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David T. Fisfis
Vice President, General Counsel & Corporate Secretary

June 30, 2016

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JUN 30 2016

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

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**Re: Petition of Duquesne Light Company for an Extension of Time and All Necessary
Waivers to Implement Its Phase II Off-Cycle Switching Solution
Docket No.P-2015-2491265**

**Duquesne Light Company Plan for Seamless Moves and Instant Connects
Docket No. M-2014-2401127**

Dear Secretary Chiavetta:

The purpose of this letter is to provide a status update with respect to the implementation of Duquesne Light Company's ("Company" or "Duquesne Light") Phase II off-cycle switching ("Phase II OCS") project. Additionally, herein the Company is providing an update regarding its seamless moves and instant connects implementation.

I. Phase II OCS

Presently, over ninety percent of Duquesne Light customers are able to switch electric generation suppliers ("EGS") once on-cycle and once off-cycle. On July 2, 2015, the Company filed the *Petition of Duquesne Light Company for an Extension of Time and All Necessary Waivers To Implement Its Phase II Off-Cycle Switching Solution* at the above referenced docket. By order dated August 20, 2015, the Commission granted Duquesne Light an extension of time to implement its Phase II OCS solution until September 1, 2016. The Phase II OCS solution will provide most Duquesne Light customers with multiple off-cycle switches.¹ The Company anticipates that it will be able to meet the mandated timeframe to implement Phase II OCS. To meet the delivery date of September 1, 2016, the Company has designed a solution with minor customizations that will enable it to meet the three-day switching requirements until the fully automated solution can be implemented. The Phase II OCS solution leverages the Company's existing OCS solution programming along with some manual processes in an attempt to

¹ The Company's CAP Shopping plan is currently subject to Commission review in connection with Duquesne Light's Default Service VIII plan, docket number P-2016-2543140.

minimize unnecessary complex system customizations until the OCS fully automated functionality is delivered in Oracle's base product. The Company will provide further status updates as required by the Commission's August 20, 2015 Order.

II. Seamless Moves and Instant Connects

On February 15, 2013, the Commission entered a Final Order in its *Investigation of Pennsylvania's Retail Electricity Market* ("RMI Order"), Docket No. M-2014-2401127. Therein, the Commission instructed electric distribution companies (EDCs) to submit plans by the end of 2013 for the implementation of seamless moves and instant connects in their service territories by June 1, 2015. Pursuant to the Commission's *RMI Order*, Duquesne Light submitted a compliance filing on December 31, 2013, which detailed the Company's plan to implement seamless moves and instant connects in its service territory by June 1, 2015.

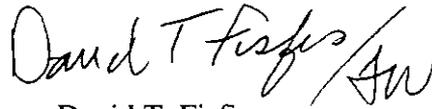
However, on April 3, 2014 the Commission promulgated new regulations directing EDCs to develop three-business day supplier switching timeframes. *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 57 Regulations Regarding Standards for Changing a Customer's Electricity Generation Supplier*, Docket L-2014-2409383 (Order Entered April 3, 2014). In its Order, the Commission acknowledged that the implementation of off-cycle switching required significant effort by the EDCs and that the timely development of off cycle switching was a priority over instant connects and seamless moves. Accordingly, the Commission issued a Secretarial Letter permitting EDCs to delay implementation of Seamless Moves and Instant Connects until July 1, 2016. *Secretarial Letter re: EDC plan filings for Seamless Moves and Instant Connects*. Docket No. M-2014-2401127 (March 20, 2015).

Duquesne Light has been diligently working to implement seamless moves and instant connects and Phase II OCS. Implementation of seamless moves and instant connects and Phase II OCS was a part of the Company's latest system upgrade to the Oracle system, Release 6.0. Release 6.0 included seamless moves and instant connects, Phase II OCS and upgrades to Meter Data Management (MDM) to enhance new Itron AMI meters interface and communication with Oracle systems. The targeted implementation date for these initiatives was June 27, 2016. The Company conducts extensive testing on the Oracle systems and interfaces prior to implementing changes. The MDM upgrades did not pass the final phase of testing. Accordingly, the Company delayed implementation of the release until the testing issues are resolved as to avoid the risk of losing communication with the AMI meters currently installed. Given that over 250,000 AMI customers could have been impacted if the Company moved forward with the June 27th implementation date, the Company believes it is reasonable and prudent to delay implementation for one month. The Company expects to complete all re-testing and go-live on or about August 1, 2016. The Company will provide the Commission with a further update regarding the status of seamless moves and instant connect implementation on or about August 1, 2016.

The Company informed EGS' of the new implementation date on June 28, 2016 during its bi-weekly EGS call. Duquesne Light is serving a copy of this letter on the Bureau of Investigation & Enforcement, the Office of Consumer Advocate, Retail Energy Supply Association, and the Office of Small Business Advocate.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink that reads "David T. Fisfis" followed by a stylized flourish or initials "SW".

David T. Fisfis

Enclosure

cc: Certificate of Service

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing 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).

VIA FIRST CLASS MAIL

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Office of Small Business Advocate
1102 Commerce Building
300 North Second Street
Harrisburg, PA 17101

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

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June 30, 2016



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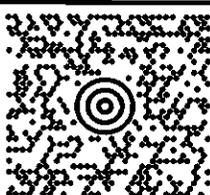
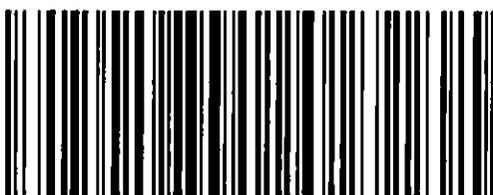
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