGS they switched to does not offer net metering as part of its competitive retail offering. Some customers have made the switch from POLR service assuming a particular EGS offers net-metering service and then later learn they do not, thereby losing a benefit they desire. Duquesne agrees that placing a marker on accounts indicating the account is a net metering account should be helpful for others, such as EGSs, to assist them in becoming aware that a

particular customer is a current net metering customer prior to entering into a contract with that customer.

Currently, Duquesne is making changes to its Eligible Customer List to indicate whether individual customers are net metering customers. Also, by the 2<sup>nd</sup> quarter of 2013, Duquesne's new Customer Information and Billing System, which is in the process of being developed and installed, should be able to automate the process for informing EGSs about net metering customer information. Third, with regard to the specific proposal by the Commission to add a special meter configuration segment to the EDI 814 Enrollment, Change, Reinstatement, and EDI 867 Historical Usage and Historical Interval Usage (867 HY/HIU) transaction sets, Duquesne Light is agreeable and supports that proposed change. However, while Duquesne supports the marking of the account to indicate net metering, the Commission needs to be aware that at the present time Duquesne cannot support automatic 867 HIU transactions. This historical interval usage data is handled manually today. Duquesne plans to implement an automated 867 HIU transaction arrangement by late 2013, with more details to be provided in Duquesne's upcoming Smart Meter filing in late June 2012. Duquesne's new Customer Information and Billing System should eventually be able to handle the automated interval data, but it will be almost several years before operational. Duquesne requests flexibility on the actual implementation date to accommodate this new Customer Information System being installed.

Additionally, Duquesne has already implemented a notification to net metering customers at the time of their enrollment in the net metering program of the consequences of switching to an EGS who does not offer net metering.

The costs to implement this data exchange change are estimated to be \$350,000. Where the Company recovers these costs is uncertain at this time. While the Tentative Order proposes

that the costs be recovered in base rates only, the Company recommends the Commission maintain the flexibility to recover in alternative ways, such as the possibility of utilizing surcharges, deferrals or Purchase of Receivables. At this point in time, the Commission does not need to decide that there is only one way to recover those costs and it should maintain flexibility to permit cost recovery on an individual utility basis.

**B. EDI CHANGE #87--- PEAK LOAD CONTRIBUTION & NETWORK SERVICE PEAK LOAD VALUES**

Duquesne Light is presently making changes to its Eligible Customer List issued monthly to EGSSs to incorporate customer peak load contribution (PLC) and Network Service Peak Load (NSPL) values. Additionally, the Commission is proposing that future values, if available, for PLC and NSPL be included as part of 867 HU/HIU transactions sets. Duquesne Light has no objection to providing future values for PLC. It is calculated at the end of December to become effective the following June 1<sup>st</sup>. However, for NSPL, it has been Duquesne's experience that the value is issued annually by PJM two business days before January 1. As such, there essentially is not a "future" NSPL issued. Rather it is a current value. Accordingly, Duquesne believes that what it can be providing are current and future PLCs and current NSPL values. Nonetheless, Duquesne has no objection to providing whatever data is available and would plan on implementing this as part of its new Customer Information and Billing System. Again, the Commission needs to be aware that at the present time Duquesne cannot support automatic 867 HIU transactions. This historical interval usage data is handled manually today. Duquesne plans to implement an automated 867 HIU transaction arrangement by late 2013, with more details to be provided in Duquesne's upcoming Smart Meter filing in late June 2012. Duquesne's new Customer Information and Billing System should eventually be able to handle the automated 867 interval data, but it will be almost several years before operational. That would appear to

somewhat align with the Commission's proposed implementation date of one year after a final order in this proceeding. Duquesne requests flexibility on the actual implementation date to accommodate its new Customer Information System being installed.

The cost of this proposed change is estimated to be \$150,000. Where the Company recovers these costs is uncertain at this time. While the Tentative Order proposes that the costs be recovered in base rates only, the Company recommends the Commission maintain the flexibility to recover in alternative ways, such as the possibility of utilizing surcharges, deferrals, or Purchase of Receivables. At this point in time, the Commission does not need to decide that there is only one way to recover those costs and it should maintain flexibility to permit cost recovery on an individual utility basis.

### III. CONCLUSION

Duquesne Light supports the two proposed data control changes proposed by the Commission in its Tentative Order entered January 13, 2012 and requests the Commission consider the other comments contained herein.

Respectfully Submitted,



**DUQUESNE LIGHT COMPANY**

By Counsel:

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February 13, 2012

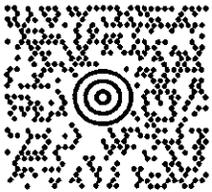
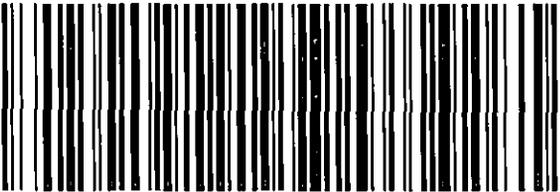
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