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August 15, 2018

**BY HAND DELIVERY**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

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2018 AUG 15 PM 12:25  
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In re: Focused Management and Operations Audit of Pike County Light & Power Company and Leatherstocking Gas Company LLC; Docket Nos. D-2017-2584891 & D-2017-2584892; **PIKE COUNTY LIGHT & POWER COMPANY'S FIFTH MONTHLY STATUS REPORT ON IMPLEMENTATION OF ELECTRONIC DATA INTERCHANGE**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is Pike County Light & Power Company's Fifth Monthly Status Report on Implementation of Electronic Data Interchange in the above-captioned matter. A copy of this filing has been served in accordance with the attached Certificate of Service.

If you have any questions regarding this filing, please do not hesitate to contact me.

Very truly yours,

Thomas J. Sniscak  
Whitney E. Snyder

WES/das  
Enclosure

cc: Russel S. Miller  
Steven L. Grandinali  
Dan Mumford, Office of Competitive Market Oversight  
Kriss Brown, Law Bureau



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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUC  
SECRETARY'S BUREAU  
Focused Management and Operations :  
Audit of Pike County Light & Power : Docket Nos. D-2017-2584891  
Company and Leatherstocking Gas : D-2017-2584892  
Company LLC :

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**PIKE COUNTY LIGHT & POWER COMPANY'S FIFTH MONTHLY STATUS  
REPORT ON IMPLEMENTATION OF ELECTRONIC DATA INTERCHANGE**

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Pursuant to the Commission's March 15, 2018 Order<sup>1</sup> in this proceeding, Pike County Light & Power Company (Pike) submits this status report regarding implementation of Electronic Data Interchange (EDI) capability.

In Pike's previous reports, it has documented the steps taken to analyze what Pike would need to do to implement EDI. After several months of review of the file formats required under Pennsylvania's EDI Rules and the interfaces that would need to be constructed to allow Pike's current customer information system to work with EGS systems, Pike has concluded that the cost likely outweighs the benefits.

Pike's Customer Information Service (CIS) vendor estimates that multiple EDI integrators, a minimum of approximately 30 different interfaces, would need to be created by our CIS vendor. Exclusive of integrator cost, the minimum cost to implement a solution to allow for the EDI integration is estimated to be between \$240,000 USD with the potential of being as high as \$450,000 USD. This does not include any development work that may be needed at the moment.

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<sup>1</sup> *Focused Management and Operations Audit of Pike County Light and Power Company and Leatherstocking Gas Company, LLC, Docket No. D-2017-2584891 et al. (Order entered March 15, 2018).*



Pike currently has 2,215 EGS customers, approximately 47% of the total customer base. From September 27, 2017 when Pike's CIS went live through July 31, 2018, the company received 123 customer add/drop or rate change files from EGSs on its system. This works out to 1 transaction every 2.5 days. Currently, two CIS personnel at Pike and one energy supply specialist at Corning Natural Gas Company (Pike's affiliate) process these files. The data below shows the number of such transactions per month for the last quarter.

Period	Drops/Maint files	Days	Frequency days per transactions
* 17-Sep	0	3	0.00
17-Oct	10	31	3.10
17-Nov	5	30	6.00
17-Dec	20	31	1.55
18-Jan	2	31	15.50
18-Feb	5	28	5.60
18-Mar	10	31	3.10
18-Apr	6	30	5.00
18-May	45	31	0.69
18-Jun	9	30	3.33
18-Jul	11	31	2.82
	123	307	2.50

Note: PCLP CIS went live September 27, 2017

The company has been informed by its CIS vendor that it would need to spend between \$240,000 to \$450,000 to modify its existing CIS software to work with EDI. Beyond the initial CIS vendor programming cost identified the company would incur annual fees from EGS integrator of \$35,000 to \$40,000. The company believes it would be more cost effective to hire



another customer service employee with the primary job responsibility of updating CIS information with EGS customer changes. Additionally, the company and its CIS vendor believe they can develop a more cost effective hybrid approach that minimizes data entry errors while remaining economical. Given the limited number of EGS transactions to date this seems to be a more prudent course of action. Pike will file a more detailed cost-benefit analysis in September.

Respectfully submitted,



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*Counsel for Pike County Light & Power Company*

Dated: August 15, 2018

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## VERIFICATION

I, Russel Miller, certify that I am Vice President-Energy Supply & Business Development for Pike County Light and Power, and that in this capacity I am authorized to, and do make this Verification on their behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief, and Pike County Light and Power, expects to be able to prove the same at any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.



Russel Miller  
Vice-President Energy Supply & Business  
Development, Pike County Light and Power  
Company

DATED: 08/15/2018

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**BY FIRST CLASS MAIL**

Bureau of Audits  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 3<sup>rd</sup> Floor East  
Harrisburg, PA 17120

Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 3<sup>rd</sup> Floor West  
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*Attorneys for  
Pike County Light & Power Company*

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