



Duquesne Light

Our Energy...Your Power

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December 31, 2013

Via Electronic filing

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

**RE: Investigation of Pennsylvania's Retail Electricity Market: End State of
Default Service.
Docket No. I-2011-2237952**

Dear Secretary Chiavetta:

In accordance with the Pennsylvania Public Utility Commission's February 15, 2013 Order entered in the above referenced docket, enclosed please find Duquesne Light Company's Seamless Moves and Instant Connects Compliance filing.

Should you have any questions, please feel free to contact me.

Sincerely,

Robert H. Hoaglund, II

Enclosures

cc: Certificate of Service (via First Class Mail)

II. BACKGROUND

1. On February 15, 2013, the Commission issued its *RMI Final Order*. Therein, the Commission directed EDCs to develop and submit plans by the end of 2013 to implement seamless move and instant connect switching processes by June 1, 2015. As described by the Commission, “A ‘seamless move’ is the ability of a customer’s choice of supplier to move with the customer to a new address without interruption. ‘Instant Connect’ is the ability of supply service to start on ‘day one’ of new utility service – without the customer first having to go on default service.” *RMI Final Order*, p. 70. In the *RMI Final Order*, the Commission directed EDCs to work with EGSs to develop these procedures.

2. In May 2013, a group of Pennsylvania EDCs was formed to attempt to develop a uniform approach for implementing seamless move and instant connect processes. After an initial draft process was established, the EDC group sought input from EGSs. Both the EDCs and EGSs then worked collaboratively to attempt to develop a uniform approach. During this process, the group discussed various business rules and technical possibilities that would suit the EGS community as well as EDC systems. After several months and many fruitful meetings, the working group decided that it had a general sense of how this could be accomplished. All parties were in agreement that each EDC would develop a plan based on the objectives relevant to its own business needs.

III. IMPLEMENTATION PLAN

A. SEAMLESS MOVES

1. Overview

3. Under the Company’s current enrollment process, a shopping customer that moves within Duquesne Light’s service territory is first enrolled as a default service customer at the customer’s new service location. The customer must re-enroll with their supplier or choose a new supplier in order to shop. The Company’s existing IT systems and Electronic Data Interchange (“EDI”) transaction process

will not currently allow for a seamless move. The customer is also subject to the 11-day waiting period under the Company's tariff, which includes the 5 day rescission period provided for under the Commission's Order, *Interim Guidelines Regarding Standards for Changing a Customer's Electricity General Supplier*, Docket No. M-2011-2270442, entered October 25, 2012.

4. Under the seamless move process, Duquesne Light proposes to allow eligible shopping customers to retain their current EGS when moving within Duquesne Light's service territory. The customer will not be switched to default service when moving to a new location provided that the rules and conditions set forth below are met.

2. Seamless Move Rules and Procedures

5. The seamless move process will extend to all residential customers as well as commercial and industrial customers that use less than 300 kW of demand as defined in the Company's Retail Tariff (collectively, the "Eligible Customers").¹

6. Service to a qualifying customer's new location must be in the same rate class as the prior location, and the customer must maintain the same supplier billing rate, billing option, and tax exemption percentage. These requirements are designed to protect the customer's existing EGS contract by maintaining the material terms. The EGSs must submit a drop request via EDI if they do not wish to continue service to the customer at the new service location. However, the supplier will still have to maintain supply service to this customer until the next billing cycle, if the drop request from the supplier comes within 11 days of the new start or next meter read date under the existing switching rules. This follows the Commission's previous ruling in the Final Order, *Interim Guidelines Regarding Standards*

¹ Large commercial and industrial customers ("Large C&I") will not be included for seamless moves based on the potential problems that may arise due to PJM scheduling. During the collaborative meetings certain EGSs expressed a preference for excluding Large C&I customers from the seamless move and instant connect procedures. EGSs participating in the Company's territory, which sell to larger customers, typically have more personalized contact with those customers and would be more knowledgeable about when those customers may move. In addition, Large C&I customers have larger usage than other customers and there may be load scheduling issues if these customers are switched under the accelerated switching procedures.

for Changing a Customer's Electricity Generation Supplier allowing for the "11-day rule" as well as the 5-day rescission period.

7. The Company will require customers to provide at least one day's notice prior to effectuating the seamless move. The Company will not permit requests for service to start on the same day as the request nor will it allow customers to back-date service. Back-dated service is a form of service whereby a customer wishes to have a service effective date that is older than the date that the customer calls to initiate service. Same day or backdated service requests will not be accepted because this may not allow adequate time to notify the EGS of the change in service, allow the EDC adequate time to schedule load with PJM Interconnection, LLC ("PJM"), or give the EGS time to determine whether the change is acceptable under their arrangements with the customer.

8. The Company also proposes that a seamless move should not be allowed for any overlapping service lasting more than three days, any customer wishing to start concurrent service, or any continuance of service agreements, which provide for continuance of service in rental properties after a tenant moves out. For continuance of service agreements, also known as landlord/tenant agreements, where the service automatically switches back to the landlord's ownership after the tenant cancels, a seamless move would not qualify because the landlord and the tenant are considered two separate customers.

9. In accordance with the aforementioned controls, the qualifying customer will be required to request to start the new service and end the old service in the same contact with the Company. This allows for the processing of the EDI transactions to facilitate this change to occur on the same day and not on different days which was requested by the EGSs.

10. There must be an active meter at the new location when the customer contacts the Company to effectuate the seamless move. Otherwise, the Company will not have sufficient information to complete the move.

11. An EGS must currently be providing service on the customer's account to be eligible for a seamless move.

3. Technical Feasibility and EDI Transactions

12. Duquesne Light proposes that a new EDI transaction be created to facilitate the seamless move process. The new EDI transaction would be approved by the Electronic Data Exchange Working Group ("EDEWG") consistent with its current procedures. This transaction would include all the pertinent customer information that an EGS would need such as:

- Customer Contact information – new address, name (matching old customer's name);
- Rate class and load profile;
- Bill option, rate code, tax exemption percentage;
- Billing and meter read cycles; and
- Meter information.

13. EDI transactions also should be sent for other reasons that involve the seamless move process. Customers requesting to change the start date of their new service would require an EDI 814 Change request to be sent to the existing EGS detailing the new start date, and an EDI 814 Drop request would also be sent if the customer decided to cancel the new move. These and any other EDI regulations should follow all the existing standards presented in the Pennsylvania EDI Implementation Guides.

4. Seamless Move Transaction

14. If the seamless move criteria have been met, the Company will advise the customer that their EGS supply service will seamlessly move to their new location, and the Company will send a new

move transaction to their EGS. In the move transaction, Duquesne Light will send the EGS information that is similar to what is currently provided in a reinstate-request transaction, including the customer name, service address, and rate class. The Company will also provide the EGS with: (i) the current account number; (ii) the new account number; and (iii) the service start date. Once the move transaction has been sent to the EGS, the EGS will serve the new account as of the service start date.

15. The seamless move may be terminated or voided after the move transaction is complete under certain circumstances, including where the customer: (i) voids or terminates the new account prior to the service start date; (ii) requests to change the service start date on the new account to a date occurring in the past; or (iii) enrolls a new EGS on the current account before the connection to the new account occurs. In these instances, Duquesne Light will send a drop notification to the EGS.

B. INSTANT CONNECTS

1. Overview

16. Under the Company's existing procedure, a new customer is first enrolled in default service upon initially receiving electric service. After the customer begins to receive service and the customer's account is activated, a customer may elect to shop. The customer is subject to the 11-day switching rule, including the 5 day waiting period, under the Company's tariff before the customer can be switched to EGS service. In addition, the customer must wait until the first meter read date after the 11-day period has expired before the customer can be switched to EGS service.

17. Under the proposed instant connect process, new customers will be able to elect to shop with an EGS without being enrolled in default service, provided that customers meet the instant connect rules that are set forth below.

2. Instant Connect Rules and Procedures

18. Much like the eligibility requirements for a seamless move, the instant connect process will extend to all Eligible Customers (as defined above).

19. Customers must provide 11 days prior notice to qualify for the instant connect process.² During the collaborative process, participating EGSs expressed the desire to retain the 11-day advance notice provision, in part to accommodate PJM scheduling purposes.

20. Customers will not be permitted to back date service under the instant connect process because it poses the same scheduling issues identified with backdated service under seamless moves.

21. In order to accommodate instant connections, Duquesne Light will change its system so that it can accept inbound enrollment requests on accounts that are not yet active. The customer will still be responsible for contacting the supplier to initiate service, and the supplier will still be responsible for submitting the service request. The final component of this transaction will be to establish an estimated start date. All of this information will be communicated via the enrollment response sent back to the EGS from Duquesne Light.

3. Technical Feasibility and EDI Transactions

22. No new EDI transactions will need to be created in order to implement instant connects. However, the Company will need to make changes to its internal systems to allow for enrollment requests to be accepted on inactive accounts. This is more of a technical change than a business change. Furthermore, if the Company's plan is approved by the Commission, no further review by EDEWG will be needed because no changes will be made to any business process outside of internal systems.

IV. COST RECOVERY

23. In the *RMI Final Order*, the Commission directed EDCs to address cost issues associated with implementing the accelerated switching program and to provide proposals for recovering such costs. *RMI Final Order*, p. 75.

24. Duquesne Light estimates that it will incur approximately \$600,000 in capital costs to implement the seamless move and instant connect procedures, as described herein.

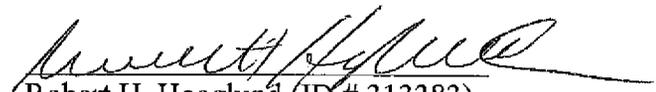
² In Duquesne Light's territory, less than 13% of customers request service 11 days in advance.

25. Duquesne Light currently intends to seek recovery of these costs in its next base rate proceeding.

V. CONCLUSION

WHEREFORE, Duquesne Light Company requests that the Pennsylvania Public Utility Commission issue an Order accepting the Company's plan for implementation of seamless moves and instant connects, as set forth herein.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant).

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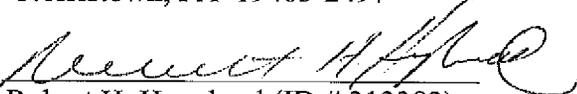
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