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File #: 160549

February 27, 2015

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-2014-2448863**

Dear Secretary Chiavetta:

By Order entered February 6, 2015, the Pennsylvania Public Utility Commission (“Commission”) denied Duquesne Light Company’s (“Duquesne Light” or the “Company”) Petition for Reconsideration/Rehearing of the Commission’s Order Entered December 4, 2014 in the above-referenced proceeding. In the February 6, 2015 Order, the Commission also directed Duquesne Light to file a status update regarding the implementation of its Phase I Solution by February 28, 2015. As explained below, the Company currently is targeting, but cannot guarantee, the Phase I Solution to be implemented on March 7, 2015 so it is live when the Company opens for business on March 9, 2015.

The Company has been conducting extensive testing on its off-cycle switching (“OCS”) Phase I Solution. The Company originally planned to perform two phases of regression testing, which is the final testing stage. The Company began its second phase of regression testing on February 22, 2015, and has identified a number of defects to date, six of which were critical defects. These critical defects must be addressed in order to implement the Phase I Solution. To provide some additional information about what some of these critical defects involve, three of the defects would send incorrect usage information to the third-party supplier through EDI transactions, and one of the defects would prevent the Company from issuing reconciliation bills to large hourly priced service customers. The Company is working to correct these defects as quickly as possible, as well as to provide a manual workaround for certain other defects that are less critical, but still require workarounds before the OCS Phase 1 Solution is implemented.

ALLENTOWN HARRISBURG LANCASTER PHILADELPHIA PITTSBURGH PRINCETON WASHINGTON, D.C.

A PENNSYLVANIA PROFESSIONAL CORPORATION

Rosemary Chiavetta, Secretary

February 27, 2015

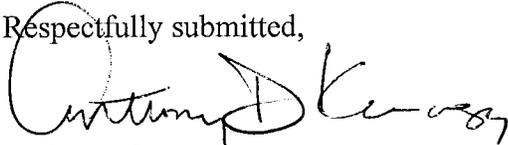
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Once the defects that must be corrected are fixed, the Company will begin a third round of regression testing to ensure that the code changes function as designed and that the introduction of the new code did not cause other existing code to break or fail to function as designed. Because of the level of defects found in the second phase of testing, our recent experience with FOCUS and from a prudency standpoint, the Company has little alternative but to perform at least a third round of regression testing before the OCS Phase 1 Solution is implemented.

In addition, the OCS Phase I solution deployment takes at least 15 hours to implement and can only be introduced on a Saturday so as to not impact batch billing. Therefore, the Company is targeting March 7, 2015 to begin installation of the Phase I Solution with a go-live date scheduled for March 9, 2015. Unfortunately, the Company cannot guarantee that the Phase I Solution will go-live on March 9, 2015, but is targeting this date. A go-live decision continues to be dependent on the resolution of existing defects and whether any additional defects are found during the testing scheduled for the week beginning March 2, 2015 and the impacts of those defects on customers and suppliers.

The Company plans to informally advise the Office of Competitive Market Oversight and the parties in this proceeding of the Company's status regarding its Phase I Solution going forward.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Anthony D. Kanagy". The signature is written in a cursive style with a large initial "A".

Anthony D. Kanagy

ADK/skr

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).

VIA E-MAIL AND FIRST CLASS MAIL:

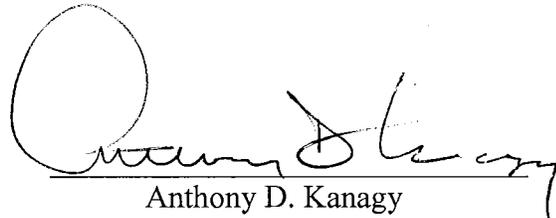
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Date: February 27, 2015



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