

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

DATE: November 2, 1998

KJR

SUBJECT: Hagler Bailly's Report on "Review of Potential Impediments to Pennsylvania Power & Light's Implementation of Competitive Metering and Billing on January 1, 1999" (re: Docket No. R-00973954)

TO: Chairman John M. Quain
Vice Chairman Robert K. Bloom
Commissioner David W. Rolka
Commissioner Nora Mead Brownell
Commissioner Aaron Wilson, Jr.
All Joint Petitioners

FROM: Glenn W. Bartron *(GWB) for GWB*
Director
Bureau of Audits

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On August 13, 1998, at Docket R-00973954, the Commission tentatively approved the Joint Petition for Full Settlement of PP&L Inc.'s Restructuring Plan and Related Court Proceedings. Paragraph H.7 of this Joint Petition, which received final approval on August 27, 1998, required that the Bureau of Audits (working with a third party consultant) examine those constraints which cannot reasonably overcome in time to implement competitive metering and/or billing by January 1, 1999 and, if constraints are identified, provide a recommendation as to when those constraints can be eliminated. The review was to be completed no later than October 31, 1998 with a report submitted to the Commission and provided to the Joint Petitioners.

Hagler Bailly, the consultant retained for the review, has completed its work and issued the attached report. This completes the Bureau's responsibilities at Paragraph H.7 of the Joint Petition. Please contact Tom Sheets at (717)772-0311 or me at (717)783-5000 if you have any questions.

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**REVIEW OF POTENTIAL IMPEDIMENTS TO
PENNSYLVANIA POWER & LIGHT'S
IMPLEMENTATION OF COMPETITIVE
METERING AND BILLING ON
JANUARY 1, 1999**

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Prepared for:

The Pennsylvania Public Utility Commission
Commonwealth of Pennsylvania

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October 28, 1998

EXECUTIVE SUMMARY

Hagler Bailly has completed its review of Pennsylvania Power and Light's ability to provide competitive metering and/or billing on January 1, 1999. This report describes the constraints to providing competitive metering and/or billing and offers recommendations on when these constraints can be eliminated.

Pennsylvania Power and Light (PP&L) is currently in the process of replacing its legacy Customer Information System (CIS) with one that will provide year 2000 compliance and functionality required in a competitive environment. The project began in late 1996 and system conversion is set for January 30, 1999. Throughout the system development project, there have been several expansions in scope as the details of Pennsylvania's retail competition initiatives have become available. PP&L has managed the project's scope to meet its designated time frame for conversion. The system development project is currently in the final testing phase for the January conversion. After system conversion, PP&L expects three to six months of system and business process instability. PP&L believes stability should be achieved prior to adding significant new functionality to support competitive metering and/or billing.

The systems effort to support retail competition, including competitive metering and/or billing, is enormous. Additionally, the Pennsylvania Public Utility Commission (PUC) sanctioned working group that is defining the systems standards is behind schedule. Hence, it will be difficult for all utilities, including PP&L, to implement the necessary electronic data interchange transactions for competitive metering and/or billing by January 1, 1999. This is exacerbated by the fact that only some of the utilities in Pennsylvania have approved restructuring settlements, which define company specific requirements. Further, definitions of what is meant by "competitive metering and/or billing" vary among the industry players.

After reviewing pertinent documentation and interviewing PP&L and Petitioner personnel, Hagler Bailly's major recommendations regarding when PP&L can implement the necessary transactions for competitive metering and/or billing are as follows:

- PP&L should implement the 814 Historical Usage Request and 867 Historical Usage transactions on their new system by March 15, 1999.
- PP&L should implement the EGS consolidated billing transactions by June 30, 1999, or three months after PUC approval of the necessary transactions, whichever is later.
- PP&L should implement the unbundled metering transactions by August 31, 1999, or five months after PUC approval of the necessary transactions, whichever is later.

BACKGROUND

In September of 1996, Governor Tom Ridge of the Commonwealth of Pennsylvania ordered a plan for retail competition to be developed by end of the year. On December 3, 1996, he signed an electricity competition law, *Electricity Generation Customer Choice and Competition*, calling for retail competition to be phased in from January 1, 1999 through January 1, 2001. Rates for electric customers were frozen on January 1, 1997. Pennsylvania's law called for retail pilots for 5 percent of each utility's load to begin in 1997, and utilities were required to file detailed restructuring plans with the Pennsylvania Public Utility Commission by September 30, 1997.

Pennsylvania Power and Light filed its restructuring plan with the PUC on April 1, 1997 and received approval of a settlement on August 13, 1998. This settlement called for the introduction of competitive billing and metering on January 1, 1999. Since PP&L's technical ability to introduce these competitive market capabilities by January 1999 was uncertain, the settlement agreement called for an independent review of "any constraints raised by PP&L that may prevent implementation of competitive metering and/or billing on January 1, 1999." This review, to be carried out under the auspices of the PUC's Bureau of Audits, was specifically to "examine those constraints which cannot reasonably be overcome in time to implement competitive metering and/or billing by January 1, 1999 and, if constraints are identified, will provide a recommendation as to when those constraints can be eliminated."

This report is the culmination of the review. It has been prepared by Hagler Bailly, under the direction of the Bureau of Audits. The findings, conclusions and recommendations of the review are detailed in this report.

FINDINGS

Decision to Replace Legacy System

1. **Efforts to replace PP&L's legacy Customer Information System began in late 1993 when a project to develop a custom solution was initiated. This project was terminated in mid-1995 for business reasons unrelated to the project. In late 1996, pressure to solve Year 2000 non-compliance and the need for a system that could operate in a competitive environment resulted in the current package-based CIS replacement project.**

The legacy CIS, known as "Access", is a "homegrown" mainframe system that is over 35 years old. It is highly interfaced with approximately 40 other systems within PP&L. In September, 1996, PP&L decided to replace the system with a package-based solution. The primary drivers of the decision to replace the system were as follows:

- It was not year 2000 compliant.
 - It was very inflexible, requiring inordinate programming and testing time for changes.
 - It could not support the required functionality of a more competitive environment.
2. **PP&L selected Andersen Consulting and its Customer One solution. The Customer One system is a pre-designed system that PP&L believed could be implemented in the shortest reasonable time frame. Because the Customer One solution had been implemented many times previously, PP&L believed it to be the least risky approach.**

Based upon prior unsuccessful attempts to develop a custom-designed system, PP&L decided to seek a partner that could provide a pre-designed system capable of handling in excess of one million customers. They selected Andersen Consulting and its Customer One solution -- a client server, HP Unix/Oracle system (PP&L is the first company using the Unix/Oracle format). With approximately 24 Customer One installations in the United States and Europe, PP&L became one of four utilities known as "T5" (version 5) clients, meaning these companies were modifying

the pre-designed "T4" (version 4) Customer One system to meet their specific needs. The T4 Customer One system supports 167 business tasks and PP&L attempted to use as many of these pre-designed capabilities as possible to decrease the transition time to the new system. PP&L accepted changes to the T4 Customer One system only under two conditions: 1.) if the T4 system's functionality did not support the current regulatory environment, or 2.) if the T4 system's functionality did not provide a critical capability. PP&L uses the name Customer Service System (CSS) to describe its Customer One system and the name Customer Link 2000 (CL2000) when referring to the project to implement its new system.

CL2000 Project Status

3. The CL2000 project management team has managed its scope to meet evolving requirements within its designated time frame.

The CL2000 project was initiated in October, 1996 and had a projected implementation date in January, 1999. A fit assessment between the T4 Customer One system and PP&L requirements was conducted from January until August in 1997. During this time period, there was an expansion of scope to develop the requirements in CSS necessary for PP&L to support Pennsylvania's Customer Choice pilot. And, in March, 1997, the implementation date for the new system was accelerated to November, 1998 from January, 1999, in order to diffuse any issues that could result from implementing a new CIS system at the same time as statewide implementation of retail competition.

The CL2000 project implementation scope defined in August, 1997 was based upon the fit assessment and included the addition of functionality to support Pennsylvania's Customer Choice pilot. This scope required 28,487 staff days to complete and had an implementation date of November 30, 1998. Attachment One details the CL2000 scope, staffing days and schedule as of August, 1997.

The scope was expanded again in May, 1998 to allow CL2000 to:

- provide functionality to support Energy Plus requirements;
- duplicate changes that were being made in the legacy system to support the requirements necessary for retail competition beginning in late in 1998;
- and, accommodate a decision to switch billing capabilities from "rate ready" to "bill ready," per the PECO settlement.

This scope expansion resulted in no schedule slippage. Total staff days required to complete this expanded scope were 5,139. See Attachment 2 for more detail.

The requirements to support the business processes in EnergyPlus were divided into two categories: "Day 1 Requirements" which would be delivered upon implementation of the CSS (November 30, 1998) and "Subsequent Requirements" which would be prioritized and delivered in subsequent releases, the first of which was scheduled for the June, 1999 time frame.

The functionality included in this scope expansion to meet competitive requirements were:

- The capability to provide the enrollment volunteering and selection processing transactions;
- And, the ability to provide "bill ready" billing, as opposed to "rate ready" billing.

The PUC ordered that the enrollment volunteering and selection processing transactions be made available by Electric Distribution Companies (EDCs) in late 1998. These transactions are currently being installed in PP&L's legacy system to meet this order. This same functionality had to be duplicated in the CSS and will be available upon system conversion.

The details of the PECO restructuring settlement became available in April, 1998. Until that time, PP&L had assumed that, as in the pilot, a "rate ready" model would be adopted. In the PECO settlement, a "bill ready" model was adopted. Based upon the PECO settlement, PP&L anticipated that the bill ready model would become the standard. This "bill ready" functionality was added to CSS in April and May, even though the project was only one month away from final coding. This functionality should be available with implementation of the new system in early 1999.

Since this scope expansion, PP&L has proceeded through its system testing phase. When possible to do so without affecting the overall schedule, PP&L has implemented other emerging Electronic Data Interchange (EDI) requirements when "fixes" have been required that involve changing related code.

4. **The CSS implementation has been rescheduled from a “go live” date of November 30, 1998 to January 30, 1999.**

The January 30, 1999 date was selected to align CSS implementation with the following:

- A four percent rate reduction required on January 1, 1999, per PP&L’s restructuring settlement with the PUC. This date alignment allows the bills produced by the CSS beginning on January 30th to include only the new rates.
- The end of the Pennsylvania Customer Choice pilot at the end of January. If the CSS, which uses a “bill ready” format, would be implemented in November, there would be no way to bill the pilot customers, who presently are billed using a “rate ready” format.

5. **PP&L and Andersen Consulting believe the new system should be stable prior to adding new functionality to address the emerging EDI requirements.**

Based upon experience with other Customer One installations, Andersen Consulting expects three to six months of system and business process instability after the “go live” date. For example, a recent Customer One client implementation is still not stable after a “go live” date in mid-June. Andersen Consulting believes that adding new code prior to having the current code stabilized would require approximately 15 percent more calendar time than stabilizing the current CL2000 system and then adding the code for new functionality. Testing is simpler on a stable system.

Participation in Pennsylvania Retail Competition Efforts

6. PP&L has been an active participant in Pennsylvania's retail competition efforts and has responded to emerging requirements throughout its CL2000 project.

PP&L maintains that it has been an "enthusiastic" participant. PP&L sites its testimony in 1995 and 1996 where it advocated a January 1, 1999 start date for retail competition in Pennsylvania. PP&L maintains it has been active nationally and that discussions held in a PP&L initiated large customer panel in that time frame planted the seeds for retail competition. PP&L continues to support deregulation efforts through:

- Its involvement in the Electronic Data Exchange Working Group (EDEWG);
- Activity in resolving the PECO settlement;
- Its work with the Bureau of Consumer Services to achieve design decisions that are congruent with the regulatory process;
- And, its work with the Lancaster call center (1-800-PUC-FACT).

PP&L maintains it did not decide to replace its customer information system to delay competition, but to replace a thirty-plus year old system that was not year 2000 compliant and could not support the requirements of competition.

The following table details chronologically the status of various Pennsylvania retail competition initiatives related to CIS requirements and the actions taken by PP&L and the CL2000 project in support of retail competition.

Date	Pennsylvania Retail Competition Initiatives	PP&L and CL2000 Actions
11/96		PP&L initiates CL2000 Project.
12/1/96	Pennsylvania retail competition law signed.	
5/97		EnergyPlus formed to compete in PA pilot; Connex chosen to provide a two-bill solution.
8/97		Initial CL2000 scope defined and based upon pilot requirements.
11/97	EDEWG formed by PUC.	
1/98		Began EnergyPlus business process design for CL2000.
3/98		<ul style="list-style-type: none"> • PP&L involvement in EDEWG • PP&L Interface Group established to develop interface diagrams • Assumed unbundled metering and billing wouldn't be required initially.
4/17/98	EDEWG submits Consensus Plan for Electronic Data Exchange Standards to the PUC.	
4/29/98	PECO settlement filed with PUC.	
5/12/98		Decision to make CL2000 bill ready instead of rate ready – driven off of PECO settlement.
5/14/98	PECO settlement approved by PUC.	
6/18/98	PUC Order adopts the 4/17 Consensus Plan, as modified and clarified.	

Date	Pennsylvania Retail Competition Initiatives	PP&L and CL2000 Actions
6/98		CL2000 design frozen in order to meet target implementation date.
7/1/98	PUC order that adopts Appendix C as part of PECO settlement.	
7/24/98	EDEWG submits Revised Plan: revisions, clarifications, and additions to 4/17 Consensus Plan.	
8/13/98	<ul style="list-style-type: none"> • PP&L settlement approved with PECO Appendix C as template. • PUC approval of Revised Plan entitled "Electronic Data Exchange Standards – Revisions, Clarifications and Additions," as modified and clarified. 	
9/10/98	EDEWG submits Revised PlanV2.1 with revisions, clarifications and additions to the 7/24 Revised Plan.	

Standards to Support Competitive Billing and/or Metering

7. The systems effort required to support retail competition, including competitive metering and/or billing, is enormous.

Attachments 3 and 4 demonstrate the difference in systems complexity of the pre-pilot process and evolving EDEWG process for both EDCs and EGSs. Attachment 3 illustrates the relatively simple level of transactions for customer metering and billing prior to the Pennsylvania pilot program. Attachment 4 displays a general system diagram to support the interactions in Pennsylvania's competitive environment currently being defined by the EDEWG. The evolving EDEWG process requires the synchronization of data and procedures among all EDCs and EGSs, whereas the pre-pilot process was strictly internal to each utility. This complexity is exacerbated by the fact that each EDC has a different legacy system that must be modified and

integrated with the new process requirements. Additionally, it is expected that the process displayed in Attachment 4 will continue to change to meet evolving needs.

8. The Billing Implementation Committee and the Advanced Meter Qualification and Implementation Committee, as described in sections C.1. and C.9., respectively, of Appendix C (Competitive Metering & Billing Services) in the PP&L and PECO settlements, have never been established by the PUC.

Appendix C in the PP&L settlement document was taken verbatim from PECO's settlement document. Appendix C in section C.1. (Availability of Competitive Billing Services) states:

"All direct access customers will have the opportunity to choose from three billing service options as of January 1, 1999:

- (1) Consolidated EDC Billing,
- (2) Consolidated EGS Billing, or
- (3) Separate EDC/EGS Billing."

"The PUC shall establish an ongoing Billing Implementation Committee (the 'Committee') which shall be composed of EDC representatives, EGS' representatives, customers' representatives, and PUC staff to develop and maintain appropriate and reasonable performance specifications and other appropriate terms and conditions.

Performance specifications, tariffs, and other obligations outlined in this document (including, but not limited to, a detailed Implementation Plan, which contains the necessary deliverables, a high level transaction flow, detailed design specifications, production quality test data for each rate class, and a testing plan, to fulfill this agreement) shall be developed no later than June 1, 1998, with final PUC approval no later than July 1, 1998."

Appendix C in section C.9. (Definitions and Terms for Advanced Meters and Advanced Meter Services) states in (a):

“The PUC shall establish an on-going Advanced Meter Qualification and Implementation Committee (the “Committee”) which shall be composed of EDC representatives, EGS’ representatives, customers’ representatives, and PUC staff to develop and maintain appropriate and reasonable performance specifications and other appropriate terms and conditions. Such performance specifications and terms and conditions to fulfill this agreement shall be developed no later than June 1, 1998, with final PUC approval no later than July 1, 1998. Performance specifications shall be based upon and consistent with ANSI standards”

These committees, the Billing Implementation Committee and the Advanced Meter Qualification and Implementation Committee, have never been established by the PUC, making the EDEWG’s task more difficult. Some parties have observed that the EDEWG may have expanded its mission to include defining business rules and policies in the absence of guidance from other sources, such as these committees. Discussions with non-PP&L participants in the EDEWG have raised questions and concerns regarding the original intent of the before-mentioned committees. These committees might have been helpful in defining the business rules and setting policy for the EDEWG. This would have allowed EDEWG to focus primarily on the guidelines and protocols for electronic transactions and meet a more expeditious schedule.

9. **Although systematically pursued, the EDEWG process is behind the Appendix C anticipated schedule. (Appendix C was borrowed unchanged from the PECO settlement and inserted into the PP&L settlement document.)**

The EDEWG was established in November 1997 as a subcommittee of the Pilot Implementation Committee to explore the possibility of reaching consensus on a standard set of data transaction guidelines. The PUC hoped that the EDEWG would be successful in formulating transaction protocols for each standard data exchange that would occur in a competitive generation market. It was with the first EDEWG work product in April, 1998 that PP&L's CL2000 management team had its first indication of the real regulatory requirements that the CSS could not support.

The second indication came with the PECO restructuring settlement and its Appendix C, approved on July 1, 1998.

Many of the EDI transactions necessary to support competitive billing and/or metering that were to be completed by the EDEWG and ordered by the PUC to be implemented on January 1, 1999, were only in draft status as of mid-July. As of October 10th, most of these transactions had still not been provided to the PUC in final form. Clearly, the six months of systems development time allowed to EDCs in PECO's Appendix C (and PP&L's by default), from July 1, 1998 PUC approval to January 1, 1999 implementation, has not been maintained.

The EDEWG also expects to continue to modify the EDI standards, as necessary, even after PUC approval. This may result in further EDC delays.

The following table provides detail on the status of EDI standards developed by the EDEWG to support retail competition, including competitive billing and/or metering.

Transaction	Name & Description	Est. Final Draft	PUC Approval	Comments
814	<p>Volunteer</p> <p>Conveys customer's request to be allowed to choose</p>		8/13/98	Revised for implementation 10/15/98
814	<p>Enrollment (EGS to EDC)</p> <p>Conveys customer's EGS choice to the EDC</p>		8/13/98	Revised for implementation 10/15/98
814	<p>Change</p> <p>Transfers customer's information between EGS/EDC partners</p>		8/13/98	Revised for implementation 10/15/98
814	<p>Drop</p> <p>Notifies EGS/EDC partner of customer's discontinuance of supplier relationship</p>		8/13/98	<p>Revised for implementation 10/15/98</p> <p>Also used for relocation where the change occurs on a requested date.</p>
814	<p>Reinstatement</p> <p>Rescinds customer's selection of an EGS by returning to the previously selected EGS</p>		8/13/98	Revised for implementation 10/15/98

Transaction	Name & Description	Est. Final Draft	PUC Approval	Comments
814	Request for Historical Usage or Meter Information Transmits request for history and/or meter information from an EGS to an EDC		8/13/98	
867	Historical Usage Supplies customer's historical usage information to the requesting EGS		8/13/98	Implementation date moved from 9/1/98 to 10/1/98.
867	Usage Provides usage for monthly metered customers	9/30/98		Progress made 10/7-8 and 10/14-15. (Not final as of 10/26/98.)
867	Interval Usage Provides usage for interval metered customers	9/30/98		Progress made 10/7-8 and 10/14-15. (Not final as of 10/26/98.)
650	Meter Information Provides the installed meter specifications	10/1/98		Began work in October. Will be reviewed 11/11-12.

Transaction	Name & Description	Est. Final Draft	PUC Approval	Comments
650	Meter Change Out Provides the EGS's meter information to the EDC	11/1/98		Transaction flow is described in 9/10/98 EDEWG Revised Plan.
810	Billing Supplies bill ready information to a billing partner	9/1/98		Rate ready to be signed off 10/28/98. Bill ready to be signed off 11/4-5/98.
820	Payments and Remittance Notifies EGS/EDC partner of payments	9/22/98		Per EDEWG minutes: first draft available 7/16/98. Not close to final.
568	Collections	10/1/98		Review and final 11/4-5. PP&L's Settlement Section C.2.(B).(c).(3) in conjunction with current approved EDEWG standards indicate this transaction is not required. EDEWG discussions have indicated some parties are interested in requiring this transaction.

Transaction	Name & Description	Est. Final Draft	PUC Approval	Comments
248	Write Offs	10/1/98		<p>Per EDEWG minutes: first draft available 7/16/98.</p> <p>PP&L's Settlement Section C.2.(B).(c).(3) in conjunction with current approved EDEWG standards indicate this transaction is not required.</p>
	Disputes	11/15/98		<p>Majority of EDEWG seems to believe no workable plan has been presented for this transaction.</p> <p>Alternative manual process may cover the situation.</p> <p>Probably not an issue in the providing of competitive billing and unbundled metering.</p>

Transaction	Name & Description	Est. Final Draft	PUC Approval	Comments
814	Seamless Move Allows relocating customer to transfer service if in same territory	11/15/98		Majority of EDEWG seems to believe no workable plan has been presented for this transaction. The currently approved EDEWG Standards document has a non-EDI work-around for this transaction.
	Energy Scheduling	11/1/98		Expect to revisit this standard. Not an issue in the providing of competitive billing and unbundled metering.

10. PP&L reports they will not be able to support the EDI transactions required for EGS consolidated billing and unbundled metering on January 1, 1999.

The following chart describes the implementation status of each EDI transaction at PP&L. Attachment 5 contains a preliminary workplan and schedule for implementing EGS consolidated billing (June 30, 1999) and unbundled metering (August 31, 1999).

Transaction	Name & Description	PP&L Implementation Date	Comments
814	<p>Drop</p> <p>Notifies EGS/EDC partner of customer's discontinuance of supplier relationship</p>	<p>Inbound: 10/15/98</p> <p>Outbound: 1/30/99</p>	<p>This transaction will be implemented in the legacy system and will carry forward into the CL2000 system.</p> <p>PP&L is implementing the drop only as an EGS supplied transaction with PP&L supplying a response transaction. The PP&L Access (EDC) will initiate drops for disconnects and cuts for non-payment.</p>
814	<p>Reinstatement</p> <p>Rescinds customer's selection of an EGS by returning to the previously selected EGS</p>	10/15/98	<p>This transaction will be implemented in the legacy system and will carry forward into the CL2000 system.</p>

Transaction	Name & Description	PP&L Implementation Date	Comments
814	<p>Historical Usage or Meter Information</p> <p>Transmits request for history and/or meter information from as EGS to an EDC</p>	<p>Historical Usage:</p> <p>Legacy system will supply:</p> <p>10/15/98 - 1/30/99</p> <p>CL2000 will supply beginning:</p> <p>6/30/99</p> <p>Meter Information:</p> <p>8/31/99</p>	<p>The Request for Historical Usage transaction will be implemented in the legacy system and, after a delay until 6/30/99, in the CL2000 system.</p> <p>PP&L believes the absence of this transaction for February through June, inclusive, will not impact supplier competition in its market.</p> <p>The PP&L date for meter information request transactions will restrict the possibility of unbundled metering in the PP&L market.</p>
867	<p>Historical Usage</p> <p>Supplies customer's historical usage information to the requesting EGS</p>	<p>Historical Usage:</p> <p>Legacy system will supply:</p> <p>10/15/98 - 1/30/99</p> <p>CL2000 will supply beginning:</p> <p>6/30/99</p>	<p>The Request for Historical Usage transaction will be implemented in the legacy system, and after a delay until 6/30/99, in the CL2000 system.</p> <p>PP&L believes the absence of this transaction for February through June, inclusive, will not impact supplier competition in its market.</p>

Transaction	Name & Description	PP&L Implementation Date	Comments
867	<p>Meter Usage</p> <p>Provides usage for monthly metered customers</p>	<p>Outbound: 1/30/99</p> <p>Inbound: 8/31/99</p>	<p>The outbound date should support the January Billing requirements for converted customers.</p> <p>The inbound date will restrict the possibility of unbundled metering in the PP&L market.</p>
867	<p>Interval Usage</p> <p>Provides usage for interval metered customers</p>	<p>Outbound: 1/30/99</p> <p>Inbound: 8/31/99</p>	<p>The outbound date should support the January Billing requirements for converted customers.</p> <p>The inbound date will restrict the possibility of unbundled metering in the PP&L market.</p>
650	<p>Meter Information</p> <p>Provides the installed meter specifications</p>	8/31/99	The PP&L date will restrict the possibility of unbundled metering in the PP&L market.
650	<p>Meter Change Out</p> <p>Provides the EGS's meter information to the EDC</p>	Unknown	This transaction is required for unbundled metering.

Transaction	Name & Description	PP&L Implementation Date	Comments
810	<p>Billing</p> <p>Supplies bill ready information to a billing partner</p>	<p>Inbound: 1/30/99</p> <p>Outbound: 6/30/99</p>	<p>The inbound date should support the January EDC Consolidated Billing requirements for converted customers.</p> <p>The outbound date will restrict the possibility of EGS Consolidated billing in the PP&L market.</p>
820	<p>Payments and Remittance</p> <p>Notifies EGS/EDC partner of payments</p>	1/30/99	<p>The PP&L date should support the January Billing requirements for converted customers.</p>
568	<p>Collections</p>		<p>PP&L's Settlement Section C.2.(B).(c).(3) in conjunction with current approved EDEWG Standards indicate this transaction is not required.</p> <p>EDEWG discussions have indicated some parties are interested in requiring this transaction.</p>

Transaction	Name & Description	PP&L Implementation Date	Comments
248	Write Offs		PP&L's Settlement Section C.2.(B).(c).(3) in conjunction with current approved EDEWG Standards indicate this transaction is not required.
	Disputes		<p>No transaction flow in consensus plan.</p> <p>Alternative manual process may cover the situation.</p> <p>Probably not an issue in the providing of competitive billing and unbundled metering.</p>
814	Seamless Move Allows relocating customer to transfer service if in same territory		<p>No transaction flow in consensus plan.</p> <p>Majority of EDEWG seems to believe no workable plan has been presented for this transaction.</p> <p>The currently approved EDEWG Standards document has a work-around for this transaction.</p>

Transaction	Name & Description	PP&L Implementation Date	Comments
	Energy Scheduling		<p>No transaction flow in consensus plan.</p> <p>Not an issue in the providing of competitive billing and unbundled metering.</p>

11. Definitions of "Competitive Metering and/or Billing" vary between the Petitioners, the PUC and the Pennsylvania utilities.

The petitioners, namely Enron, expect Appendix C of the PECO settlement to be the statewide model for competitive billing and/or metering. They expect a standard process across all utilities in the state of Pennsylvania, with standard file formats and strong conformity among participants. While this may be desirable in order to facilitate the development of a dynamic competitive market for retail energy in Pennsylvania, the Commission has not clearly stated such an intent.

The PUC clarified, in its June 26, 1998 Order, that there was no implied relationship between supplier services and either consolidated billing or advanced metering services. PECO was ordered to develop a third party billing option where there is no relationship between the supplier and biller.

12. PP&L has chosen to maintain the CL2000 installation schedule to the potential detriment or benefit of its own Energy Plus retail marketer.

The March 31, 1998 EnergyPlus functional requirements indicate a number of requirements to be implemented after the initial CSS conversion. This prioritization of requirements was done to maintain PP&L's implementation schedule and EnergyPlus was promised enhancements to meet its full range of requirements would be rolled out in subsequent releases beginning in June 1999. This raises the possibility that system development, testing, and implementation resource prioritization decisions made by the CL2000 project team over the next few months may help or hinder EnergyPlus vis-à-vis other energy retailers in the Pennsylvania marketplace.

CONCLUSIONS

1. **PP&L's decision to replace its CIS was driven by the necessity to deal with a Year 2000 issue and unidentified competitive requirements. PP&L has made efforts to respond to Pennsylvania's retail competition efforts without jeopardizing the overall implementation of its CSS system, and its ability to have a functioning system well before January 1, 2000.**

See Findings #1, #2, #3 and #6.

2. **It will be difficult for all EDCs, including PP&L, to implement the necessary EDI transactions for competitive metering and/or billing by January 1, 1999. A six-month time frame was allotted to PECO (in Appendix C) to implement the standards. Because PP&L's settlement was not approved until mid-August, PP&L would have significantly less time to meet a January 1, 1999 deadline, as would all other EDCs in Pennsylvania. This issue is exacerbated by the fact that completion of standards and other requirements (see Finding #8) have not occurred as quickly as expected. A six-month time frame seems reasonable considering the systems and business process changes required.**

Programming to standards that are still changing can be a time consuming and inefficient process for both developers and businesses -- especially when final transactions have numerous changes pending and draft transactions change substantially as they proceed to final status. Such is the case with the following transactions required to support competitive metering and/or billing:

- 814 Request for Historical Usage or Meter Information
- 867 Historical Usage
- 867 Meter Usage
- 867 Interval Usage
- 650 Meter Information
- 650 Meter Change Out
- 810 Billing

According to the September 10, 1998 *Electronic Data Exchange Standards* report, the last of the unbundled metering transactions, the 650 Meter Change Out, is not expected to be finalized for PUC consideration until November 1, 1998.

The work involved to implement a standard does not end with the programming; but, it must support the business process. The changes to the business process can sometimes be the most time consuming part, in that integration with other business tasks must occur and users must be trained to perform their work differently.

The fact that only three EDCs in Pennsylvania have approved restructuring settlements from the PUC also drives the question of a viable January 1, 1999 implementation date. Restructuring agreements may differ among the EDCs. For example, the PUC indicated in its August 13, 1998 Order that some EDCs may continue rate ready billing past January 1, 1999.

- 3. The programming requirements to add unbundled metering and EGS consolidated billing to the CL2000 system are significant. It would not be prudent to implement this functionality before the CL2000 system, with its current functionality, is stable.**

In order to get an accurate measure of development time for new functionality, the data elements required for a new transaction must be compared to those that exist in the system's datastore. If all data elements exist, the development will be significantly faster than if new data elements must be added. If new data elements must be added, the development becomes more complex: the elements must be added to the datastore, populated with data, and maintenance routines coded.

Additionally, it is not prudent to modify the datastore and program code for new data elements as a system is proceeding through various levels of testing, immediately prior to implementation. When these types of significant changes are made, testing scripts must be re-written and re-testing must occur, lengthening the testing period and possibly delaying the implementation date. The only changes that are reasonable during this period are those that can be implemented with limited changes to the code that is being tested. For example, extract applications that operate external to the existing code (e.g., the 867 Historical Usage transaction) can be successfully added during a conversion process.

Immediately after a new system is implemented, problems that did not appear in testing inevitably arise. The testing scripts and an unmodified code base are required when urgent coding and testing changes must be made to maintain daily operation. This start-up period will continue through at least one monthly business cycle and longer for those portions of the system where stability is more difficult to achieve. Once a system, or portion, has achieved stability, significant changes in functionality can be made.

PP&L is currently in a significant testing phase that follows development, and immediately precedes implementation. Altering significant requirements during this period, such as those in EGS consolidated billing and unbundled metering, will restart portions of PP&L's testing cycle and require alteration of the testing scripts. PP&L has already made significant adjustments (e.g., change from rate ready to bill ready in May, 1998) and continues to manage through changing standards without altering the overall CSS implementation date. With a target implementation date of January 30, 1999, adding the functionality required for EGS consolidated billing and unbundled metering (the standards for which are also still changing) in parallel with current testing will significantly alter the CL2000 implementation schedule. This conclusion would remain unchanged even if additional resources were applied to the CL2000 project.

- 4. The current EDI design as shown in the September 10, 1998 *Electronic Data Exchange Standards (Revised Plan V2.1 with revisions, clarifications and additions)* does not consider the potential areas where loss of data synchronization between an EDC and an EGS can affect processing.**

The data exchanged between an EDC and an EGS in the 814 transactions also affect the direction or destination for the data in subsequent 867 Monthly/Interval Usage and 810 Billing transactions. If rejected 814 transaction changes are not corrected (especially generation supplier, number of bills, and meter ownership), the subsequent 867 and 810 transactions will be passed in the wrong direction and/or to the wrong entity. For example, one scenario involves a customer who wishes to switch from one bill to two bills and notifies its EGS (because the EGS is currently providing the bill), who then notifies the EDC with an 814 transaction. If the EDC rejects the 814 (which occasionally will happen in an EDI environment) without manually correcting its database, the EDC will continue to send its 810 Billing transaction to the EGS. The EGS will likely ignore the transaction, and the customer will not be billed for the EDC charges.

Likewise, incomplete data recoveries or programming errors can cause the same data routing problems.

5. It is possible for PP&L to prioritize CSS development, testing, and implementation resources to the benefit of EnergyPlus and the detriment of other EGSs.

There is a long list of "subsequent" enhancements, including the transactions needed to implement supplier consolidated billing and competitive metering. The CL2000 project has considerable latitude to assign resources to tasks that enhance features requested by EnergyPlus, tasks required by the settlement and the emerging EDEWG standards, and tasks requested by PP&L's EDC. The Commission should maintain oversight of these post-conversion resource allocation decisions to avoid the appearance of or actual achievement of a competitive advantage for Energy Plus vis-à-vis other EGSs.

RECOMMENDATIONS

- 1. Implement the 814 Request for Historical Usage or Meter Information and 867 Historical Usage transactions on the CL2000 system within six weeks of conversion (March 15, 1999).**

This transaction is currently being performed on PP&L's legacy system. Upon the CL2000 implementation date, January 30, 1999, the legacy system will cease to function and PP&L will lose the capability to perform the 867 Historical Usage transaction. PP&L estimates this functionality will be available on the CL2000 by June 30, 1999.

PP&L reports that the necessary data elements for this transaction are in the CL2000 datastore and the extract of this data would take about three weeks to code and test. Because these data elements exist, and the extract applications operate largely outside the existing code, this transaction should not require five months to implement. Given appropriate staffing, this transaction could be implemented within six weeks of conversion (by March 15, 1999) without jeopardizing the overall CSS implementation.

- 2. Implement the EGS consolidated billing transactions by June 30, 1999 or three months after final PUC approval of the necessary transactions, whichever is later.**

Currently the only required transaction to support this process is 810 Billing. This transaction will be reviewed by the EDEWG on October 28-29, 1998.

- 3. Implement unbundled metering transactions by August 31, 1999 or five months after final PUC approval of the necessary transactions, whichever is later.**

The PUC has approved only the 814 Historical Usage or Meter Information and the 867 Historical Usage transactions. The remaining necessary transactions to support unbundled metering include:

- 814 Historical Usage or Meter Information (only the portion not previously implemented by PP&L)
- Inbound 867 Meter and Interval Usage
- 650 Meter Information
- 650 Meter Change Out

4. The following table provides Hagler Bailly's recommendations on the implementation of unbundled metering and EGS consolidated billing transactions.

Transaction	Name & Description	PP&L's Stated Implementation Date	Hagler Bailly Recommendation
814	<p>Request for Historical Usage or Meter Information</p> <p>Transmits request for history and/or meter information from as EGS to an EDC</p>	<p>Historical Usage:</p> <p>Legacy system will supply: 10/15/98 - 1/30/99</p> <p>CL2000 will supply beginning: 6/30/99</p> <p>Meter Information: 8/31/99</p>	<p>This transaction could be implemented in the CL2000 system prior to 6/30/99; a reasonable date to expect implementation is 3/15/99. The changes may result in some re-testing of the CL2000 system in the area of EDI extract processing.</p> <p>This transaction can and should be implemented concurrently with the 650 Meter Information transaction.</p>
867	<p>Historical Usage</p> <p>Supplies customer's historical usage information to the requesting EGS</p>	<p>Legacy system will supply:</p> <p>10/15/98 - 1/30/99</p> <p>CL2000 will supply beginning: 6/30/99</p>	<p>PP&L reports the necessary data elements are in the CL2000 datastore and extract of this data would take about 3 weeks to code and test.</p> <p>This transaction could be implemented in the CL2000 system prior to 6/30/99; a reasonable date to expect implementation is 3/15/99. The changes should not result in significant re-testing of the CL2000 system.</p>

Transaction	Name & Description	PP&L's Stated Implementation Date	Hagler Bailly Recommendation
867	<p>Meter Usage</p> <p>Provides usage for monthly metered customers</p>	<p>Outbound: 1/30/99</p> <p>Inbound: 8/31/99</p>	<p>The outbound date should support the January billing requirements for converted customers.</p> <p>This transaction involves considerable coding changes and related changes to support the additional control points in the areas of meter reading and bill calculation. As those functions comprise a significant portion of the system, attempting to integrate these requirements now would cause additional design, increased development and testing. The resulting delay would affect both PP&L's system conversion and any form of non-pilot competition in PP&L's market.</p> <p>Based upon the incomplete specifications and transaction guidelines to support unbundled metering, the 8/31/99 implementation date seems reasonable.</p>

Transaction	Name & Description	PP&L's Stated Implementation Date	Hagler Bailly Recommendation
867	<p>Interval Usage</p> <p>Provides interval meter usage information</p>	<p>Outbound: 1/30/99</p> <p>Inbound: 8/31/99</p>	<p>The outbound date should support the January Billing requirements for converted customers.</p> <p>This transaction involves considerable coding changes and related changes to support the additional control points in the areas of meter reading and bill calculation. As those functions comprise a significant portion of the system, attempting to integrate these requirements now would cause additional design, increased development and testing. The resulting delay would affect both PP&L's system conversion and any form of non-pilot competition in PP&L's market.</p> <p>Based upon the incomplete specifications and transaction guidelines to support unbundled metering, the 8/31/99 implementation date seems reasonable.</p>

Transaction	Name & Description	PP&L's Stated Implementation Date	Hagler Bailly Recommendation
650	<p>Meter Information</p> <p>Provides the installed meter specifications</p>	8/31/99	<p>This transaction impacts PP&L's ability to implement unbundled metering.</p> <p>The transaction specifications are not yet available. When they become available, the data elements required for the transaction must be compared with the data in the CL2000 datastore. If all the data elements exist in the CL2000, this transaction could be implemented earlier than indicated. If data element changes are required, the indicated date is reasonable.</p>
650	<p>Meter Change Out</p> <p>Provides the EGS's meter information to the EDC</p>	Unknown	<p>This transaction impacts PP&L's ability to implement unbundled metering.</p> <p>To support unbundled metering, this transaction must be completed prior to or concurrent with the inbound 867 Meter/Interval Usage transaction.</p>

Transaction	Name & Description	PP&L's Stated Implementation Date	Hagler Bailly Recommendation
810	<p>Billing</p> <p>Supplies bill ready information to a billing partner</p>	<p>Inbound: 1/30/99</p> <p>Outbound: 6/30/99</p>	<p>The inbound date should support the January EDC Consolidated Billing requirements for converted customers.</p> <p>This transaction impacts EGS consolidated billing.</p> <p>PP&L reports that most, if not all, of the data elements to support this transaction are in the CL2000 datastore. Because this transaction requires significant changes to the billing areas of the CL2000 application, attempting to integrate these requirements now would cause additional design, increased development and testing. The resulting delay would affect both PP&L's system conversion and any form of non-pilot competition in PP&L's market.</p> <p>Based upon the significance of the required changes and advanced development phase of the CL2000 system, the 6/30/99 implementation date for this transaction seems reasonable.</p>

5. Develop EDI response and missing data transactions to prevent loss of synchronization between an EDC and an EGS.

When two systems are communicating, one system will detect missing data when it has no master record for another partner's transaction. In the short-term, these items could be handled in a faxed report from the receiving partner to the sending partner, however long-term EDI response transactions should be considered. An additional means of detecting data synchronization errors is to determine if any data was omitted from the transmission. Again, a short-term solution would be to handle these items in a faxed report. However, EDI transactions to indicate apparent missing data should be considered. Both of these conditions will be corrected by modification to the master data of one of the partners, after consultation to determine who has the correct data.

Continuous development and testing of EDI standards is critical to the success of retail competition in the Commonwealth of Pennsylvania.

6. Implement ongoing oversight of the CL2000 post-conversion task prioritization, schedule, and resource allocation to assure timely implementation of the capabilities required by the settlement and eliminate the potential for favoring EnergyPlus.

PP&L should be required to file periodic status reports with the appropriate PUC bureau(s) beginning one month after conversion to the CSS (March 1, 1999). These reports should briefly provide the status of the following:

- Efforts to achieve CSS stability
- EnergyPlus tasks
- Restructuring settlement and EDEWG requirements
- New EDC requests

The status report should also describe past period accomplishments and objectives for the upcoming period.

ATTACHMENT ONE

PP&L's CL 2000 Project Scope and Schedule as of August, 1997

ATTACHMENT TWO

PP&L's CL 2000 Project Scope Expansion as of May, 1998



Competitive Requirements

Delivery Efforts (Days)

Build	3,021
Testing	613
Change Management Development	320
Deployment	200
Conversion	307
Technical Support	400
Project Management	<u>278</u>
	5,139
PP&L Energy Plus	2,288
PP&L Access	2,851

Attachment 2: PP&L's CL 2000 Project Scope Expansion as of May, 1998
PP&L/ Andersen Consulting

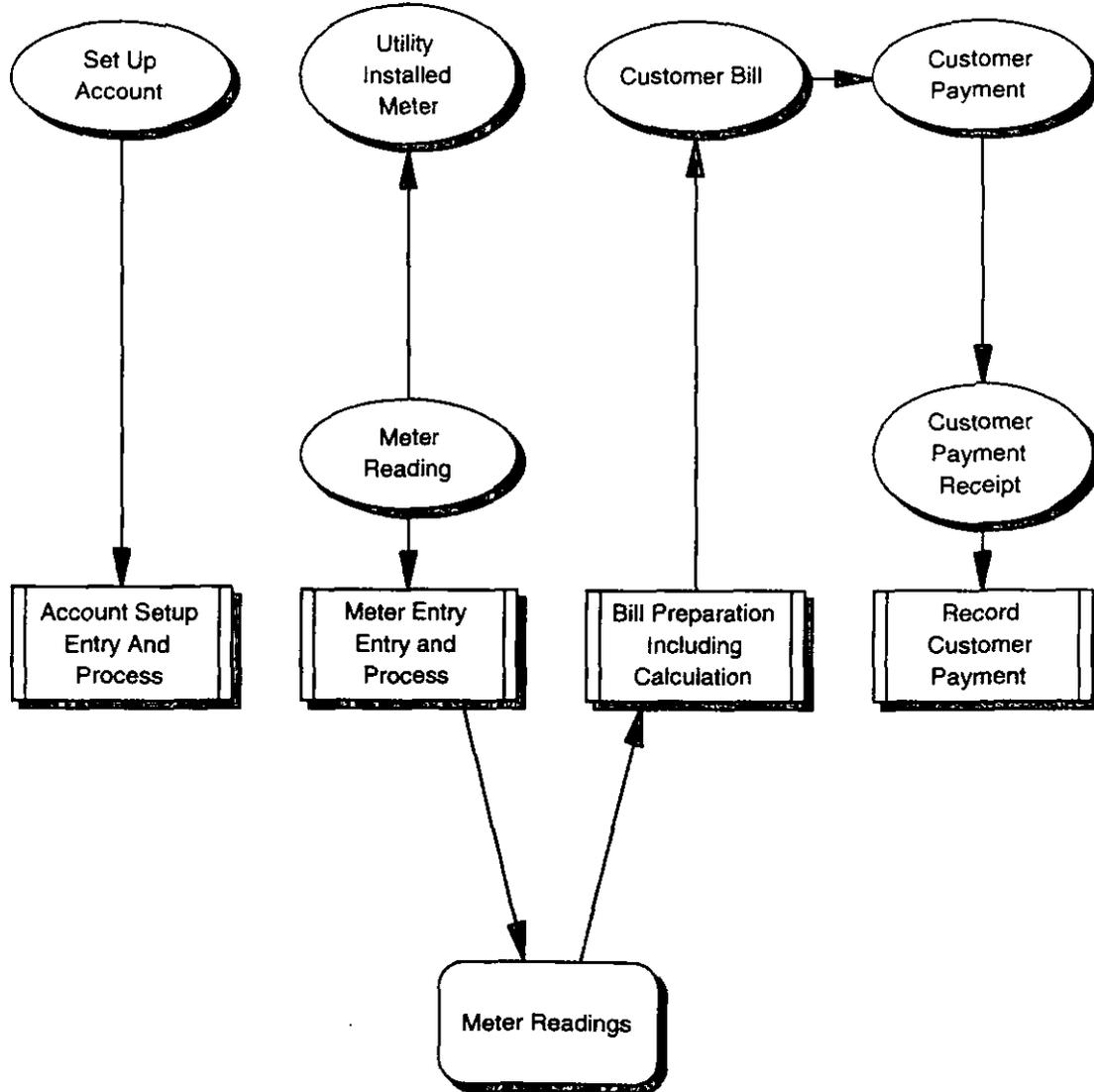


ANDERSEN
CONSULTING

ATTACHMENT THREE

Pennsylvania Pre-Pilot Program Metering and Billing Process

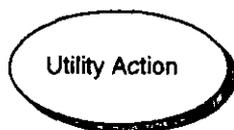
Standard Utility System Implementation



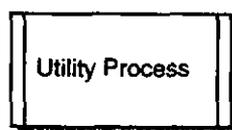
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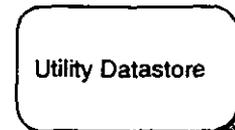
Customer Action



Utility Action



Utility Process



Utility Datastore

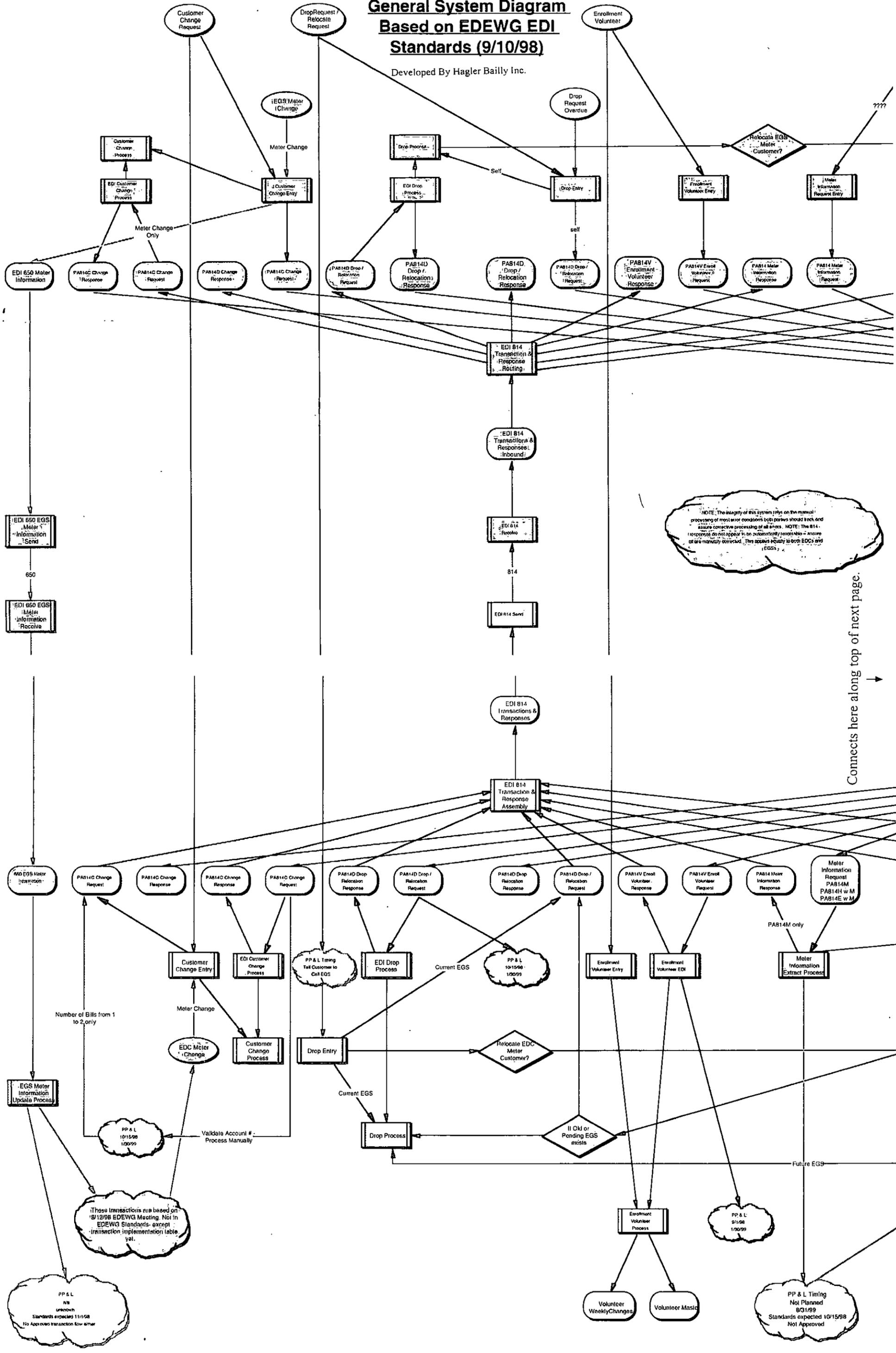
ATTACHMENT FOUR

**General System Diagram Based on Electronic Data Exchange Working Group (EDEWG)
Electronic Data Interchange (EDI) Standards**

Hagler Bailly, Inc.

General System Diagram Based on EDEWG EDI Standards (9/10/98)

Developed By Hagler Bailly Inc.



NOTE: The integrity of this system relies on the manual processing of most error conditions. Both parties should track and submit corrective processing of all errors. NOTE: The 814 responses do not apply to an automatically reversible - assure or a manually corrected. This applies equally to both EDCs and EGSs.

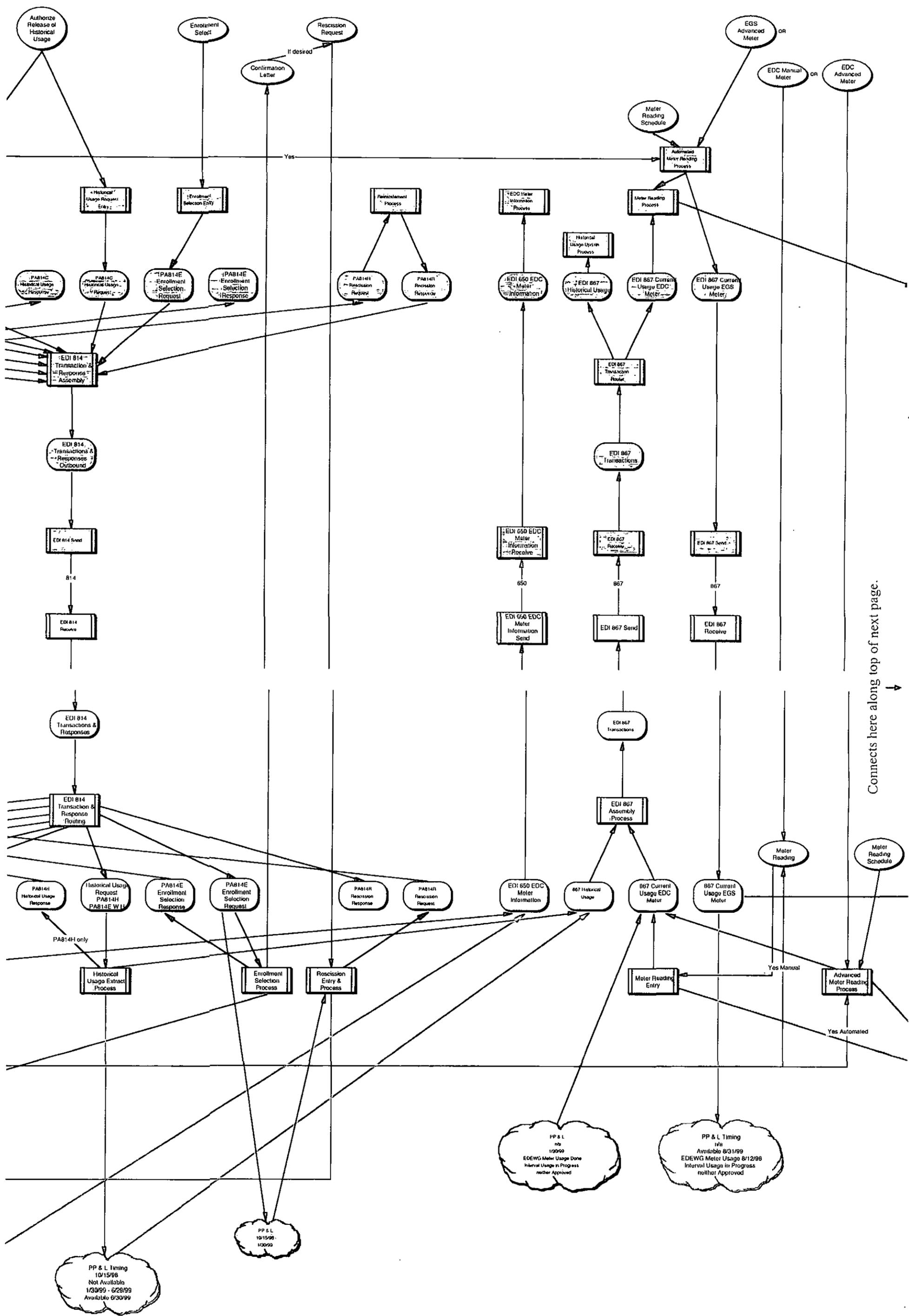
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PP & L
N/A
Standards expected 11/1/98
No Approved transaction flow either

These transactions are based on 9/12/98 EDEWG Meeting. Not in EDEWG Standards - except - transaction implementation table, yet.

Volunteer Weekly Changes
Volunteer Misc

PP & L Timing
Not Planned
8/31/99
Standards expected 10/15/98
Not Approved



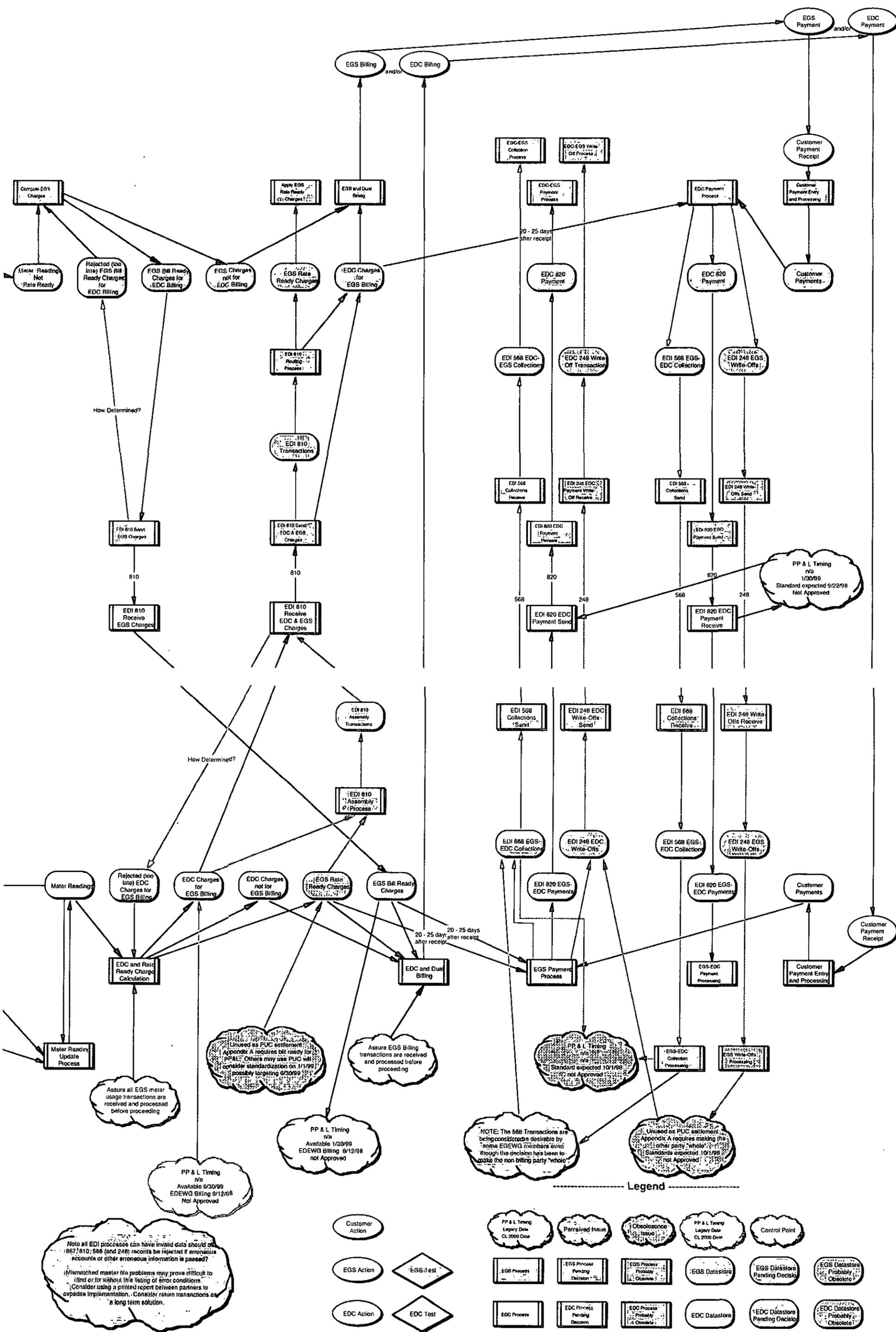
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PP & L Timing
10/15/98
Not Available
1/30/99 - 6/29/99
Available 8/30/99

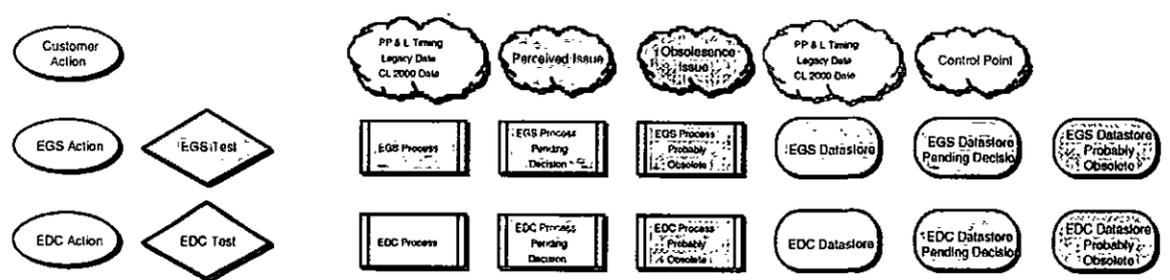
PP & L
10/15/98
1/30/99

PP & L
1/30/99
EDEWG Meter Usage Done
Interval Usage in Progress
Neither Approved

PP & L Timing
1/31/99
EDEWG Meter Usage 8/12/98
Interval Usage in Progress
Neither Approved



Legend



ATTACHMENT FIVE

**PP&L's CL 2000 Workplan for Implementation of Supplier (EGS)
Consolidated Billing and Unbundled Metering**

Attachment 5: PP&L's CL 2000 Preliminary Workplan for Implementation of Supplier (EGS) Consolidated Billing and Unbundled Metering

PP&L/ Andersen Consulting

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CL2000 Development Methodology

The development methodology employed by the CL2000 project is a phased approach whose objective is to ensure accurate, efficient, and timely implementation of business requirements for PPL. The phases of the development methodology are defined below.

Define Application Requirements

- Determine the requirements that need to be met relative to the business-function processes. The requirements defined in this phase will serve to define the scope of the application development. The set of requirements defined during this phase, and possibly modified throughout the remainder of the effort, will serve as a commitment of the scope of the work being delivered.

Technical Design

- The purpose of the technical design is to design application-module level modifications required to fulfill the modification requirements specified in the Application Requirements phase.

Build

The build phase is composed of several tasks performed in order.

- Detailed Design: Take the module-level change specification from technical design and convert them into detailed design specifications. These detailed design specifications must be at the appropriate level to be interpreted by a programmer/analyst and transformed into working program modules.
- Programming: Take module-level design specifications from detailed design and convert them into working application modules. The completed application modules must be coded to specific technical and usability standards.
- Component Test: Ensure that a single module performs as designed.
- Assembly Test: Ensure that the modified processes are operating as designed from both a technical and a functional perspective when tested as stand-alone functions.

Product Test

- The purpose of Product Test is to ensure that the system works together as a whole. The test will ensure that standard scenarios can be processed through the system.

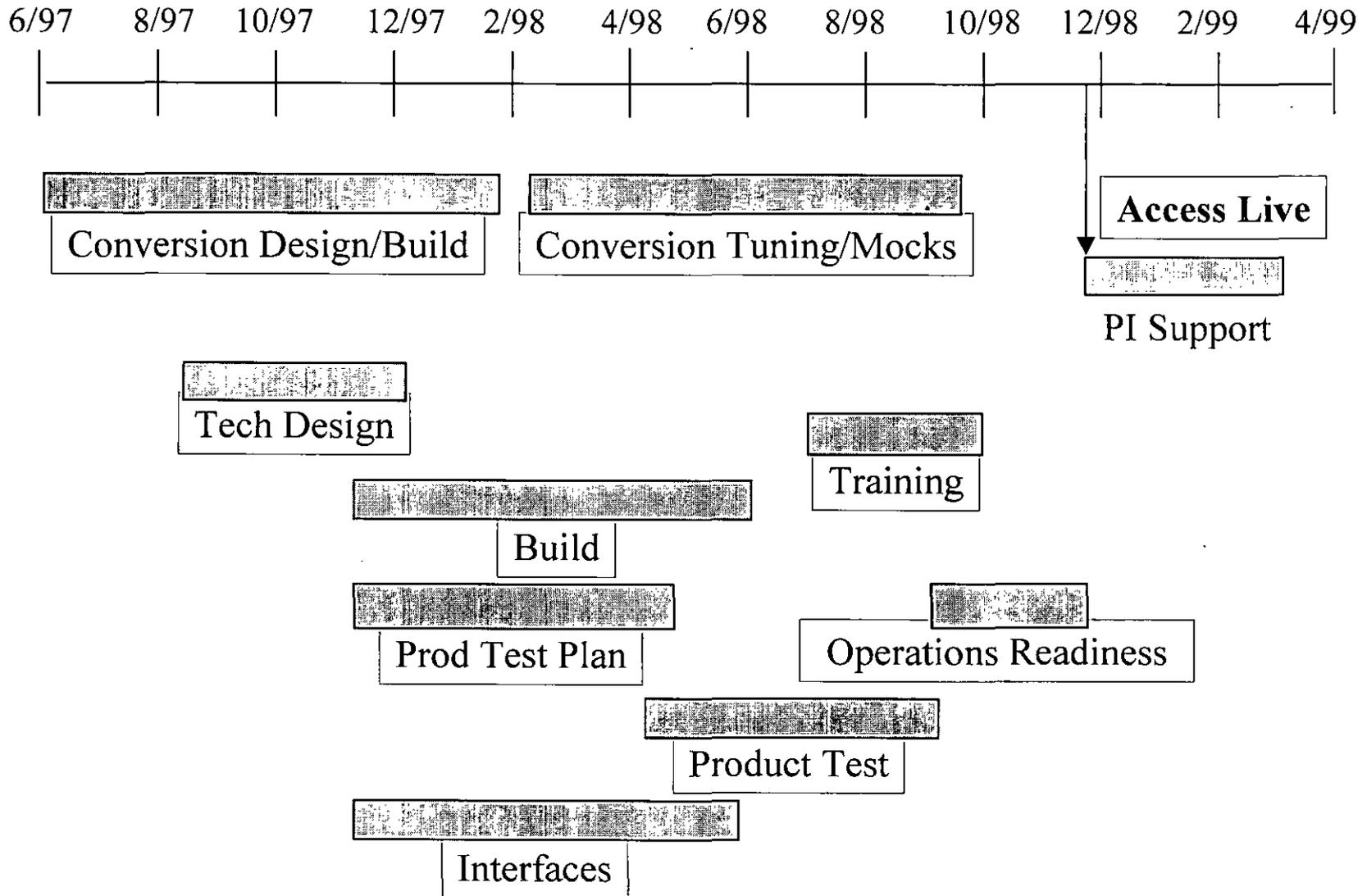
Operations Readiness

- Ensure that the system has not been broken by any changes that have been introduced. This test will serve as a "system monitor" to ensure that a stable working application is maintained.

Post-Implementation Support

- The support a system requires immediately after going "live". For CL2000, this support will include investigation and resolution of billing issues (billing errors, accounts that are not billing, etc.), support for the CL2000 user community (help desk, on-site support, etc.), and investigation and resolution of issues related to online and batch system problems.

CL2000 Timeline



PPL Settlement Items

This section describes the effort to implement Supplier-consolidated billing and unbundled metering into the PPL Customer Service System. This discussion includes assumptions, questions, and design considerations. As part of the methodology employed by PPL, the validation of assumptions and clarification of questions would occur in the Requirements Analysis phase of development.

Supplier Consolidated Billing

In supplier consolidated billing, the EGS will produce a single bill containing both EDC and EGS charges. This will be a bill-ready approach, in that the EDC will calculate its own charges and pass this information to the EGS for bill presentation. The EGS will prepare the bill and mail to the customer. In addition, X days after the bill is rendered, the EGS will remit payment for the EDC charges.

PPL Access Business Rules:

- The EGS will be responsible for collections on Access balances generated under a supplier-consolidated billing plan.
- Access will be responsible for collections on balances generated prior to the account's switch to supplier-consolidated billing plan.
- Access will be responsible for reporting taxes on its portion of the bill.
- Budget Billing will be supported by the EDC and EGS individually (i.e., each portion of the bill may be on budget billing separately).
- The EGS will be responsible for setting up all payment plans (collection arrangements, payment arrangements, and special agreements) for balances generated under a supplier-consolidated billing plan.

PPL Access Impacts (above and beyond retail access functionality currently planned):

- Produce EDI transaction for EGS with billing charges for EGS bill presentation.
- Receive EDI transaction from EGS for payment of receivable.
- Modify Access billing to not produce a bill for accounts on a 1-bill, supplier-consolidated rate. Rather, produce an EDI transaction for the EGS.
- Produce EDI transaction(s) to support billing adjustments/cancels of EDC portion of bill.
- Settle/resolve active payment arrangements when account switches from other billing option to supplier-consolidate bill.
- Remove account from summary billing plan, EFT, etc. – Any options/plans that are dependent on the generation of a bill.
- Make CSS database change to support 1-bill, supplier-consolidated option. Current database design includes a flag to indicate 1-bill. This should be changed to a code.
- Modify enrollment process to support the reclassification of outstanding balances to Access-collected monies when account switches to supplier-consolidated bill option.
- Modify collections to support concept of monies to be collected by Access, monies to be collected by EGS. This will allow software to support option switching and supplier switching by the customer.
- Modify collection arrangement, special agreement functionality to support payment plans for non-supplier-consolidated charges.

Supplier Assumptions:

- The supplier will be responsible for collecting EDC balances.
- The supplier will be responsible for reporting taxes on its portion of the bill (but not the EDC's portion).
- Budget Billing will be supported by the EDC and EGS individually (i.e., each portion of the bill may be on budget billing separately).

Supplier Impacts (above and beyond retail access functionality currently planned):

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- Receive EDI transaction from EDC with billing charges for EGS bill presentation.
- Produce EDI transaction for EDC for payment of receivable.
- Receive EDI transaction(s) to support EDC billing adjustments/cancels.
- Modify supplier account setup to establish EDC business for accounts on 1-bill, supplier-consolidated rate.

Training:

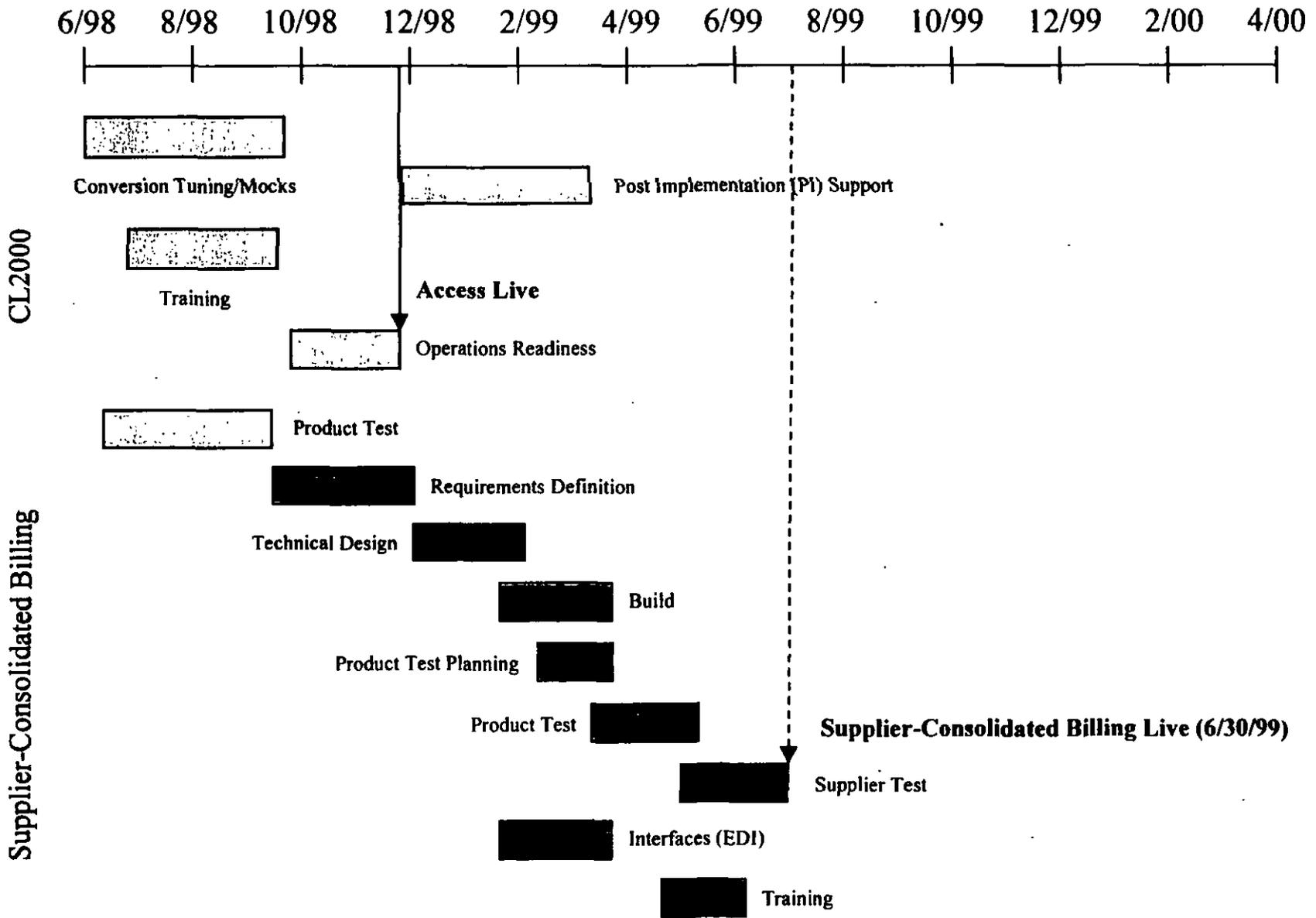
- Development and implementation of training for Telephone Service Representatives and billing personnel.

Implementation Schedule:

- The implementation schedule for Supplier-consolidated billing takes into account the level of effort required to support this item, the current plan for CL2000, and the reality of the development of the competitive market in Pennsylvania. Current competitive requirements continue to undergo refinement and clarification – resulting in changes to system functionality. It is expected that this environment will continue.

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Supplier-Consolidated Billing Implementation Timeline (with CL2000)



Unbundled Metering

In unbundled metering, the EDC will not own each meter in its service territory. Rather, a Metering Service Provider owns the meter and a Meter Data Management Agent reads the meter and provides metering information to the EDC or EGS for bill calculation.

PPL Access Assumptions:

- This approach addresses making Access unbundled metering-enabled.
- The format for the communication of metering information (i.e., meter readings and/or consumption) to the EDC will be standard across meter owners.
- All 3rd Party meters will be advanced meters.

Questions:

- How will the removal of a PPL Access meter and the installation of a 3rd Party (and vice versa) meter be coordinated?
- How will meter service/investigation requests be initiated? (i.e., a customer calls about a high bill). Who will perform meter service?
- Will EDC have capability to make requests for off-cycle reads? (i.e., a customer calls to final account – final meter reading is necessary. Or service is being disconnected due to non-payment).
- Will PPL Access have the ability to disconnect these meters for non-payment?
- What are the defined relationships between the Meter Data Management Agent, Metering Service Provider, EDC, and EGS?
- Will unbundled metering be made available for the residential market?

PPL Access Impacts:

- Receive metering information from meter owner. This would include initial meter reading and possibly meter attributes.
- Initiate meter reading requests to meter owner.
- Receive communication of meter attribute changes (i.e., meter change outs).

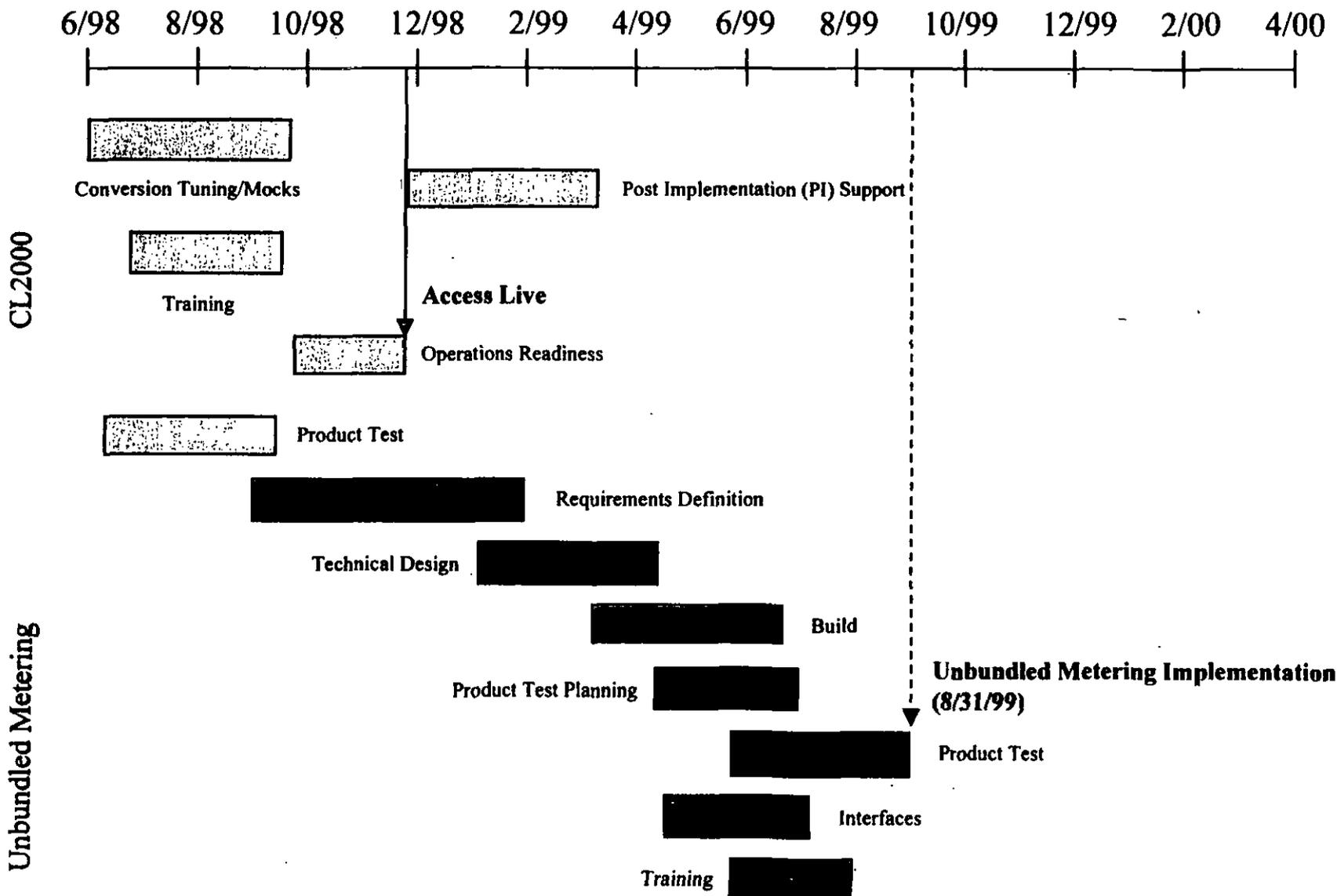
Training:

- Development and implementation of training for Telephone Service Representatives and meter personnel to support unbundled metering.

Implementation Schedule:

- The implementation schedule for Unbundled Metering takes into account the level of effort required to define the requirements at a level of detail sufficient for system development. The schedule also takes into account the current plan for CL2000 and the reality of the development of the competitive market in PA. Current competitive requirements continue to undergo refinement and clarification – resulting in changes to system functionality. It is expected that this environment will continue.

Unbundled Metering Implementation Timeline (with CL2000)



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BOHDAN R PANKIW ESQUIRE
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HARRISBURG PA 17105-3265

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AND NOW, to wit, this 3rd day of November, ^{KJR} 1998,

the undersigned, as evidence by execution hereof, acknowledges receipt and accepts service of ONE COPY REVIEW OF POTENTIAL IMPEDIMENTS TO PP&L IMPLEMENTATION OF COMPETITIVE METERING & BILLING an official Commission document entered, issued, or otherwise promulgated under date of NOVEMBER 2, 1998 at Docket No R-00973954 on behalf of:

JOHNNIE SIMMS ESQUIRE
OFFICE OF TRIAL STAFF
P O BOX 3265
HARRISBURG PA 17105

Susan J. Herb
Signature

Kindly sign and date this acceptance of service and acknowledgement of receipt, and, return the same for filing to:

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OFFICE OF SMALL BUSINESS ADVOC
300 N SECOND ST STE 1102
HARRISBURG PA 17101

OFFICE OF SMALL
BUSINESS ADVOCATE

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January 20, 1999

Via Hand Delivery

Chairman John M. Quain
Vice Chairman Robert K. Bloom
Commissioner David W. Rolka
Commissioner Nora Mead Brownell
Commissioner Aaron Wilson, Jr.
Pennsylvania Public Utility Commission
North Office Building - Room 104
P.O. Box 3265
Harrisburg, PA 17105-3265

DOCKETED
JAN 25 1999

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SECRETARY'S BUREAU

RE: PJM Installed Capacity and Network Transmission Matters; Docket Nos.
R-00973953, R-00973954, R-00974008 and R-00974009.

Dear Chairman Quain and Commissioners:

The Mid-Atlantic Power Supply Association respectfully submits a status report (Attachment A) on PJM installed capacity and network transmission obligations. The status report has been accepted by the Pennsylvania EDCs (PECO, PP&L and GPU) and the EGSs working within the PJM Customer Choice User Group. In particular, the status report reflects acceptance by EGSs of EDCs providing retail customer load information to PJM for the period January-May 1999, coupled with agreement on core principles to govern the period beginning June 1999.

In the case of PECO, the core principles were accepted and also summarized in an e-mail that is provided herewith (Attachment B), and we believe there is no disagreement with that summary. In the case of GPU, its position is one of general agreement on the concepts underlying the core principles.

We are also attaching specific load information for the three Pennsylvania PJM EDCs that has been accepted for the period January-May 1999: PECO (Attachment C); PP&L (Attachment D) and GPU (Attachment E). This load information is provided to PJM which then makes adjustments as summarized on its web site (Attachment F) to determine the installed capacity and network transmission obligations associated with an EGS's retail customers.

DOCUMENT
FOLDER

Chairman John M. Quain and Commissioners
Re: PJM Installed Capacity and Network Transmission Matters
January 20, 1999
Page Two

Copies of this letter and the attachments are being provided to the three Pennsylvania PJM EDCs and to other members of the PJM Customer Choice User Group. We believe that the participants are pleased that the January-May 1999 period has been settled, and we are hopeful that post-May 1999 matters will be resolved given general agreement on the core principles that will govern the resolution.

This letter and the attachments are being submitted for the Commission's information regarding PJM developments relevant to the implementation of retail customer choice in Pennsylvania. To the best of our knowledge no entity is requesting Commission action regarding this material or making any representation with respect to the jurisdiction of the Commission.

Sincerely,



Todd S. Stewart
Counsel for the Mid Atlantic
Power Supply Association

cc: John Levin, Esquire, Law Bureau (via hand delivery)
David Pratzon, PECO Energy (via facsimile transmission w/attachments)
Brent Schaefer, PP&L, Inc. (via facsimile transmission w/attachments)
Kenneth Reif, PP&L, Inc. (via facsimile transmission w/attachments)
Gary Miner, GPU Energy (via facsimile transmission w/attachments)
PJM Customer Choice Users Group

**DETERMINATIONS OF CAPACITY AND
TRANSMISSION OBLIGATIONS
ASSOCIATED WITH RETAIL CUSTOMERS:
STATUS REPORT OF CUSTOMER CHOICE USER GROUP**

This status report reflects discussions and interim understandings among participants in the PJM Customer Choice User Group. This report addresses the determinations and reporting to PJM of load associated with retail customer installed capacity and network transmission obligations. It does not address energy forecasting, scheduling and reconciliation. This report addresses Pennsylvania utilities and load serving entities serving Pennsylvania retail customers.

CORE PRINCIPLES

The following core principles should apply in making capacity and transmission determinations. Although principles by their nature are susceptible of varying interpretations, the Group believes that it is worthwhile to set forth *general* principles to guide the process.

1. The sum of the obligations of the retail customers in a zone should equal the overall retail zonal obligation. This principle ensures that regardless of the load serving entity or entities that the "parts equal the whole." This principle necessitates that the wholesale-related portion of the zonal obligation be removed before an allocation among retail customers is made. A reduction in the retail zonal obligation for ALM credits is not necessary so long as the ALM credits travel with the customer.
2. The obligation associated with every retail customer should be determined on a consistent method regardless of whether the customer is served by an EGS or the utility. At a minimum, consistency is called for on a rate class basis within a particular zone.
3. Application of a consistent method to all customers in a zone, with the sum of all retail customer obligations equal to the retail zonal obligation, rules out a "residual" approach under which obligations ascribed to EGS customers are simply subtracted from the zonal obligation to determine the utility obligation. In essence, each retail customer needs to have an actual or objectively determinable "tag" that, when summed, equals the retail zonal obligation.
4. Where actual demand or interval meter readings are available, they should be reflected in the obligation, *i.e.*, actual data is preferred to estimated, aggregated data, and customers should be able to respond to "price signals" on an individual basis.
5. Calculations need to be reproducible by any load serving entity using a transparent

method that is as simple as possible consistent with a fair allocation among customers. A method should enable an EGS to calculate an individual customer's obligations from information in the possession of the customer, utilizing known algorithms and adjustment factors.

6. Load serving entities, utilities and EGSs, must cooperate. This includes sharing of information among market participants so as to provide a reasonable level of confidence that the above principles are being followed (individual customer data subject to regulatory restrictions on disclosure is not required to be shared with market participants).

7. The PJM OI will review methods and calculations for load, perform reconciliation functions (including appropriate scaling), and provide results to all load serving entities. PJM members will provide all requested information to the PJM OI to assist in that process.

8. Under these principles, the provisioning of obligation information to the PJM OI should be a ministerial function such that LSEs are indifferent to the particular entity with that responsibility.

INTERIM ARRANGEMENTS

For the period from January-May, 1999, it is agreed that PECO, PP&L and GPU will submit their proposed obligations to PJM.

With respect to the period beginning June 1, 1999, it is agreed that the Group will meet as frequently as possible to reach consensus on all subject matters, with the discussions to reflect the core principles set forth above.

Subject: RE: Draft principles for allocating ICAP/Tx obligations**Date:** Thu, 17 Dec 1998 15:39:29 -0500**From:** "Pratzon, D.J., (Dave)" <dpratzon@peco-energy.com>**To:** Stephen Huntoon <huntoon@home.com>

CC: "Falin, T.A., (Tom)" <tfalin@peco-energy.com>, "Reilly, C.C., (Carol)" <creilly@peco-energy.com>, "Fletcher, G.C., (Glenn)" <gfletcher@peco-energy.com>, "Scheidecker, P.G., (Paul)" <pscheidecker@exeloncorp.com>, "dkleppin@mwn.com" <dkleppin@mwn.com>, "kpreif@papl.com" <kpreif@papl.com>, "jane_lathrop@prea.com" <jane_lathrop@prea.com>, "laura.manz@pseg.com" <laura.manz@pseg.com>, "jmccormick@sel.com" <jmccormick@sel.com>, "jmerola@allegHENyenergy.com" <jmerola@allegHENyenergy.com>, "MBhavara@pseg.com" <MBhavara@pseg.com>, "pnatale@pseg.com" <pnatale@pseg.com>, "leonard.w.nowicki@bge.com" <leonard.w.nowicki@bge.com>, "jradman@pepco.com" <jradman@pepco.com>, "reynolj@pjm.com" <reynolj@pjm.com>, "rvaliga@pseg.com" <rvaliga@pseg.com>, "pjm-customer-choice@risc1.pjm.com" <pjm-customer-choice@risc1.pjm.com>, "dmason@gpu.com" <dmason@gpu.com>, "herling@pjm.com" <herling@pjm.com>, "tbitowf@gpu.com" <tbitowf@gpu.com>, "kirbyjw@pjm.com" <kirbyjw@pjm.com>, "ford@pjm.com" <ford@pjm.com>, "hinkelr@pjm.com" <hinkelr@pjm.com>, "paul.rychert@conectiv.com" <paul.rychert@conectiv.com>, "kjolin@delanet.com" <kjolin@delanet.com>, "deniseoca@aol.com" <deniseoca@aol.com>, "dgoulet@paoca.org" <dgoulet@paoca.org>, "jjwoodco@duke-energy.com" <jjwoodco@duke-energy.com>, "jmerola@allegHENyenergy.com" <jmerola@allegHENyenergy.com>, "gminer@gpu.com" <gminer@gpu.com>, "chub@conedsolutions.com" <chub@conedsolutions.com>, "miller@conedsolutions.com" <miller@conedsolutions.com>, "ppolacek@mwn.com" <ppolacek@mwn.com>, "bpschaefer@papl.com" <bpschaefer@papl.com>, "craig.evans@conectiv.com" <craig.evans@conectiv.com>, "gene.alessandrini@conectiv.com" <gene.alessandrini@conectiv.com>, "ntrask@pwrteam.com" <ntrask@pwrteam.com>, "fdjankowski@firstenergycorp.com" <fdjankowski@firstenergycorp.com>, "Carr, L.M., (Linda)" <lmcarr@exeloncorp.com>, "jhose@allegHENyenergy.com" <jhose@allegHENyenergy.com>, "jppolaha@papl.com" <jppolaha@papl.com>, "davis@dtenergy.com" <davis@dtenergy.com>, "katharine.olinchak@conectiv.com" <katharine.olinchak@conectiv.com>, "Kim, W.G. (William)" <wkim@peco-energy.com>

Steve - You're right, I agree with what I understand are the general concepts behind the list of principles that you have drafted on behalf of MAPSA. As I stated at an earlier WG meeting, my main concern when I first saw your list was that it was written with "code" words that could be interpreted as favoring one particular calculation protocol or disallowing another. Based on your statements, I do not believe this to be a problem.

When I look at your list of principles, here are the base concepts that I see:

Fairness - The allocation of peak load for ICAP and PJM Tx purposes must be fair to the customer and the customer's supplier, no matter whether that is the EDC or an alternate LSE. To this end, the PJM obligations associated with serving any individual customer should be the same, no matter which supplier that customer chooses. Further, the obligations for all of the customers in a zone should add up to the zonal total being allocated, so long as PJM obligations are based on such totals.

Straightforwardness - The calculations and embedded factors for determining the obligations for serving an individual customer should be available to all potential suppliers. Whenever possible, a supplier should be able to independently determine the obligations of a customer using these algorithms and specific data known by or available to the specific customer.

Balance - Calculation methods must strike a balance between ease of calculation and fairness of results.

Robustness - Calculation methods should make the best use of information available about an individual customer (e.g. hourly meter readings or registered demand information). Class average or load research data should augment but not totally replace use of more detailed customer-specific information.

Cooperation - The EDC and alternate LSEs must work together to develop and implement the necessary allocation algorithms. Given cooperation at this level, processes for transmitting data to PJM (currently by the EDC for all customers in its zone) or PJM obligation calculation methods (currently residual for the EDC) become clerical tasks rather than data control issues.

Auditability - To the extent that an EDC or alternate LSE must provide results to this process that are based on proprietary or business sensitive information, that party should be willing to submit its calculations to an independent audit, based on reasonable guidelines concerning notice and frequency. [I note that questions about who should perform any such audit, and who would pay for the audit are still open issues.]

This is what I see when I read your list of principles. I trust that my understanding matches yours, and that we can move on to discussions of specific calculation protocols at our meeting on 1/8/99. If we are not in alignment, you can let me know about any specific questions at our meeting in Wilmington tomorrow.

Dave Pratzon
>PECO Energy

PECO Energy Calculation Of Load for Installed Capacity

	STRATA TOTAL customers	**** Non-LPR customers	LPR customers	Strata Avg KW (Default)	Strata TOTAL KW
GS 1	27,971	27,963	8	3.06	85,591
GS 2	14,312	14,312		5.81	83,153
GS 3	17,069	17,069		9.03	154,133
GS 4	19,332	19,328	4	13.86	267,942
GS 5	9,405	9,403	2	22.99	216,221
GS 6	12,704	12,495	209	83.47	1,060,403
GS 7	27,947	27,947		0.24	6,707
GS 8	11,040	11,040		1.21	13,358
GS 9	5,105	5,105		2.14	10,925
OP 10	98,788	98,788		0	-
R 11	307,305	307,305		0.44	135,214
R 12	261,037	261,037		1.2	313,244
R 13	224,336	224,336		1.5	336,504
R 14	189,646	189,646		2.36	447,565
R 15	98,043	98,043		2.6	254,912
R 16	102,253	102,253		4.53	463,206
RH 41	108,131	108,131		3.72	402,247
RH 42	41,021	41,021		2.46	100,912
RH 43	7,043	7,043		5.85	41,202
OP 44	-	-		0	-
HT 51	20	-	20	6926.06	138,521
HT 52	103	1	102	4885.79	503,236
HT 53	75	-	75	7117.77	533,833
HT 54	69	-	69	4361.84	300,967
HT 55	491	257	234	671.2	329,559
HT 56	1,515	957	558	458.09	694,006
PD 57	533	494	39	196.58	104,777
PD 58	248	221	27	155.46	38,554
PD 59	93	82	11	284.36	26,445
PD 60	102	99	3	196.46	20,039
EP 61	41	-	41	501.5	84,048
SLE 70	429	429		0	-
SLS 71	383	383		0	-
SLP 72	-	-		0	-
POL 73	3,204	3,204		0	-
SL 74	-	-		0	-
TL 75	213	213		12.25	2,609
	1,590,007	1,588,605	1,402		7,170,034

***** Note: LPR customers with no metering data were treated as registered demand customers.

EP 61 was originally estimated at 91 MW total for the class

Diversified Planning Period Peak breakdown by Rate Schedules

PPL
12/18/98

		Summer Peak		Winter Peak	Div. Plan.
RTS	0.024127	139.5023	0.024127	154.4611	146.9817
RTD	0.000124	0.716968	0.000125	0.80025	0.758609
RS	0.419252	2424.115	0.419253	2684.058	2554.086
GS1	0.052457	303.3064	0.052457	335.8297	319.568
GS3	0.244047	1411.08	0.244042	1562.357	1486.718
GH	0.022091	127.7302	0.022089	141.4138	134.572
IS1	0.000000168	0.000971	0.000000182	0.001165	0.001068
LP4	0.125455	725.3808	0.125456	803.1693	764.2751
ISP	0.003825	22.11615	0.003826	24.49405	23.3051
LP5	0.067661	391.2159	0.067661	433.1657	412.1908
LP6	0.011745	67.90959	0.011743	75.17869	71.54414
IST	0.013835	79.99397	0.013835	88.57167	84.28282
LEP	0.011565	66.86883	0.011565	74.03913	70.45398
STL	0.002371	13.70912	0.002371	15.17914	14.44413
ISM	0.001334	7.713188	0.001332	8.527464	8.120326
BL	0.000111	0.641802	0.000123	0.787446	0.714624
Sum	1.00000	5782.0	1.00001	6402.0	6092.0

PP&L Zone DPPP	6439
UGI	-176
Wholesale	-171
PP&L DPPP	6092

Diversified Planning Period Peak Breakdown By Rate Schedules

PP&L

Load Profiles	Annual Kwh	Cust. Count	Class Avg Annual Kwh	Class Contribution to Div PPP(Mw)	Load Responsibility
					Factor for Profile (Kw per 10,000 kwh)
GRS & EXR	10,934,537,113	1,075,207	10,170	2554.80101	2.3365
RTS	390,815,203	14,858	26,303	147.74029	3.7803
GS1	1,453,804,526	124,578	11,670	319.56804	2.1982
GS3	5,765,024,931	20,315	283,782	1486.71832	2.5789
LP4	4,904,277,536	869	5,643,587	764.27506	1.5584
GH1	357,031,291	1,138	313,736	110.74191	3.1017
GH2	76,827,985	2,800	27,439	23.83006	3.1017
STL	166,508,121	1,112	149,738	14.44413	0.8675
				<u>5422.1</u>	

Hourly Meter	Kw @peak(*1)	Cust.Count	Class Contribution to DivPPP(Mw)
IS1	953	4	0.001068
ISP	60,281	42	23.30510
ISM	86,184	1	8.12033
IST	254,599	35	84.28282
LEP	12,710	1	70.45398
LP5	372,290	97	412.19081
LP6	54,956	4	71.54414
			<u>669.9</u>

*1 Zonal Peak occurred December 22, 1997 at 1800 hr.

6092.0

Transmission Service Responsibility Breakdown By Rate Schedules

PP&L

Load Profiles	Annual Kwh	Cust. Count	Class Avg Annual Kwh	Winter Peak Contribution	Percent Share Winter Peak	Class Contribution to Transmission Responsibility (mw)	Transmission Responsibility
							Factor for Profile (Kw per 10,000 kwh)
GRS & EXR	10,934,537,113	1,075,207	10,170	2684.845446	0.471252424	2273.118	2.0788
RTS	390,815,203	14,858	26,303	154.4611	0.027111493	130.774	3.3462
GS1	1,453,804,526	124,578	11,670	335.8297	0.058945874	284.329	1.9558
GS3	5,765,024,931	20,315	283,782	1562.357	0.27422976	1322.766	2.2945
LP4	4,904,277,536	869	5,643,587	803.1693	0.140974774	680.001	1.3865
GH1	357,031,291	1,138	313,736	116.3722	0.020426007	98.526	2.7596
GH2	76,827,985	2,800	27,439	25.0416	0.00439538	21.201	2.7596
STL	166,508,121	1,112	149,738	15.17914	0.00266429	12.851	0.7718
				5697.26	1.000000	4823.567	

Hourly Meter	Kw @peak(*1)	Cust.Count	Class Contribution to Transmission Responsibility (mw)
IS1	953	4	0.9558
ISP	60,281	42	60.4571
ISM	86,184	1	86.4358
IST	254,599	35	255.3429
LEP	12,710	1	12.7471
LP5	372,290	97	373.3778
LP6	54,956	4	55.1166
			844.433

*1 Zonal Peak occurred December 22, 1997 at 1800 hr.

PP&L Transmission Load Responsibility w/o UGI = 5835 Mw based on zonal peak.

PP&L Transmission Load Responsibility w/o UGI and Wholesale Load = 5668 Mw based on zonal peak.

5668.000

'98 Rate Class Cap Obligations
 (Time of GPUE Peak = July 22, 1998 at 5 PM)

Load Profile for each Rate Class				Rate Class	
Rate Class	Peak Load (kw's)	Loss Factor	Load w/Losses (kw's)	# Cust	Load w/Losses (MW's)
Met-Ed					
MRSNHW	RS, No Ht, No WH	1.93	2.069	245,811	508.57
MRSNH	RS with WH, No Ht	1.98	2.123	74,004	157.08
MRSHT	RS HT	2.39	2.562	35,158	90.08
MRTH	RT HT	2.11	2.262	53,852	121.81
MRTNH	RT No HT	2.48	2.659	12,210	32.46
MGSC	GS Comm	7.02	7.525	51,985	391.21
MGSI	GS Ind	29.90	32.053	1,592	51.03
MGSTC	GST Comm	347.10	372.091	261	97.12
MGSTI	GST Ind	360.02	385.941	192	74.10
MMS	MS	25.70	27.550	314	8.65
MGPC	GP Comm	730.08	757.093	163	123.41
MGPI	GP Ind	978.93	1015.150	242	245.67
MTPI	TP	11,859.28	12108.325	21	254.27
	Non-Rate Class Load	30,008.00	30008.000	n/a	30
Total				475,805	2,185

Penelec					
Rate Class	Peak Load (kw's)	Loss Factor	Load w/Losses (kw's)	# Cust	Load w/Losses (MW's)
PRSNHW	RS, No Ht, No WH	1.14	1.254	325,700	408.43
PRSNH	RS with WH, No Ht	1.24	1.364	107,608	146.78
PRSH	RS HT	1.66	1.826	33,737	61.60
PRTNH	RT No HT	1.73	1.903	8,907	16.95
PRTH	RT HT	1.23	1.353	19,180	25.95
PGSC	GS Comm	7.19	7.909	70,598	558.36
PGSI	GS Ind	28.13	30.943	2,238	69.25
PGSTC	GST Comm	424.95	467.445	237	110.78
PGSTI	GST Ind	388.62	427.482	188	80.37
PRATEH	Rate H	15.11	16.621	188	3.12
PGPC	GP Comm	624.47	666.934	154	102.71
PGPI	GP Ind	805.23	859.986	206	177.16
PLPC	LP Comm	2,497.49	2589.897	5	12.95
PLPI	LP Ind	5,920.69	6139.756	53	325.41
	Non-Rate Class Load	413,739.00	413739.000	n/a	413.739
Total				568,999	2,514

Penelec
Analysis of Sampling Error at Time of GPU System Peak
(July 22, 1998 at 5 PM, PN Load w/Losses = 2440 MW)

Class	Customers	Load Profiles		Total KW With Losses	Sampling Error		Generation Level	
		Load @ GPU KW/Cust	Zonal Peak With Losses		KW/Cust	%	Tot KW w/Losses	KW/Cust w/Losses
Load Profiled Rate Classes								
RS No Ht, No WH	325,700	1.14	1.25	407,125	0.05	4.4	390,011	1.20
RS WH, No Ht	107,608	1.24	1.36	146,347	0.06	4.4	140,178	1.30
RS HT	33,737	1.66	1.83	61,739	0.09	5.0	58,808	1.74
RT No HT	8,907	1.73	1.90	16,923	0.09	4.7	16,165	1.81
RT HT	19,180	1.23	1.35	25,893	0.06	4.3	24,827	1.29
GS Comm	70,589	7.19	7.91	558,359	0.35	4.6	533,677	7.56
GS Ind	2,238	28.13	30.94	69,244	1.36	4.6	66,196	29.58
GST Comm	237	424.95	467.45	110,786	20.67	4.6	105,888	446.78
GST Ind	188	388.62	427.48	80,366	18.89	4.6	76,814	408.59
Rate H	188	15.11	16.62	3,125	1.34	8.8	2,873	15.28
Subtotal				1,479,906		-4.59%	1,415,437	
Interval Metered Rate Classes								
							Metered Load	
GP Comm	154						95,420	
GP Ind	206						166,062	
LP Comm	5						12,900	
LP Ind	53						336,412	
Subtotal							610,794	
Non Load Profiled Rate Classes								
							Metered Load	
GS Space Heating	GS HT	1,969	(Note1)				11,494	
Street Lighting	St Ltg	1,066					0	
Outdoor Lighting	OL	3,951					0	
Traffic Signals	TS	15					30	
	Municipals + AEC	13					173,994	
	Borderline	15					116	
(for AEC)	Susquehanna						224,514	
	Raystown						0	
	Company Use						3,591	
Subtotal							413,739	
Total Penelec	574,050						2,439,970	

Note1: GSHT # of Customers not included in Total number of Customers (duplicate)

MetEd
Analysis of Sampling Error at Time of GPU System Peak
(July 22, 1998 at 5 PM, ME Load w/Losses = 2155 MW)

Class	# Customers	Load Profiles			Sampling Error		Generation Level	
		Load @ GPU Zonal Peak KW/Cust	W/Losses	Total KW W/Losses	KW/Cust	%	Tot KW w/Losses	KW/Cust w/Losses
Load Profiled Rate Classes								
RS No HT, No WH	245811	1.93	2.07	508,829				
RS WH, No HT	24004	1.98	2.12	156,888				
Total RS No HT	319815	1.94	2.08	665,215	-0.01	-0.7	669923	2.09
RS HT	35158	2.39	2.56	90,004	-0.03	-1.0	90958	2.59
RT No HT	12210	2.48	2.66	32,479	-0.02	-0.9	32773	2.68
RT HT	53852	2.11	2.28	121,706	-0.02	-1.0	122906	2.28
GS Comm	51985	7.02	7.53	391,447	-0.08	-0.7	394310	7.59
GS Ind	1592	29.9	32.05	51,024	-0.33	-1.0	51542	32.38
GST Comm	281	347.10	372.09	97,115	-4.41	-1.2	98266	378.50
GST Ind	192	360.02	385.94	74,100	-3.08	-0.8	74691	389.02
MS	314	25.70	27.55	8,651	-0.40	-1.4	8777	27.95
Subtotal				1,531,741		0.79%	1,544,144	
Interval Metered Rate Classes								
GP Comm	163						Metered Load 113744	
GP Ind	242						237362	
TP/QF Ind	21						229752	
Subtotal							580,858	
Non Load Profiled Rate Classes								
Class	# Customers						Metered Load	
QF Comm	4						437	
GS Space Heating	GS HT	940	(Note1)				9679	
Street Lighting	St Lig	584					0	
Outdoor Lighting	OL	1725					0	
	GS PSHL	155					0	
Traffic Signals	TS	28					6	
Fire Alarms	FL	2					1	
	Municipals	4					15881	
	Borderline	3					133	
	Company Use						3871	
Subtotal							30,008	
Total Met-Ed	478,310						2,155,010	

Note 1: GSHT # of Customers not included in Total number of Customers (duplicate)

PJM Capacity Credit Market

Welcome to the PJM Capacity Credit Market! This market allows suppliers to offer and buyers to purchase Capacity Credits.

The PJM Capacity Credit Market is administered by the Office of the Interconnection (OI) in accordance with the principles and procedures specified in Schedule 11 of the PJM Operating Agreement, effective October 15, 1998.

Prospective buyers/sellers of Capacity Credits submit Buy Bids/Sell Offers indicating the maximum amounts (MW) and prices (\$/MW-day) which they are willing to pay/receive for Capacity Credits for a given period of time. All Buy Bids and Sell Offers are confidential. PJM OI validates and processes Buy Bids and Sell Offers to clear the market at a Capacity Clearing Price. Notification is sent to inform a buyer/seller of a successful or unsuccessful Buy Bid/Sell Offer.

A Capacity Resource Availability Bulletin Board system is also available for prospective buyers and sellers of Capacity Credits to identify themselves in order to facilitate bi-lateral capacity transactions.

Announcements:

The following table summarizes the characteristics of the Load Obligation information and the applicable zonal diversity factors and reserve obligation for the Pennsylvania companies.

ZONE	Diversity Factor	Reserve Margin (%)
PN/ME	0.9814	19.75%
PECO	0.9815	20.54%
PP&L	1.0000	21.75%

These values for diversity factor and reserve margin will be utilized by PJM to convert customer peak load contribution information provided by the EDCs for each LSE into LSE Daily Obligation for each zone in which the LSE is serving load utilizing the formula:

$$\text{LSE Daily Obligation} = (\text{customer peak load contribution}) * (\text{Diversity Factor}) * (1 + \text{Reserve Margin})$$

For wholesale transactions which require the determination of a revised obligation calculation, the required changes will be determined on a case by case basis utilizing the most recent available load information and the business rules adopted by the Reliability Committee requiring that the zonal obligations remain constant.

Capacity Resource Availability Bulletin Board postings are now being accepted by PJM OI. To submit a posting, please review and follow the Capacity Resource Availability Bulletin Board Policy & Procedures.

The Capacity Credit Market for May 1, 1999-May 31, 1999 conducted on January 4, 1999 cleared 145 MW at a capacity clearing price of \$59.95/MW-day. Seven Buy-Bids were accepted for a total of 175 MW of Capacity Credits with bid prices ranging from \$54.15 to \$73.00/MW-day. Twenty-seven Sell Offers were accepted for a total of 731 MW of Capacity Credits with sell offer prices ranging from \$49.30 to \$90.00/MW-day.

An interim Monthly Capacity Credit Market for the month of February 1999 will be conducted on January 15, 1999. Capacity Credit Buy Bids/Sell Offers will be

accepted by the PJM OI from 7:00 a.m. until 10:00 a.m. on January 15, 1999 for this market. PJM anticipates that evaluation of this market will be completed on January 18, 1999, with market clearing results posted in summary format on January 18, 1999. To submit a Buy Bid or Sell Offer please review and follow the Interim Monthly Capacity Credit Market Policy & Procedure.

Additional Monthly Capacity Credit Markets will be conducted on the following dates:

Market Term	Market Date
February 1999	January 15, 1999
March 1999	January 19, 1999
April 1999	January 21, 1999
May 1999	January 25, 1999
June-Dec 1999	January 27, 1999

Capacity Resource Availability

- Capacity Resource Availability Bulletin Board Policy & Procedures
- Capacity Resource Availability Form
- Capacity Resource Availability

Capacity Credit Market

- Interim Monthly Capacity Credit Market Policy & Procedures
- Buy Bid/Sell Offer Form
- Capacity Credit Market Clearing Results
- Capacity Credit Market Statistics (Excel File) ←

[News](#) | [LMP Information](#) | [Market Monitoring Plan](#) | [Customer Choice](#)
[MAAC Seminar Announcement](#) | [Transmission Expansion Planning](#) | [PJM Home](#)

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a copy of the foregoing document, on behalf of Mid-Atlantic Power Supply Association, upon the persons named on the Official Service lists of Docket Nos. R-00973953, R-00973954, R-00974008 and R-00974009, and in the manner indicated below:

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Todd S. Stewart

Dated: January 20, 1999

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JOELLE K. OGG
KEVIN D. RYAN

February 19, 1999 **RECEIVED**

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TELECOPIER
(202) 429-8805

FEB 19 1999

James McNulty, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

RE: NorAm Energy Management, Inc.: Change of Company Name

Dear Secretary McNulty:

NorAm Energy Management, Inc. has recently changed its name to Reliant Energy Retail, Inc. Accordingly, please reflect this name change on all the official service lists in each of the following proceedings.

- Docket No. P-00981625: Petition of NorAm Energy Management, Inc. for a Declaratory Order, or, in the Alternative, a Petition for Amendment of Section 57.173 of the Public Utility Code
- Docket No. M-00960890: Interim Guidelines Regarding Notification by an
F.0013 Electric Generation Supplier of Operational Changes Affecting Customer Service and Contracts
- Docket No. M-00960890: Proposed Enrollment Procedures Applicable to
F.0014 Electric Distribution Companies and Electric Generation Suppliers During the Phased-In Implementation of Direct Access
- Docket No. M-00960890: Proposed Standards for Electronic Data
F.0015 Transfer and Exchange Between Electric Distribution Companies and Electric Generation Suppliers
- Docket No. L-00970126: Rulemaking Re: Customer Information Disclosure for Electric Providers
- Docket No. L-00970129: Rulemaking Re: Licensing Requirements for Electric Generation Suppliers

75

FROM: Joelle K. Ogg (202)429-8812
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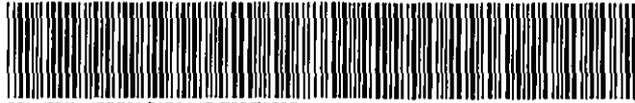
SHIPPER'S FEDEX ACCOUNT NUMBER



TO: James McNulty (717)787-1013
PA PUC
Commonwealth + North Sts
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SHIP DATE: 20FEB99
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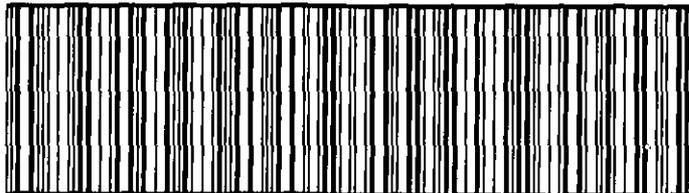
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- Docket No. L-00980136: Rulemaking Re: Amending Annual Resource Planning Report Filing Requirements
- Docket No. I-00980076: Year 2000 Compliance Questionnaire
- Docket No. I-00980078: Chapter 28 Electricity Generation Customer Choice and Competition Act; Capacity Issues Within the PJM Interconnection
- Docket No. R-00973953: Petition for Approval of PECO's Restructuring Plan
- Docket No. R-00973954: Application of Pennsylvania Power & Light Company for Approval of its Restructuring Plan
- Docket No. R-00973975: Application of UGI Utilities, Inc for Approval of its Restructuring Plan
- Docket No. R-00973981: Application of West Penn Power Company for Approval of its Restructuring Plan
- Docket No. R-00974008: Petition for Approval of Metropolitan Edison's Restructuring Plan
- Docket No. R-00974009: Petition for Approval of Pennsylvania Electric's Restructuring Plan
- Docket No. R-00974104: Application of Duquesne Light Company for Approval of its Restructuring Plan
- Docket No. R-00984298: Pennsylvania Public Utility Commission v. PECO Energy Company (Supplier Tariff Proceeding)

DOCKETED
FEB 25 1999

Please date-stamp and return the 2 additional copies in the enclosed envelope. If you have any questions concerning this matter, please do not hesitate to contact me.

Respectfully submitted,

Joelle Ogg

Douglas F. John, Esq.
Gordon J. Smith, Esq.
Joelle K. Ogg, Esq.

**DOCUMENT
FOLDER**

Counsel for Reliant Energy Retail, Inc.

cc: Keith Sappenfield
Janet Patrick
Service List

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February 21, 1999

038968

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
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DOCKETED
MAR 03 1999

Re: Application of PP&L to Approve
Restructuring Plan,
Docket No. R-00973954

RECEIVED
SECRETARY'S BUREAU
99 FEB 25 PM 9:33

Dear Mr. McNulty:

This letter is an update on the status of the Sustainable Energy Fund ("SEF"), created by paragraph E.5 of the Joint Petition for Full Settlement.

The Joint Petition, paragraph E.5, calls for a seven-member board "to be nominated by the Joint Petitioners and approved by the Commission." I have been working with many of the parties to implement this section of the Joint Petition and I would like to share with you the nominations for the Board of Directors:

1. Brian Nagle, PP&L Inc.
2. Karen O'Neil, Green Mountain Energy Resources
3. Crag Onori, Lucent Technologies
4. Alan Jennings, Community Action Committee of the Lehigh Valley
5. Eric J. Epstein, EFMR Monitoring Group
6. Jack R. Leshner, CPA
7. Marcus B. Sheffer, Energy Opportunities

This list was circulated to all of the parties in the proceeding in a letter dated January 15. Any party objecting to any of these nominations was asked to notify me.

kl

Nominations for the Board of Directors for the PP&L Sustainable Energy Fund
February 21, 1999
Page two

PP&L, in a letter dated January 25, 1999, replied that they take no position on the nominations.

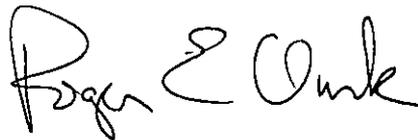
The PUC's Bureau of CEEP stated that they wished to be made a member of the Board, but have since withdrawn that request.

No other party responded to my nomination letter of January 15, 1999.

I hereby request the Commission to accept these nominations and to approve these persons as the Board of Directors of the Sustainable Energy Fund for the PP&L service territory.

A copy of this document has been served on all parties of record as shown on the attached certificate of service.

Sincerely,

A handwritten signature in black ink that reads "Roger E. Clark". The signature is written in a cursive, flowing style.

Roger E. Clark
Attorney for the Environmentalists

Copies: All parties of record
Honorable John Quain
Honorable Robert Bloom
Honorable David Rolka
Honorable Nora Mead Brownell
Honorable Aaron Wilson, Jr.
Office of Special Assistants

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of PP&L to Approve : Docket No. R-00973954
Restructuring Plan :

CERTIFICATE OF SERVICE

I hereby certify that I have served the attached letter to the Secretary dated February 21, 1999 containing nominations to the Sustainable Energy Fund to the following persons by first class mail on February 21, 1999:

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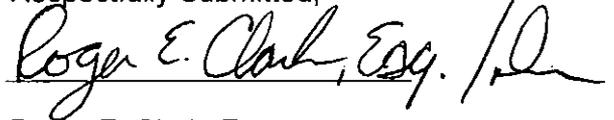
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Respectfully Submitted,

Handwritten signature of Roger E. Clark, Esq. in cursive script.

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Date: February 21, 1999

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March 12, 1999

ORIGINAL

James J. McNulty, Secretary
Pennsylvania Public Utility Commission
Room B20, North Office Building
Harrisburg, PA 17105-3265

**Re: Pennsylvania Power & Light Company - Sustainable Energy Fund
Docket No.: R-00973954**

Dear Mr. McNulty:

Pursuant to your March 11, 1999 telephone conversation with my paralegal, I am herewith enclosing the original and ten (10) copies of my Notice of Appearance with attached Certificate of Service in the matter docketed to the above number. Kindly include the original Notice in your file on this matter, mark the copies "filed", and return one (1) copy to me in the self-addressed, stamped envelope which is provided for your convenience. Please note that I have specifically requested that copies of all documents hereafter issued or filed in this matter be sent to me, as well as to the Commission on Economic Opportunity's Executive Director, Eugene Brady.

By a copy of this letter, I am serving a true and correct copy of the enclosed Notice of Appearance and Certificate of Service on all other participants in this matter or on their counsel, as indicated hereafter.

Your cooperation and assistance is greatly appreciated. However, feel free to contact me if you have any questions or require anything further.

Very truly yours,



DAVID E. KOFF

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99 MAR 15 AM 8:32

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Enclosures

cc: w/encl: Eugene Brady, Executive Director - CEO

See attached list

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ORIGINAL

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania Power & Light Company for Approval of its Restructuring Plan Under Section 2806 of the Public Utility Code, et al. : : Docket No. R-00973954

NOTICE OF APPEARANCE

DOCKETED
MAR 15 1999

Please enter my appearance in the above-designated matter on behalf of the Participant, the Commission on Economic Opportunity ("CEO"). I hereby certify that I am authorized to accept service on behalf of said Participant in this matter.

On the basis of this Notice, I hereby request that a copy of each document hereinafter issued by the Pennsylvania Utility Commission and/or filed by any other Participant in this matter be served on (i) the undersigned, at the address set for below, as well as on (ii) Eugene Brady, Executive Director of CEO, at 165 Amber Lane, Wilkes-Barre, PA 18703-1127.

Respectfully submitted,

KOFF, WENDOLOWSKI, FERGUSON
& MANGAN, P.C.

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CERTIFICATE OF SERVICE

I, DAVID E. KOFF, counsel for the Commission on Economic Opportunity in the within
action, hereby certify that on the 12th day of March, 1999, I served a true and correct copy of the
foregoing Notice of Appearance on all other Participants in this action or on their counsel, as
appropriate, by depositing the same in the United States mail, first class mail, postage pre-paid,
addressed to them as indicated on the service list attached hereto.



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