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October 21, 2014

VIA ELECTRONIC FILING

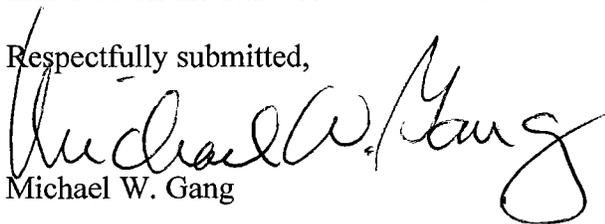
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of Duquesne Light Company for a Waiver of the Three Business Day
Switching Requirements Under 52 Pa. Code § 57.174
Docket No. P-2014-**

Dear Secretary Chiavetta:

Enclosed please find the Petition of Duquesne Light Company for a Waiver of the Three Business Day Switching Requirements Under 52 Pa. Code § 57.174. Copies will be provided as indicated on the attached Certificate of Service.

Respectfully submitted,



Michael W. Gang

MWG/skr
Enclosure

cc: Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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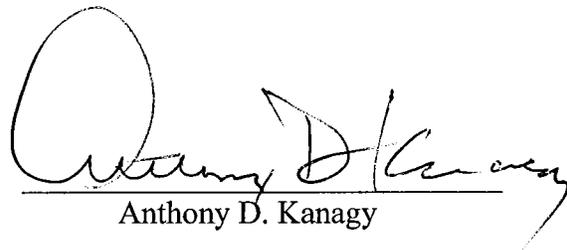
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Date: October 21, 2014



Anthony D. Kanagy

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company for a :
Waiver of the Three Business Day Switching : Docket No. P-2014-_____
Requirements Under 52 Pa. Code § 57.174 :

**PETITION OF DUQUESNE LIGHT COMPANY FOR A
WAIVER OF THE THREE BUSINESS DAY
SWITCHING REQUIREMENTS UNDER 52 PA. CODE § 57.174**

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.43 for a waiver of 52 Pa. Code § 57.174 and the Commission’s Final-Omitted Rulemaking Order in *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 57 Regulations Regarding Standards For Changing a Customer’s Electric Generation Supplier*, Docket No. L-2014-2409383, Order entered April 3, 2014 (“*Final-Omitted Rulemaking Order*”). A waiver is sought with regard to the requirement that electric distribution companies (“EDCs”) and electric generation suppliers (“EGSs”) implement processes by December 15, 2014 to switch customers to a new EGS or to default service within three business days of receipt of the electronic enrollment, and that multiple switches are to be permitted within a single billing period. The *Final-Omitted Rulemaking Order* further provides that EDCs and EGSs that are unable to comply with this timeframe may file a Petition with the Commission explaining why they are unable to comply and to propose alternatives, including an estimated timeframe for implementation.

Duquesne Light is unique among EDCs in Pennsylvania because it is currently in the process of replacing and implementing a new Customer Care & Billing (“CC&B”) System to modernize it and to enable smart meter technology. This CC&B System replacement is part of the Company’s FOCUS Project¹ (hereafter FOCUS Project or FOCUS System). The FOCUS Project impacts a significant and broad range of the Company’s utility operations, including customer billing and meter data management functions. The FOCUS System is scheduled to go live on November 28, 2014.

In order to implement the three business day switching requirements, Duquesne Light will be required to make substantial additional Information Technology (“IT”) modifications to its new FOCUS System after the go live date of November 28, 2014. While Duquesne Light is simultaneously programming and testing these modifications today, the Company will not be able to integrate the IT changes for off-cycle switching (“OCS”) into the FOCUS System until it is both live and stable. Therefore, there is a very limited time between November 28, 2014 and December 15, 2014, to integrate the three business day switching IT changes. However, Duquesne Light will attempt to make these modifications to its IT systems to permit the Company to substantially comply with the intent of the *Final-Omitted Rulemaking Order* by December 15, 2014, provided that the FOCUS System is operational and stable.

Given the significant risk and complexity of implementing the required IT modifications necessary to integrate the new OCS application 16 days after the FOCUS System is implemented, the Company is deploying a phased-in approach to implementation. The Company

¹ The FOCUS Project is a complex and multifaceted technology implementation that impacts virtually every aspect of Duquesne Light’s business and the service provided to customers. Although collectively coined the FOCUS Project, the project includes the upgrade, implementation and integration of several major systems such as the new CC&B system, a new Service Oriented Architecture, Meter Data Management system, Workforce Management system, Market Transaction Messages and Interactive Voice Response, among other things.

is unable to implement a full solution that meets the multiple off-cycle switch requirements of the regulations by December 15th as further explained below.

The Company will implement its OCS solution in two phases. The Phase 1 solution will initially provide for one off-cycle switch and one on-cycle switch per bill period for approximately 91% of its total customer base² (hereinafter, the “Phase 1 Solution”). The Company is making every reasonable effort to implement the Phase 1 Solution by December 15, 2014. The Phase 2 Solution will allow for multiple off-cycle switches (hereinafter, the “Phase 2 Solution”). With the implementation of the Phase 2 Solution, Duquesne Light anticipates that it should be fully compliant with 52 Pa. Code § 57.174 by July 31, 2015. For reasons explained herein, any unanticipated delays in the FOCUS Project cut-over or any instability after the FOCUS System is live will delay the Company’s ability to implement its Phase 1 Solution by December 15, 2014, and could delay implementation of full compliance by July 31, 2015. Duquesne Light cannot know for certain at this time that it will be able to implement the IT changes necessary for its Phase 1 Solution by December 15, 2014. Given the risk and significant complexity associated with the required IT modifications, Duquesne Light is also implementing back-up customer protections that will allow most customers to return to default service within 3 business days if, and only if, the Phase I Solution is unavoidably delayed, and the customer calls the Company to request a 3 day switch. Hereafter, the 3 business day switch to default service is referred to as the “Customer Protection Back-Up Solution.” The Customer Protection Back-Up Solution will allow most customers to avoid potential price spikes associated with variable rate contracts offered by EGSs, which is consistent with the purpose of the Commission *Final*

² The Phase I Solution will provide for one off-cycle switch and one on-cycle switch per bill period for 97% of its non-Customer Assistance Program (“CAP”) customers.

Omitted Rulemaking Order. In addition, shopping customers can then enroll with another EGS and may be able to move to their new EGS on the next billing cycle.

Finally, Duquesne Light also proposes to provide the Commission, statutory parties and intervenors status updates regarding the FOCUS Project and projected implementation date for the Phase 1 Solution beginning December 5, 2014.

Accordingly, Duquesne Light is requesting a waiver of the three business day switching requirements under 52 Pa. Code § 57.174 until January 16, 2015 to implement its Phase 1 Solution. Duquesne Light will attempt to implement its Phase 1 Solution by December 15, 2014 or as soon as reasonably possible thereafter. If Duquesne Light is not able to implement the Phase 1 Solution by January 16, 2015, it will request by January 7, 2015 an extension of the waiver request to implement its Phase 1 Solution so that the Commission can consider this request at its January 15, 2015 public meeting. Duquesne Light also requests a waiver of any and all regulations to allow the Company to implement its proposed Customer Protection Back-Up Solution if it is not able to implement the Phase 1 Solution by December 15, 2014. Finally, Duquesne Light further requests a more limited waiver of 52 Pa. Code § 57.174 to the extent of providing only one off-cycle switch per billing period from the time that its Phase 1 Solution is implemented to July 31, 2015, when it expects that it will be able to fully comply with the regulation.³

The Phase 1 Solution, Phase 2 Solution and Customer Protections Back-Up Solution are detailed more fully below.

³ If the Company determines that it cannot meet the July 31, 2015 date, it will file a supplemental waiver request.

II. BACKGROUND

1. Duquesne Light is a public utility as that term is defined under Section 102 of the Public Utility Code, 66 Pa.C.S. § 102, certified by the Commission to provide electric service in the City of Pittsburgh and in Allegheny and Beaver Counties in Pennsylvania. Duquesne Light is also an EDC and a default service provider as those terms are defined under Section 2803 of the Public Utility Code. 66 Pa.C.S. § 2803. Duquesne Light provides electric distribution service to approximately 590,000 customers.

2. Duquesne Light's attorneys are:

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Duquesne Light's attorneys are authorized to receive all notices and communications regarding this matter.

3. On April 3, 2014, the Commission issued its *Final-Omitted Rulemaking Order* to amend its existing Regulations at 52 Pa. Code, Chapter 57 to direct EDCs and EGSs to accelerate switching timeframes for retail electric customers to switch suppliers or to switch to and from default service in three business days.

4. The three business day switching requirement is set forth in Section 57.174 of the Commission regulations, which provides as follows:

(a) When a customer has provided the selected EGS or current EGS with oral confirmation or written authorization to select the new EGS or default service provider, consistent with the electric data transfer and exchange

standards, the EDC shall make the change within 3 business days of the receipt by the EDC of the electronic enrollment transaction.

(b) The EDC shall obtain a meter read to effectuate the switch of service within the time period provided in subsection (a). In instances when the EDC does not have advanced or automated metering capability, the EDC shall obtain an actual meter read, use an estimated meter read, or use a customer-provided meter read. When an estimated meter read is used, the estimated meter shall be updated when an actual meter read is obtained.

52 Pa. Code § 57.174.

5. In its *Final-Omitted Rulemaking Order*, the Commission also stated that multiple off-cycle switches are to be permitted within a single billing period. *Final-Omitted Rulemaking Order*, p. 27-28.

6. EDCs are required to implement the new accelerated switching requirements by December 15, 2014. *See* Secretarial Letter, Docket No. L-2014-2409383 (September 8, 2014).

7. However, recognizing that a considerable amount of time and resources may be needed to obtain full compliance, the Commission provided that any EDC or EGS unable to comply by December 15, 2014, may file a petition seeking a waiver that explains the inability to comply and provide proposed alternatives, including the estimated timeframe for implementation. *Final-Omitted Rulemaking Order*, p. 30.

8. Duquesne Light supports the Commission's goals of accelerating customer switching times. It is not possible for the Company to fully comply with the regulation by December 15, 2014 given the Company's ongoing efforts to implement its FOCUS Project, revise its bill print logic and incorporate changes to its business processes. However, the Company is proposing a plan to achieve the Commission's overall goals of accelerating switching times for customers, as further explained below.

III. EXPLANATION OF WAIVER REQUEST

A. SWITCHING PROPOSAL

9. The Company is not able to comply with the three business day switching regulations on December 15, 2014 primarily due to significant IT changes that are necessary to implement full OCS, including among other things, to revise the Company's bill print coding logic to enable two or more suppliers on the same bill along with changes in the business processes that are involved with customer switch activities.

10. Currently, the Company is installing a new CC&B System as a part of the FOCUS Project that is anticipated to go live on November 28, 2014. Any additional IT changes, including those necessary to complete three day switches, must be built as an integrated application in order to work with the FOCUS Project. The new OCS IT application go live schedule assumes the following:

- (i) The foundational billing platform is stable;
- (ii) The off-cycle switch add-on is stable; and
- (iii) The application modifications to satisfy OCS do not render the core billing system unstable.

11. However, the Company has developed and will attempt to implement IT and business processes necessary to allow one off-cycle switch and one on-cycle switch for approximately 91% of its customer base (97% of non-CAP customers) by December 15, 2014. The off-cycle switch would be during the billing period and the on-cycle switch would be effective with the customer's next on-cycle meter read. The FOCUS Project includes, among other changes, a complex replacement of the Company's billing system. At this time, the Company cannot be certain that it will be able to implement the IT systems necessary for the Phase 1 Solution between November 28, 2014 and December 15, 2014 because it cannot be

certain that the FOCUS System will be sufficiently stable after cut-over to do so,⁴ or that the OCS IT application will be stable, or that integrating the OCS IT application to the FOCUS System will not interfere with the stability of the FOCUS System. Therefore, as explained herein, Duquesne Light is requesting a waiver to implement its Phase 1 Solution until January 16, 2015. Duquesne Light has also proposed a Customer Protections Back-Up Solution which is described below in the event that the Company is not able to implement the Phase 1 Solution by December 15, 2014.

12. A diagram showing a typical off-cycle switch from default service to an EGS under the Phase 1 Solution is provided as Appendix A. As reflected on Appendix A, after a request is received, an enrollment letter will be sent to the customer on day 1 (the first business day after the enrollment is received). The enrollment is completed on day 3 (the third business day) after the enrollment is received and billing with the EGS begins on day 4. The customer will receive a single bill for the month, with default service charges for the time period that the customer was on default service and EGS charges for the time period that the customer was taking service from the EGS. Appendix A also includes a glossary of acronyms used in Appendices A – C.

13. A diagram showing a request for multiple switches in the same billing cycle under the Phase 1 Solution is provided as Appendix B. As explained therein, the customer will be switched under the same process described in Appendix A for the initial switch. For the second switch in the billing cycle, the customer will remain with EGS(A) until the end of the billing cycle and be switched on-cycle at the end of the billing cycle to EGS(B).

⁴ The FOCUS System has been tested extensively in a quality assurance environment with the appropriate data sets. Instability can be created by an unanticipated or unforeseen event or circumstance when the system is put into production.

14. If a customer initially requests that their service be switched to EGS(A) and then during the three-day switching period the customer requests service be switched to EGS(B), Duquesne Light will drop the request to switch the customer to EGS(A). A new three-day period will begin with the customer's request to be switched to EGS(B). See Appendix C for a diagram of how the Company will process this type of request under the Phase 1 Solution.

15. A request made within the last 3 business days before the end of the billing cycle will be processed as an off-cycle switch in the next billing period.

16. During the Phase 1 Solution, Duquesne Light will be able to accommodate one off-cycle and one on-cycle switch per month for 91% of its customer base (97% of non-CAP customers). Duquesne Light will not be able to accommodate OCS for CAP customers, certain Hourly Priced Service customers,⁵ unmetered customers, net-metering customers, space heating customers on Rider No. 13 and customers that receive summary bills.

17. Duquesne Light has approximately 35,000 CAP customers. At this time, CAP customer benefits are not portable. Duquesne Light has filed a proposal to make CAP customer benefits portable at Docket No. M-2013-2350946 that is pending Commission approval. Accordingly, there is currently no switching by CAP customers. The Company will develop a plan for 3 day switching of CAP customers after CAP portability is implemented.

18. In addition, the Company's Hourly Priced Service customers, unmetered customers, net metering customers, space heating customers on Rider No. 13 and summary bill customers⁶ (hereinafter referred to as "non-CAP Phase 1 excluded customers") receive complex

⁵ During the Phase 1 Solution, Duquesne Light's IT systems will not be able to make an off-cycle switch for Hourly Priced Service customers unless they have been shopping for four consecutive billing periods due to bill printing constraints.

⁶ Summary bill customers receive service at many different meter points in the Company's service territory and receive one summary bill for all meter points. If a summary bill customer elects to

bills that would require extensive programming changes to accommodate OCS. It is unlikely that the Company will be able to make the necessary IT and billing changes for these customers (approximately 17,800 customers) prior to July 31, 2015 because these customer groups have complex bills (i.e., involving PJM reconciliation for hourly customers and multiple suppliers under different contracts for summary bills).

19. The Company will be able to reduce the switching time for on-cycle switches for non-CAP Phase 1 excluded customers. If a request to switch is made at least four business days before the end of the billing cycle, the customer will be able to receive service from the new supplier at the beginning of the next billing cycle.

20. Duquesne Light currently anticipates that it should be able to fully comply with the three business day switching regulations for all customers by July 31, 2015.

21. Duquesne Light's ability to implement the Phase 1 Solution on December 15, 2014, and the Phase 2 Solution by July 31, 2015, depends upon the effective implementation of the FOCUS Project by November 28, 2014, the FOCUS System being stable after cut-over and the Company being able to successfully integrate the IT changes necessary to implement the Phase 1 Solution with the FOCUS Project billing platform without creating instability. The Phase 1 and Phase 2 Solutions are being built to be integrated with new billing system platform. If the FOCUS Project go-live date must be delayed or the FOCUS Project is unstable and cannot support the additional coding that implements OCS, the Phase 1 and Phase 2 three business day switching Solutions will also require delay. (See Paragraphs 10-11 above.)

22. Duquesne Light also has developed a Customer Protections Back-Up Solution in the event that it is not able to implement the Phase 1 Solution on December 15, 2014.

receive individual bills, the Company would accommodate that request which would allow individual accounts to be included in the Phase 1 Solution.

23. If the Phase 1 Solution is delayed, Duquesne Light will be able to switch shopping customers, except for Phase 1 excluded customers, to default service within approximately three business days provided that the customer calls Duquesne Light to initiate the switch. The Company will also advise the customer that it can switch to a new EGS by having the new EGS submit the request and that such request will become effective at the customer's next billing cycle if the EGS submits the EDI transaction at least four business days prior to the next billing cycle. Additionally, the Company will reduce the time needed to process an on-cycle switch for all customers during this period which will allow a customer to switch to an EGS on their next billing cycle faster and with less lead time.

24. When the Company receives a call from the customer, the customer will be advised that he/she can be switched to default service within approximately 3 business days, that the customer can be switched to default service and then be switched again to a new EGS with the next billing cycle or that the customer may simply wait for the switch to the new EGS with the next billing cycle.⁷

25. If the customer requests to be switched to default service off-cycle, the customer service representative will manually override the billing system to treat the switch as a final bill. The customer will be switched to default service within three business days and may receive two bills for the billing period.⁸ The customer will be able to elect service with an EGS, on-cycle, for the next billing period by having the new EGS notify Duquesne Light at least four business days prior to the next billing cycle.

⁷ The option of waiting until the next billing cycle may prevent the customer from paying cancellation fees. Duquesne Light will advise customers of this in compliance with Commission regulations.

⁸ In addition, the customer's billing period may be less than 26 days for the final bill or more than 35 days in the billing period following the final bill.

26. By implementing this process, shopping customers will have some protections against potential price spikes under variable rate EGS contracts by allowing them to return to default service within three business days.

27. Duquesne Light notes that if a customer calls an EGS about a variable rate contract issue, Duquesne Light's billing system would allow the EGS to provide the customer a fixed rate and avoid the need to switch back to default service as of their next billing cycle.

28. If Duquesne Light determines that it must implement the Customer Protections Back-Up Solution, it will educate customers and EGSs about the process in several different ways. First, Duquesne Light will publish notice of this solution advising customers to contact Duquesne Light if they have issues with a variable rate contract and need to make a switch in using different communications mediums in the Company's service territory. Duquesne Light will also publish this notice in newspapers during the week prior to December 15, 2014. Duquesne Light will include information regarding the Customer Protections Back-Up Solution on its web-site, IVR and on social media. In addition, Duquesne Light will hold a meeting with EGSs to discuss the process.

29. As explained above, Duquesne Light proposes to provide the Commission, statutory parties and intervenors with status updates regarding the FOCUS Project and implementation of the Phase 1 Solution beginning December 5, 2014.

30. Attachment D includes proposed Tariff Sheets incorporating revisions necessary to implement the proposed Phase 1 Solution. Duquesne Light requests Commission approval to file these pro forma tariff sheets on one-day's notice following Commission approval of this Petition. The Company will file the tariff sheets when it is able to implement the Phase 1 Solution.

31. Duquesne Light will also file proposed Tariff Sheets with the Commission that would be necessary if Duquesne Light is required to implement the Customer Protections Back-Up Solution. Duquesne Light anticipates filing these proposed Customer Protections Back-Up Solution Tariff Sheets by November 7, 2014. When it files the Customer Protections Back-Up Solution Tariff Sheets, Duquesne Light will ask that it be permitted to file these tariff sheets on one day's notice if it is required to implement this solution.

B. REQUEST FOR WAIVER

32. As noted above, the Commission stated in the *Final-Omitted Rulemaking Order* that EDCs and EGSs could request a waiver of the three business day switching regulations if they were unable to meet the timeframe for implementation. The Commission further stated that a Petition must explain why the EDC or EGS cannot comply and include an estimated timeframe for implementation.⁹

33. Duquesne Light respectfully requests a waiver of 52 Pa. Code § 57.174 to allow the Company to implement its Phase 1 Solution by January 16, 2015, and to provide the Phase 1 Solution through July 31, 2015. As explained herein, Duquesne Light will attempt to implement the Phase 1 Solution on December 15, 2014, or as soon as reasonably possible thereafter. Duquesne Light also requests a waiver of the three business day switching rule and any other waiver of regulations necessary to allow the Company to implement its proposed Customer Protections if it is not able to implement the Phase 1 Solution by December 15, 2014. As further

⁹ Section 5.43 of the Commission's regulations permits a party to petition the Commission for a waiver of a regulation. The petition must clearly and concisely provide the purpose of and the facts claimed to constitute the grounds for requiring a waiver. 52 Pa. Code § 5.43(a). The Commission also has explained that it has the authority to waive its regulations when it is necessary and in the public interest. *Petition of Direct Energy Services, LLC for Emergency Order Approving a Retail Aggregation Bidding Program for Customers of Pike County Light & Power Company*, Docket No. P-00062205, 2006 Pa. PUC LEXIS 3, 249 P.U.R.4th 327 (April 20, 2006); *Petition of ALLTEL Pennsylvania, Inc. for Declaratory Order*, Docket Nos. P-00950955, *et al.* (June 10, 1996).

explained above, Duquesne Light will provide the Commission and interested parties with updates regarding the status of the FOCUS Project and the Phase 1 Solution beginning December 5, 2014. In the event that the Company is not able to implement the Phase 1 Solution by January 16, 2015, it will request a further extension to implement its Phase 1 Solution by January 7, 2015.

34. As explained above, implementing the three business day switching requirement will require extensive IT changes related to the Company's bill print functions and business processes. Under the Phase 1 Solution, the Company anticipates that it will be able to make IT changes necessary to accommodate one off-cycle and one on-cycle switch per month for 91% of its customers (97% of non-CAP customers).¹⁰

35. Duquesne Light expects to be able to implement the Phase 2 Solution by July 31, 2015. The Company anticipates that the Phase 2 Solution will be fully compliant with 52 Pa. Code § 57.174. Under the Phase 2 solution, all customers eligible to shop will be able to make multiple off-cycle three business day switches per billing period.

36. In the *Final-Omitted Rulemaking Order*, the Commission stated that it was adopting the three business day switching rules "in order to ensure that consumers may easily and quickly switch electric suppliers in an effort to mitigate potential adverse price impacts related to variable contracts and fluctuations in the wholesale and retail energy markets." *Final-Omitted Rulemaking Order*, p. 3.

¹⁰ Duquesne Light investigated the possibility of full compliance by December 15, 2014 through the issuance of a new bill for every customer switch. If this methodology were adopted, customers that switched off-cycle would receive multiple bills per month. However, Duquesne Light's IT system would not be able to accommodate three-day switching by December 15, 2014 using this methodology. Moreover, adopting Duquesne Light's Phase 1 Solution will permit the Company to create the IT framework for the Phase 2 Solution that is anticipated to become effective by July 31, 2015.

37. The Phase 1 Solution will allow approximately 97% of the Company's non-CAP customers to have one off-cycle switch and one on-cycle switch per month. This will allow customers to quickly mitigate adverse price impacts related to variable contracts and price fluctuations in the wholesale and retail energy markets.

38. In addition, the Phase 1 Solution is a temporary proposal that is estimated to be replaced with the Phase 2 Solution by July 31, 2015, which should fully comply with the three business day switching regulations and allow multiple three business day switches per billing period for all customers.

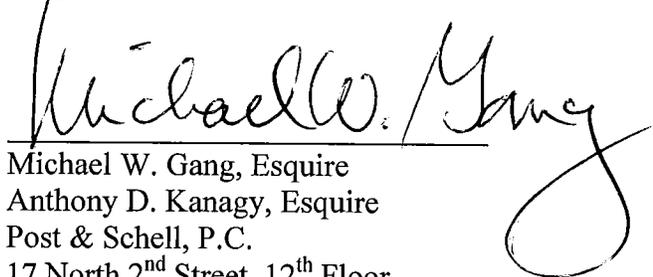
39. Duquesne Light's Phase 1 Solution is a reasonable approach that substantially meets the intent of the *Final-Omitted Rulemaking Order*, especially considering that the Company is installing a new CC&B System that is estimated to go live on November 28, 2014.

40. Finally, Duquesne Light's Consumer Protections Back-Up Solution is also a reasonable approach as it provides a process that will allow customers to exit an unfavorable supply contract and return to default service pending a short delay in switching service to a new EGS.

IV. CONCLUSION

WHEREFORE, for the foregoing reasons, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission grant the Company a waiver of the requirements of 52 Pa. Code § 57.174 and approve the Company's Phase 1 Solution three business day switching proposal as explained herein, approve and grant any and all waivers with respect to the Customer Protections Back-Up Solution in the event that the Company is not able to implement the Phase 1 Solution by December 15, 2014, and authorize the Company to file the pro forma tariff supplements contained in Appendix D, including those tariff supplements to be filed with respect to the Customer Protections Back-Up Solution, each to become effective on one-day's notice when it is able to implement the Phase 1 Solution or, in the case of the Customer Protections Back-Up Solution, if the same is in effect on December 15, 2014.

Respectfully submitted,



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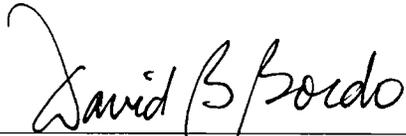
Date: October 21, 2014

Attorneys for Duquesne Light Company

VERIFICATION

I, David B. Bordo, Vice President – Strategy & External Affairs at Duquesne Light Company, hereby state that the facts above set forth in the Petition of Duquesne Light Company for a Temporary, Limited Waiver of the Three Business Day Switching Requirements Under 52 Pa. Code § 57.174 are true and correct to the best of my knowledge, information and belief and that I expect that Duquesne Light Company will be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: 10/21/14



David B. Bordo

Appendix A

Glossary of Terms

DA - Day ahead

CP - Contribution to Peak (Load)

MDM - Meter Data Management

MTM - Market Transaction Management

FA - Field Activity

SA - Service Agreement

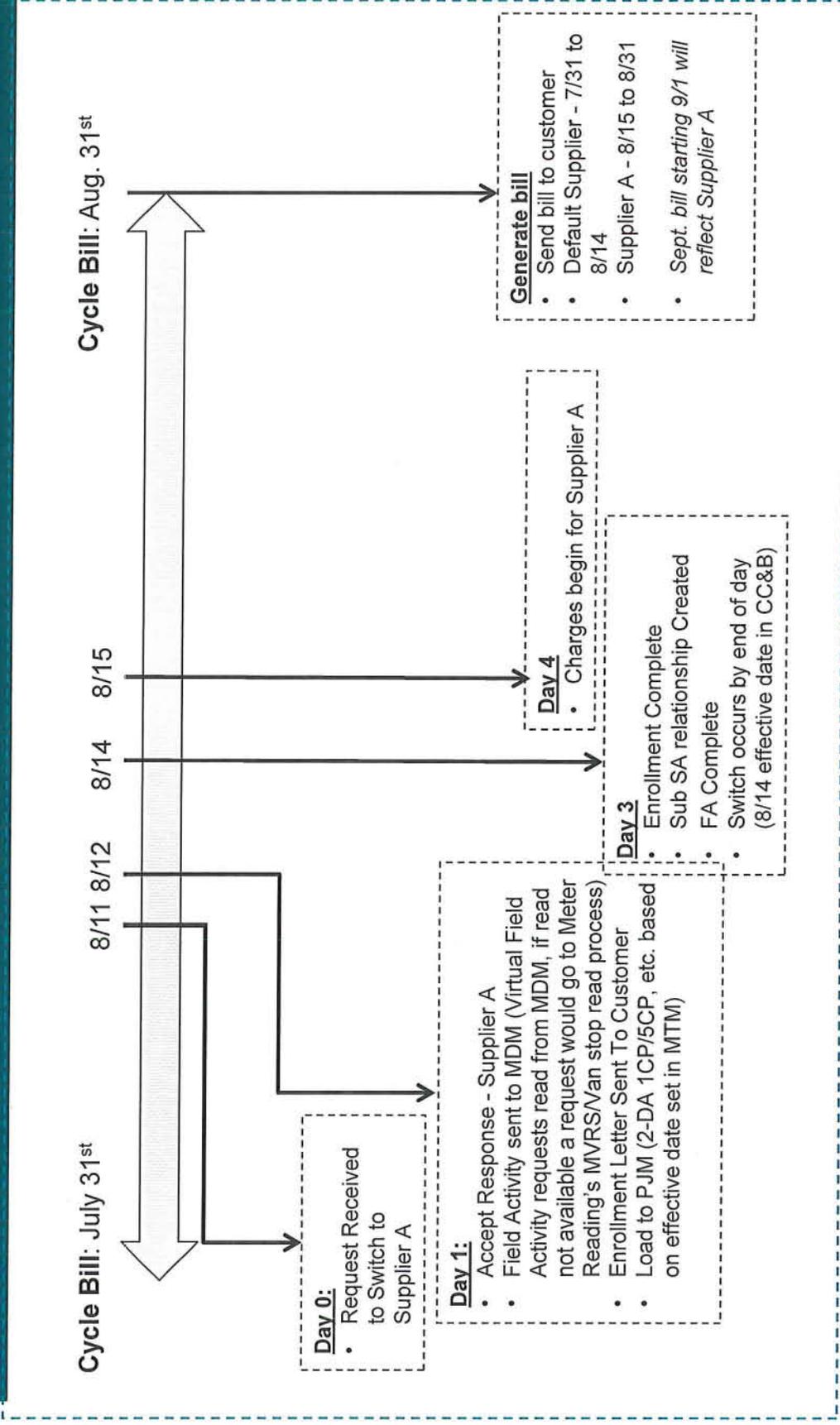
CC&B - Customer Care & Billing (billing system)

MVRS - Multi Vendor Reading System

Appendix A

Scenario 1: Off Cycle Switch – Requested mid-cycle

Default Supplier to EGS (A)



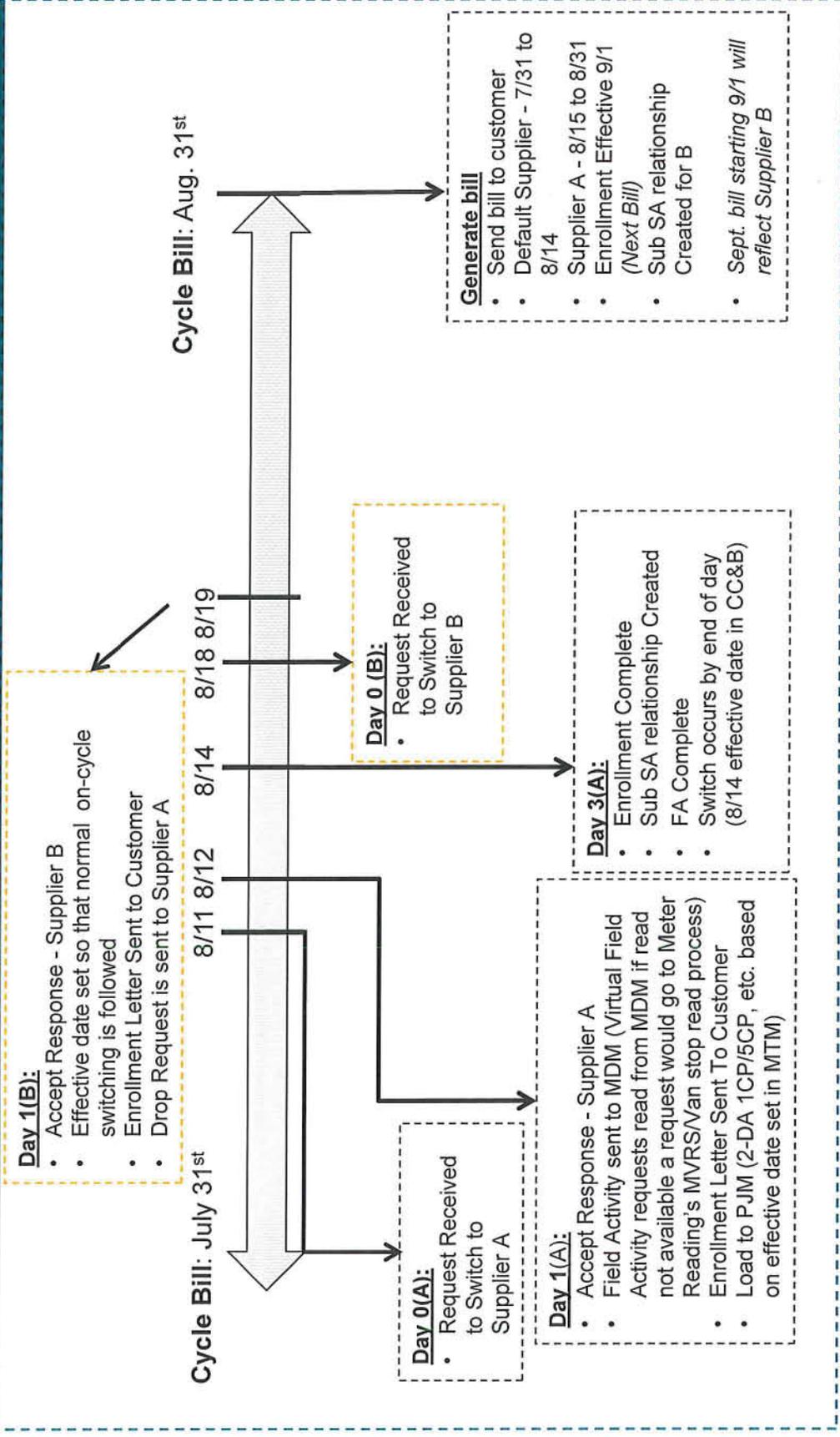
Appendix B

Appendix B

Scenario 2: Off Cycle Switch – Multiple Request (No Request Pending)



Default Supplier to EGS (A) then EGS (B)



Appendix C

Appendix C

Scenario 3 : Off Cycle Switch – Request Pending

