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May 20, 2013

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120-0200

**RECEIVED**

MAY 20 2013

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**Re: EDC Customer Account Number Access  
Mechanism for EGSs  
Docket #M-2013-2355751**

Dear Secretary Chiavetta:

Enclosed for filing are the comments of Duquesne Light Company to the April 18, 2013 Tentative Order on EDC Customer Account Number Access Mechanism for EGSs at the above-referenced docket number.

If you have any questions regarding the information provided, please contact me at 412-393-3662 or vedwards@duqlight.com.

Sincerely,

Vernon J. Edwards  
Manager, Regulatory Affairs

Enclosures

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: EDC Customer Account Number Access  
Mechanism for EGSs

Docket No. M-2013-2355751

**COMMENTS OF  
DUQUESNE LIGHT COMPANY**

Duquesne Light Company (Duquesne or Company) hereby submits these comments in response to the PA Public Utility Commission (PUC or Commission) Tentative Order dated April 18, 2013 at the above referenced Docket Number. In its Tentative Order, the Commission has requesting additional input and comments on thirteen specific topics.

Duquesne Light Company has reviewed and fully supports the comments filed by the Energy Association of Pennsylvania.

Duquesne appreciates the opportunity to provide its comments on these topics, as outlined below.

Introduction

Duquesne Light Company has been at the forefront of encouraging customer choice in Pennsylvania and in working with others to try to reap the benefits envisioned by restructuring. Duquesne has implemented many initiatives that support a robust deregulated energy market in Pennsylvania. Today, over seventy-six percent of the total load in Duquesne Light Company's service territory today is provided to customers who have chosen an energy supplier other than Duquesne's default service. Similarly,

residential customers in the Duquesne service area can now choose generation supply offerings being marketed by over forty five different generation suppliers. For Industrial customers, that number is even higher.

Duquesne continues its support of the Commission's efforts to continue growth of the deregulated energy market, and its comments on the specific topics the Commission has requested additional input and suggestions on are set forth below, ordered as they appear in the Commission's Tentative Order:

**1. EDCs may propose using different technologies to provide account numbers. If so, how much variation among utilities would be too confusing or burdensome upon the suppliers using the systems?**

Duquesne feels that a Commission mandate for a universal solution is unnecessary. The EDCs should be given sufficient flexibility to allow design technology solutions which could be implemented timely, and cost effectively, given the variations among existing EDC technology, operating systems and resources. The ultimate solution for any EDC should be carefully weighed against the overall cost to implement and who will be responsible to pay those costs.

However, Duquesne does acknowledge that implementing designs that are similar in nature and functionality could serve to better facilitate ease of use and access to customer account number information by the those EGS's; provided, EDCs are able to recover their costs and implement on a schedule that takes into account the EDC's legacy systems.

**2. Technologies that have been discussed include the internet, interactive voice response (IVR) telephone and electronic data exchange (EDI). Are some technologies preferable to others and if so, why?**

Duquesne would suggest the design of a secure web portal, similar to the DLC Supplier Choice website, as preferable over other technologies. This solution would be the most cost efficient, the least difficult to implement, provide the most user-friendly means to access this information and provide results back to the EGSs the fastest. Additionally, a secure web portal would provide a single point of access for all EGS's, and allow Duquesne to maintain the greatest level of security against unauthorized release of confidential customer information.

**3. In providing account numbers, should there be limits on the response time back from the EDC, and if so, should the timeframes be dependent upon the technology being used?**

*Duquesne believes that the response timeframes will be different and dependent upon the technology utilized. However, Duquesne believes that a secure "self-serve" web portal would provide the EGSs with the greatest "ease of use" and the ability to receive the most immediate response back from the different technology solutions available. Conversely, requests for account number information submitted through EDI transactions, which are submitted through batch processing environment, does not appear to be a working solution as results could not be returned in real time.*

Most importantly, Duquesne Light Company recommends this new process be an automated solution, which once implemented, would have a minimal impact on EDC resources.

**4. What specific identifying data should a supplier be required to submit to the EDC to get an account number? At a minimum, should a customer's name and address be required?**

Duquesne Light Company believes that a customer's name, street address and postal code are the minimum requirements necessary when making a request for a customer account number. However, to the extent required by Commission regulations or Orders, the Company may require other or additional information that would be necessary to specifically identify an individual customer account.

**5. What level of precision is necessary to ensure accurate data?**

Duquesne Light Company views our ability to prevent the release of unauthorized customer information as critical. The EGS can assist in this process and ensure the release of appropriate and accurate data by providing an exact match to the information as it appears on the customers' Duquesne Light Company bill. As stated in the Tentative Order<sup>1</sup>, Duquesne Light Company supports a process developed by stakeholders whereby EGS queries that return a result of either "no hit" or "multiple hit" indicators would then require the EGS requesting the information to work with the customer to obtain the correct name and address information.

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<sup>1</sup> Tentative order at page 7.

**6. The amount and recovery of costs could vary by EDC and by the technology used. If there are significant costs, can they be estimated at this time? Who should be responsible for those costs and what mechanisms should be used to assess and collect costs?**

Without having a more detailed design specification, Duquesne Light Company does not feel it can provide accurate cost estimates at this time. However, speaking generally, Duquesne believes that a self-service secure web-based application would be the quickest and least costly to implement from a development perspective based on current technology employed at the Company.

It is Duquesne's position that EGS's should bear all costs of an EDC requirement to develop and implement new technology associated with design and implementation of an access mechanism that will provide them with customer account number access. Simply stated, the development and implementation of this new functionality would not benefit the EDCs, but rather, assist EGSs with marketing and enrolling customers into their programs. As such, the EDCs should not be required to develop and implement potentially costly programming and system changes without the ability to recover those costs.

**7. What safeguards are needed to ensure that account numbers are accurately communicated and provided only to the customer and supplier involved?**

As stated in its response to Question #5 above, Duquesne views our ability to prevent the release of unauthorized customer information as critical. Duquesne must ensure that only customer information of those involved is released. Duquesne suggests that all participating EGS's be required to:

- a. Obtain a signed Letter of Authorization from the customers, which would be kept on file for use in resolving customer dispute matters, should a dispute occur.
- b. Certify that they have and will retain a record of the Letter of Authorization
- c. Agree to a disclaimer message prior to accessing the Duquesne Light Company web portal for customer information, which states the EGS will use customer information only for purposes authorized by the *customer and has received all necessary authorizations.*

#### **8. What information and format should be required in an LOA?**

Duquesne Light Company acknowledges that the recommendation for what information and format should be required in a Letter of Authorization is being currently being undertaken by a CHARGE working group, and Duquesne Light Company representatives are participating in that work. This working group's task is to develop a template for Letters of Authorization which will be used by the EGSs to obtain customer account number information from the EDCs. The template will also contain specific language designed to advise customers of the types of information which will be released as well as provide EGSs with the account information needed to initiate generation supply service.

As such, Duquesne Light Company commits to continuing participation in that CHARGE working group and providing assistance in developing a recommendation for information and format requirements of LOA's.

**9. Are there possible reporting requirements that should be developed so that the Commission can monitor the effectiveness and security of the systems? This could include things like the total number of account numbers provided and the number of complaints or problems associated with the provision of account numbers under these mechanisms.**

Duquesne Light Company believes that any EDC system implementation criteria should include the capability to identify the requesting EGS and the account information returned by the responding EDC. Duquesne does not believe that development of additional functionality to provide monitoring or reporting capabilities is necessary at this time.

Duquesne acknowledges that the Commission has effective processes and reporting capability already established within the customer complaint processes to allow for monitoring the effectiveness of this new technology. As such, the requesting EGS should be required to maintain a file of all LOA's for PUC review of any instances of customer complaints and for the purpose of PUC audits. Similarly, Duquesne would suggest the Commission consider establishing an affirmatively obligation on the EGSs *to report the number of complaints filed by customers they enrolled regarding incorrect or unauthorized access to customer information*, which would minimize EDC or Commission resources needed to monitor the effectiveness and security of this new process.

**10. What are the appropriate sales channels that would be authorized to use this process?**

It's Duquesne's opinion that a determination on the appropriate sales channels that would be authorized to use this new process should be established by the Commission, not the EDCs. Duquesne would respectfully suggest that, during non-

public venues, such as during door-to-door and telephone sales, the customers should have access to their account information, and use of this solution would not be needed.

Duquesne has a concern that unrestricted use of this sales channel could create greater opportunities for an EGS to solicit customers that do not authorize release of their customer information (via query of any correct name and address located within our service territory), thereby reducing or eliminating viability of the Eligible Customer List.

**11. What process should the EDCs use to develop their solutions, including the level of stakeholder involvement and Commission oversight?**

The Commission has stated in the Tentative Order that it anticipates providing the guidance on the issues discussed within the Tentative Order, including guidance on the development, timeframes, system capabilities and safeguards in which it believes are necessary<sup>2</sup>. With that guidance, Duquesne supports the establishment of a working group to facilitate the design, development timelines and implementation of this new functionality.

**12. What are reasonable timeframes for the development and implementation of these systems?**

Duquesne Light Company believes that the development and implementation of the new account number access mechanism would be dependent on which technology solution chosen to implement and the specific design requirements of that technology. Duquesne Light Company believes that its recommendation for a self-service secure web portal would be the technology solution with the shortest implementation requirements.

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<sup>2</sup> Tentative Order at Page 11

As stated in the Tentative Order<sup>3</sup> Duquesne Light agrees that all EDC Information Technology resources, especially its own, are limited and are currently facing numerous demands. As such, Duquesne Light Company requests the Commission consider and offer guidance on the prioritization it believes this effort should receive over other significant projects currently underway.

**13. Are there any other concerns, suggestions or questions that the Commission needs to address?**

Duquesne Light Company continues to support and promote initiatives supporting customer choice, but has concerns over maintenance of customer privacy and data security, as well as the improper release of customer information if the proper safeguards and mechanisms are not put in place.

We suggest proceeding cautiously against creating an access mechanism that does not fully consider protections against unintentional breaches in data security and the potential for misuse of information acquired by any such process or mechanism..

**Conclusion**

Duquesne Light Company continues to support the Commission's efforts to ensure Pennsylvania electric customers have access to a robust deregulatory energy market. Duquesne Light Company offers recommendations to develop and implement a secure web-based portal as an access mechanism for EDC customer account numbers. Duquesne Light Company believes this would be the fastest and most inexpensive technology solution to implement. Duquesne Light Company has offered comments on its concerns that any solution implemented should insure that the

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<sup>3</sup> Tentative Order at Page 5

appropriate data security provisions are implemented to insure against unintended release of confidential customer information. Lastly, should the Commission require the EDCs implement any account number access mechanism for EGSs, Duquesne Light Company has requested in its comments that the Commission offer guidance on the prioritization this effort should receive over other significant projects currently underway.

Duquesne Light Company appreciates the opportunity to provide its comments.

Respectfully Submitted,

DUQUESNE LIGHT COMPANY

May 20, 2013

UPS CampusShip: View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. Fold the printed sheet containing the label at the line so that the entire shipping label is visible. Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

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Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

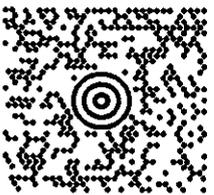
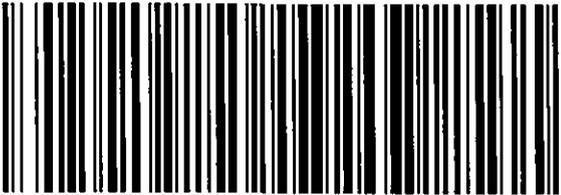
Hand the package to any UPS driver in your area.

Take your package to any location of The UPS Store<sup>®</sup>, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot<sup>®</sup> or Staples<sup>®</sup>) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

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Cost Center: 492 Reference # 2: Docket #M-2013-2355751 <small>CS 15-1-10</small>		 <small>WNTIE80 39.0A 04/2013</small>	