



Duquesne Light

Our Energy...Your Power

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Tishekia E. Williams
Senior Counsel

VIA ELECTRIC FILING

January 17, 2014

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

**RE: EDC Customer Account Number Access Mechanism for EGSs
Docket No. M-2013-2355751**

Dear Secretary Chiavetta:

Enclosed for filing please find Duquesne Light Company's Compliance Filing pursuant to the Commission's Final Order in the above-captioned docket.

Please do not hesitate to contact the undersigned if you have any questions.

Sincerely,

Tishekia E. Williams
Senior Counsel, Regulatory

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Duquesne Light Company's Compliance filing has 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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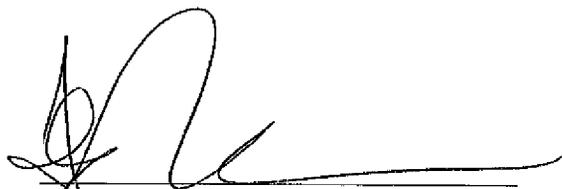
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Date: January 17, 2014



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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

EDC Customer Account Number : Docket No. M-2013-2355751
Access Mechanism for EGSs :
:

**DUQUESNE LIGHT COMPANY'S COMPLIANCE FILING
REGARDING EGS ACCESS TO EDC CUSTOMER ACCOUNT NUMBERS**

I. INTRODUCTION

On July 17, 2013, the Pennsylvania Public Utility Commission ("Commission") entered its *Final Order* regarding electric distribution company ("EDC") customer account number access mechanism for electric generation suppliers ("EGS") in the above captioned docket. The *Final Order* is the result of the work done by the Commission's Office of Competitive Markets Oversight ("OCMO"), EGSs, and EDCs with the goal of strengthening competitive retail electric markets for Pennsylvanians by eliminating potential barriers to shopping. In the *Final Order*, the Commission found that EGSs' inability to access customers' account numbers not available on the Eligible Customer List ("ECL"), particularly in public forums, is a barrier to shopping for competitive electricity. *Final Order* at page 12-13. Accordingly, EDCs are required to submit a compliance filing to the Commission for review and approval detailing their plans for developing a passcode protected secure website portal that will provide EGSs access to customer account numbers in public venues.

In its *Final Order*, page 49-50, the Commission states that EDC compliance filings are expected to demonstrate the EDC's plans for developing a passcode protected secure website portal that will provide EGSs' access to customer account numbers for all rate classes, and discuss the expected costs and proposed cost recovery mechanism. The *Final Order* also directs EDCs to:

- Design a portal to require an EGS to submit the customer's full name, service street address, and five-digit postal code.

- Document the EGSs attestation that they are enrolling the customer in a public location and that they have obtained photo identification and a signed letter of agreement (“LOA”) from the customer.
- Provide a field where the form of customer identification must be documented.
- Return the requested account number, or if a precise match is not possible, an error message indicating what generated the error.
- Track of the usage of the system and be able to identify who accessed what data and when.
- Retain this information for three years and have the ability to be easily provided to regulators upon request.

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby submits this compliance filing detailing the Company’s plan to implement a passcode protected secure website portal that will facilitate competition by enabling EGSs to access account numbers for Duquesne Light customers by May 30, 2014. The Company’s proposed plan is designed to provide EGSs access to customer account numbers that are not available on the ECL and provides a “secure mechanism whose usage is tightly regulated, monitored and tracked.” *Id.* at page 13.

II. IMPLEMENTATION PLAN

A. OVERVIEW OF THE WEBSITE PORTAL

Duquesne Light will develop a secure web portal for use by licensed EGSs to search for customer account numbers for all rate classes. The site will be built using a secure sockets layer¹ and the login form will include CAPTCHA² for added security. To ensure customer privacy, all search

¹ A Secure Socket Layer (“SSL”) is a protocol for transmitting private documents via the internet. SSL uses a cryptographic system that uses two keys to encrypt data – a public key known to everyone and a private or secret key known only to the recipient of the message.

² CAPTCHA (“Completely Automated Public Turing test to tell Computers and Humans Apart”) is a type of challenge-response test used in computing to determine whether or not the user is human. This is used to protect against potentially malicious applications that run automated tasks that are both simple and structurally repetitive, at a much higher rate than

criteria and results will be stored in an encrypted format. To access the site, EGSs will be required to log in with a unique username that will be provided by Duquesne Light. The password will be created by the individual EGS and must be a minimum of six (6) characters long and include at least one letter and one number. EGSs seeking access to the website portal will be required to register with Duquesne Light three (3) days in advance. The login session will time-out after 10 minutes of inactivity and the EGS will be required to log in again. The login form will also require the EGS to accept Duquesne Light's terms and conditions/end user agreement and attest that the web application is being used at a public venue.

1. Website Portal Format

Below is a sample mock-up of website portal's login and customer search form. The mock up is illustrative only and may be modified in actual production.

EGS Login

Username: Password:

I attest that this web application is being used at a public venue

I agree to Duquesne Light Company's Terms & Conditions and End User Agreement



New image?

Sample CAPTCHA

Please enter the text from the image above

Login

would be possible for a human alone. This helps safeguard against the coordination and operation of an automated attack on networked computers.

Account Number Search

MAIN CUSTOMER

First Name:
Middle Initial: (opt.)
Last Name:
Photo ID Obtained:

PREMISE ADDRESS

House Number:
Street Name: Street Suffix:
Zip Code:
Employee Initials

I have received and will retain a signed LOA from the customer



[New image?](#)

Sample CAPTCHA

Please enter the text from the image above

As illustrated above, the website portal will require the EGS to provide in free-form text boxes the customer's full name (middle initial optional), service address including house number, street name, street suffix and zip code. Additionally, a selectable drop-down box will be included to choose the photo ID type obtained by the EGS. Photo ID types included in the drop-down box will likely include:

- Valid driver's license from the United States or Canada
- Valid learner's permit or temporary license (must include photograph)
- Valid United States or State-issued ID card
- Valid United States Military ID
- Valid United States or foreign passport
- Other

If the customer's identification type is not included in drop down box, the EGS will be required to write the type of identification received. The EGS will also be required to verify that it has obtained a signed LOA from the customer on the login form.

2. Account Number Search

As provided in the Commission's *Final Order*, Duquesne Light's website portal will be developed to provide one of three possible responses to a search request:

- a. The active account number (if an exact match is found),
- b. Error - Multiple accounts found, or
- c. Error - No match found.

An exact data match will be required to retrieve and display a customer account number.

3. Record Maintenance

Duquesne Light will maintain a record based on the unique username and password of who accessed the system, when the system was accessed, and what data was obtained at the time. All login attempts, successful and unsuccessful, will be logged, including but not limited to the EGS IP address and browser type. Additionally, all searches for customer data, successful and unsuccessful, will be logged, including but not limited to the EGS username, EGS IP address, transaction date and time, search criteria entered and search results returned. This information will be retained for three years and Duquesne Light will have the ability to provide it to regulators upon request.

III. COST RECOVERY

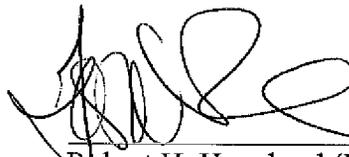
In the *Final Order*, the Commission directed EDCs to address cost issues associated with implementing a customer account number access mechanism for EGSs. Duquesne Light estimates that it will incur approximately \$50,000 in capital costs to implement its passcode protected secure website

portal as described herein. Duquesne Light intends to seek recovery of these costs in a future base rate proceeding.

IV. CONCLUSION

WHEREFORE, Duquesne Light Company requests that the Pennsylvania Public Utility Commission issue an Order approving the Company's customer account number access mechanism for EGSs as set forth herein.

Respectfully submitted,



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