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File #: 126931

May 28, 2015

***VIA ELECTRONIC FILING***

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

**Re: Petition of Duquesne Light Company for an Extension of Time or Waiver to Meet  
Certain Regulatory Requirements  
Docket No. P-2015-**

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Dear Secretary Chiavetta:

Attached please find the Petition of Duquesne Light Company ("Duquesne Light") for an Extension of Time and/or Waiver to Meet Certain Regulatory Requirements. In the Petition, Duquesne Light requests an extension of time and/or waiver to implement the following regulatory requirements: (1) to remit actual bill amounts to electric generation suppliers ("EGSs") for residential customers that are on budget billing; (2) to provide a joint bill with suppliers; (3) to provide EGSs with bill ready capability; (4) to implement a Time-of-Use Program; and (5) to file the Company's Phase I implementation and cost benefit analysis for enhanced outage communication and voltage monitoring functionality.

Duquesne Light is serving a copy of this Petition on all parties that participated in the proceedings where each regulatory requirement was either agreed to by Duquesne Light or mandated by the Pennsylvania Public Utility Commission. Duquesne Light is also serving a copy of the Petition on all active EGSs in its service territory.

Respectfully submitted,

Anthony D. Kanagy

ADK/skr

Enclosure

cc: Certificate of Service

## CERTIFICATE OF SERVICE

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

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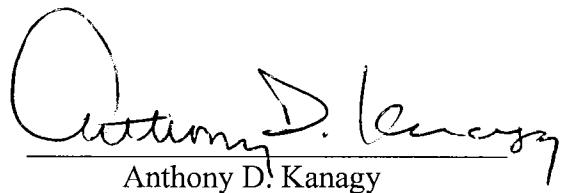
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Date: May 28, 2015

  
Anthony D. Kanagy

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Petition of Duquesne Light Company For :  
An Extension of Time And/Or Waiver To : Docket No. P-2015-\_\_\_\_\_  
Meet Certain Regulatory Requirements :**

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**PETITION OF DUQUESNE LIGHT COMPANY  
FOR AN EXTENSION OF TIME AND/OR WAIVER  
TO MEET CERTAIN REGULATORY REQUIREMENTS**

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**I. INTRODUCTION**

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code § 5.43 for an extension of time and/or waiver, and requests all necessary amendments of orders and waivers of regulations, with respect to the following regulatory obligations: (1) to remit actual bill amounts to electric generation suppliers (“EGSs”) for residential EGS customers that are on budget billing; (2) to provide a joint bill with suppliers; (3) to provide EGSs with bill ready capability; (4) to implement a Time of Use (“TOU”) program on June 1, 2015<sup>1</sup>; and (5) to file its Phase 1 implementation and cost benefit analysis for enhanced outage communication and voltage monitoring functionality. As explained in more detail below, implementing these new capabilities with the Company’s FOCUS System also must be prioritized against the needs of the Automated Metering Infrastructure (AMI) program, as well as improving efficiencies and addressing challenges from FOCUS after go-live which includes new defects which must be addressed after the introduction of any new code (“FOCUS Day 2 Projects”). Moreover, these

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<sup>1</sup> The Company also has a regulatory obligation to implement its Phase II Off-Cycle Switching (“Phase II OCS”) solution by July 31, 2015. Duquesne Light will not be able to meet this deadline for implementing Phase II OCS. At this time, the Company is continuing to investigate options for implementing Phase II OCS. Duquesne Light will be filing a subsequent Petition with the Commission requesting an extension of time and/or waiver to implement the Phase II OCS solution.

Pennsylvania regulatory requirements require significant information technology (“IT”) development and testing to ensure that each capability works correctly and does not disrupt existing operations, including customer billing and data exchange with EGSs. Approval of this Petition is necessary to grant the Company reasonable time to design, test and validate the system changes to comply with these regulatory requirements.

**II. BACKGROUND**

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

2. Duquesne Light’s attorneys are:

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

### **III. EXPLANATION OF REQUEST FOR EXTENSION OF TIME**

#### **A. EXPLANATION OF INFORMATION TECHNOLOGY CONSTRAINTS**

3. On November 28, 2014, the Company went live with a new Oracle-based technology suite referred to as the FOCUS Project or FOCUS System. The FOCUS System is a complex and multifaceted technology implementation that affected how the Company interacts and serves our customers on a day to day basis and impacted virtually every aspect of Duquesne Light's business and the service provided to customers. Although collectively coined the FOCUS System, the project included the upgrade, implementation and integration of several major systems such as a new Customer Care & Billing ("CC&B") system, a new Service Oriented Architecture<sup>2</sup>, Meter Data Management system, Workforce Management system, Market Transaction Messages and Interactive Voice Response, among other things.

4. The FOCUS Project impacted a significant and broad range of the Company's utility operations, including customer billing, meter data management, workforce management and transactional matters with EGSs. As is common with new and complex IT systems, a significant number of FOCUS Day 2 Projects also are awaiting implementation to resolve customer and EGS issues, eliminate manual work-arounds and improve efficiencies. In addition, the Company must maintain the stability of the FOCUS System<sup>3</sup> so as to not negatively impact customers and EGSs, and therefore, must be prudent when introducing any changes.

5. Implementing the regulatory requirements listed herein also must be prioritized with the Company obligations related to the AMI program. The Focus Day 2 Projects, the Pennsylvania regulatory requirements and the AMI program all will require additional and

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<sup>2</sup> The Service Oriented Architecture System enables components of the Oracle Utilities applications to communicate in a standardized fashion with other legacy applications over a secured network.

<sup>3</sup> In addition, the Company must perform normal maintenance of the FOCUS System, including updates to normal security driven software, process upgrades, physical plant maintenance, and patch applications.

significant IT modifications to the FOCUS System, including substantial testing to ensure that each additional capability works correctly and does not disrupt existing operations, including but not limited to customer billing and data exchanges with EGSs.

6. In order to maximize efficiency, the Company has developed an implementation schedule or “Road Map” to implement AMI, FOCUS Day 2 Projects and known regulatory initiatives through 2016<sup>4</sup>. The Road Map prioritizes those changes in a schedule to optimize design, testing and implementation among and between each modification to ensure the linkage between each modification is accomplished. In addition, the Company is providing a chart that shows the planned milestones, by quarter, for achieving the implementation schedule set forth in the Road Map. A copy of the Road Map is provided as Appendix A and a copy of the Planned Milestones by Quarter is provided as Appendix B. The Road Map also reflects the schedule for implementing functionality related to AMI over the next year. Smart meter functionality is another important regulatory obligation that the Company needs to implement during the timeframe covered by the Road Map. Finally, the Road Map identifies releases related to FOCUS Day 2, and change requests (CRs).

7. The following guidelines were used to develop the release schedule set forth on the Road Map:

- a) Provide additional and/or improved functionality to stakeholders while minimizing the risk of introducing defects that would negatively impact or destabilize the FOCUS System.
- b) Predecessor/successor relationships among functionalities were evaluated for each release, and earlier releases are designed to provide a foundation for subsequent

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<sup>4</sup> Phase II OCS is not included in the Road Map as explained in footnote 1.

releases. For example, the Oracle 2.4 upgrade to the FOCUS System<sup>5</sup> provides a rate engine that is needed for a TOU rate offering and can also better support a Bill Ready model for suppliers offering various pricing structures to customers.

- c) Code management and deployment opportunities were maximized to enable groupings of similar changes in order to increase development and testing efficiencies (e.g. Release 4.0 Joint Bill provides the foundation for the release 6.0 Bill Ready functionality which will be leveraged by EGSs in the 2016 TOU pilot program).
- d) Planned vendor software upgrades were leveraged to maximize resources and minimize code changes to the FOCUS System.
- e) The avoidance of implementing multiple releases at the same time and the allowance of time between each release to fix any defects from the new functionality. By managing the number of changes being made to the code at one time, the Company will be able to more quickly identify whether new capabilities are creating unintended issues. Thus, the Company will introduce functionality in a sequential manner, allowing releases to be the foundation for future releases, which is why the Road Map shows the releases occurring over time.
- f) The degree to which foundational code changes are made substantially impacts the duration of testing as well as increases the cycles of testing required to confirm system stability, as each new release provides additional functionality the duration of testing increases as well as the cycles of testing required to confirm system stability and to ensure that day to day processes are working correctly.

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<sup>5</sup> The Oracle 2.4 Upgrade is an update to the base Oracle products which Oracle required as part of its ongoing system support.

8. Each new capability will require multiple rounds of testing in order to ensure that the new changes fully meets the regulatory requirements and function as designed without any negative impacts to the existing production environment.

9. Stabilization periods also have been included in the timeline for each release set forth on the Road Map to allow for confirmation that existing production environments have not been compromised and to enable focused attention on issue resolution in a live production environment.

10. In the following subsections of this Petition, Duquesne Light addresses each of the regulatory requirements for which it is requesting a waiver or an extension and the date on which it expects to be able to comply. Duquesne Light notes that each release and milestone is dependent upon the prior release (or milestone) being implemented on time. Therefore, it is possible that the schedule set forth herein could be delayed. Duquesne Light proposes to provide the Commission with quarterly updates (within 30 days after the end of each quarter) regarding the status of each milestone. In the event that the Company experiences additional delay in implementing these capabilities beyond the dates set forth in this Petition, the Company may be forced to file a subsequent petition(s) with the Commission explaining the reasons for the delay and requesting additional time to meet the applicable regulatory requirement.

**B. SPECIFIC EXTENSION REQUESTS**

**1. Actual Remittance Of Monthly Bill Amounts To EGSs For EGS Customers On Budget Billing**

11. Historically, the Company has paid EGSs the same monthly bill amount that is charged to customers. Therefore, if an EGS residential customer was on budget billing, Duquesne Light bills the budget amount to the EGS customer and pays the EGS the applicable portion of the budgeted amount.

12. In Duquesne Light's Default Service Plan VI ("DSP VI") proceeding, the Company agreed to pay EGSs actual monthly charges that would have been billed to EGS customers but for budget billing ("actual monthly bill amounts") as soon as Duquesne Light was able to implement the necessary IT changes after FOCUS System became operational. *Petition of Duquesne Light Company for Approval of a Default Service Program and Procurement Plan for the Period June 1, 2013 through May 31, 2015*, Docket No. P-2012-2301664, Order entered January 25, 2013 ("*DSP VI Order*", p. 240).<sup>6</sup> The Commission agreed with this proposal. *DSP VI Order*, p. 241.

13. System changes will be necessary to adjust the algorithm in the CC&B system to select the actual versus budget charges, remove the true-up access code in CC&B, amend customer letters, and modify reporting functions.

14. Under the Road Map, Duquesne Light expects to be able to implement the capability to pay EGSs actual monthly bill amounts, as opposed to budget bill amounts, by September 30, 2015.

15. Therefore, Duquesne Light respectfully requests an amendment of the *DSP VI Order*, to the extent necessary, to implement this capability by September 30, 2015.

## **2. Joint Bill Capability**

16. On May 23, 2014, the Commission issued its Final Order regarding EDC and EGS joint billing. *Investigation of Pennsylvania's Retail Electricity Market: Joint Electric*

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<sup>6</sup> At the time of the DSP VI Proceeding, the Company's scheduled FOCUS implementation date was in 2013. In the DSP VI Proceeding, the Company stated that it would take several months after the FOCUS System was operational to implement the actual remittance capability. Therefore, the Company requested that the Commission allow Duquesne Light to continue paying EGSs the budget bill amounts until January 2014, or as soon thereafter, as Duquesne Light was able to implement IT changes. *DSP VI Order*, p. 240. The FOCUS System was delayed until November 28, 2014 due to installation and IT complications which have also delayed the ability to pay EGSs based on actual monthly billed kWh amounts as opposed to budget bill amounts.

*Distribution Company – Electric Generation Supplier Bill*, Docket No. M-2014-2401345 (“*Joint Bill Order*”).

17. In the *Joint Bill Order*, the Commission directed EDCs to implement Joint Bill changes by June 1, 2015. The Joint Bill changes include: (1) the inclusion of the EGS’s logo on the EDC bill; (2) the expansion of EGS bill messaging space from two (2) to four (4) lines with up to 80 characters each; and (3) the inclusion of a Shopping Information Box. *Joint Bill Order*, p. 39.

18. Implementing the Joint Bill requirements will require bill print modifications to the Company’s FOCUS System, as well as additional programming and testing for Duquesne Light Disaster Recovery<sup>7</sup> bill print vendor. These changes will require a redesign of the supplier section of the bill to include the EGS Logos, Shopping Box and Supplier messaging as well as additional bill printing flexibility to allow for multiple EGS switches when the Company implements Phase II OCS. Due to the timing for go-live of the FOCUS System and the prioritization by the Company to implement its Phase I OCS Solution, the Company will not be able to implement the Joint Bill capability by June 1, 2015.

19. Under the Road Map, Duquesne Light expects to be able to implement the Joint Bill requirements by December 31, 2015.

20. Therefore, Duquesne Light respectfully requests an extension of time, and a waiver of the application of *Joint Bill Order* at Docket No. M-2014-2401345, permitting the Company to implement the Joint Bill requirements by December 31, 2015.

### **3. Bill Ready Capability**

21. If the EGS does not want to bill its charges to the customer directly, then the Company currently requires EGSs to provide rates for supply service to the Company which the

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<sup>7</sup> This vendor can print customer bills in the event that Duquesne Light’s bill printing capability is compromised.

Company uses to calculate supply charges to present on the Company's bill. This is referred to as Rate Ready.

22. On December 6, 2012, the Commission entered an Order requiring EDCs to include a plan for implementing Bill Ready and dual billing functionalities in their smart meter plans. Bill Ready requires the Company to provide consumption data to the EGS and allows the EGS to provide the supply bill calculation back to the Company for presentation on the Company's bill.

23. On April 5, 2013, Duquesne Light made a supplemental smart meter filing with the Commission. Therein, the Company explained that its current systems provided dual-billing functionality but could not support Bill Ready functionality. The Company further proposed to implement Bill Ready functionality in 2015<sup>8</sup>. *Smart Meter Procurement and Installation*, Docket No. M-2009-2092655.

24. On July 2, 2013, the Commission issued a Secretarial Letter accepting the Company's supplemental filing.

25. Implementing the Bill Ready capability will require multiple changes to the FOCUS System. Moreover, the Oracle 2.4 upgrade in Release 3.2 on the Road Map is needed to provide a more efficient rate engine to support the Bill Ready model. The Company must revise the FOCUS System to ensure that the correct account number and usage are provided to the supplier and to allow for pricing information to be seamlessly included on the customer's bill. Further, the system must be built to accommodate estimated reads and the ability for a supplier to cancel and re-bill, which also must be synced with Company changes to the bill. Finally,

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<sup>8</sup> At the time of the April 5, 2013 filing, the Company expected to complete the implementation of the FOCUS System in December 2013.

changes in business processes and EDI transactions will need to be made to accommodate Bill Ready. These revisions to the FOCUS System are very complex.

26. Under the Road Map, Duquesne Light expects to be able to implement Bill Ready capability by May 31, 2016.

27. Therefore, Duquesne Light respectfully requests an extension of time, and an amendment of the Commission's July 2, 2013 Secretarial Letter at Docket No. M-2009-2092655, to implement the Bill Ready capability by May 31, 2016.

#### **4. Time of Use Program**

28. In Duquesne Light's Default Service Plan VII ("DSP VII") proceeding at P-2014-2418242, the Company agreed to initiate a limited TOU program commencing June 1, 2015 for Residential customers that have smart meters and Small C&I and Medium C&I customers with interval meters, "as long as the customer has the necessary data collection and communications systems in place and the systems have been successfully tested." Stipulation at P-2014-2418242. The TOU program proposed by the Company for the first year of the DSP VII period was approved by the Commission and provided for a Request for Proposal process to select a single EGS to provide TOU service to a limited number of customers for the summer of 2015.

29. The Company also committed to certain TOU Plan Schedule and reporting requirements at Docket No. P-2009-2149807. Therein, the Commission authorized the Company to delay TOU implementation until June 1, 2015 and to delay reporting requirements until November 16, 2016. See *Petition of Duquesne Light Company for Approval to Modify its TOU Plan and Reporting Requirements*, Docket No. P-2009-2149807, Order entered August 15, 2013.

30. Likewise, in the Company's Smart Meter proceeding, the Company proposed to implement TOU capability in 2015. *Petition of Duquesne Light Company for Approval of its*

*Final Smart Meter Procurement and Installation Plan*, Docket No. M-2009-2123948, Order approving Settlement entered May 6, 2013.

31. The delays in implementing the FOCUS System have resulted in delays in completing the installation of communication systems to receive information from smart meters that preclude the Company from implementing the approved TOU program during the summer of 2015.

32. Even if Duquesne Light had been able to implement a TOU program on June 1, 2015, as a practical matter, it would have been a very limited program. The Company estimates that it will have approximately 48,000 meters installed by June 1, 2015 that are capable of recording usage on an hourly basis and able to communicate data to the Company.<sup>9</sup> Other EDCs have experienced TOU participation rates of 1-2%. If Duquesne Light experienced similar TOU participation rates, this would translate to less than 1,000 customers.

33. With such insignificant participation rates, the load from 2 pm to 6 pm for a four month period (June to September) was not likely to attract much, if any, EGS participation to provide TOU service for 2015. In addition, one of the goals of the TOU program is to get sampling data to evaluate customers' behavior regarding shifting load. With such a small sample size, it is likely there would not be sufficient data to achieve valid test results.

34. The Stipulation in the DSP VII proceeding also provides for a collaborative "to develop a TOU program and cost recovery mechanism for the year commencing June 1, 2016 and ending May 31, 2017"<sup>10</sup>, to identify ways to permit multiple EGSs to participate in TOU

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<sup>9</sup> The Company does have certain Small and Medium C&I customers with interval meters. However, the Company does not have the capability or capacity to allow interval data to be used for a TOU program. The current system can only handle the interval reads necessary for customers who are on hourly priced service and the Company cannot expand the use of that system for small and medium C&I customers without risk. In addition, the current system does not allow for presentment of the interval data.

<sup>10</sup> The scope of the TOU program will be determined during the collaborative but the assumption is that an on-peak and off-peak price will only be offered during the summer months.

offering(s).” Stipulation, pages 3-4. Duquesne Light will commence the TOU collaborative in the summer of 2015, to prepare for the TOU 2016 program.

35. Duquesne Light expects to have the necessary communications equipment and other systems installed and tested to read smart meters by June 1, 2016. In addition, the Company anticipates having approximately 200,000 meters installed that will be capable of recording usage on an hourly basis. This increase in eligible customers should both encourage EGSs to participate in the TOU program and provide sufficient data to validate testing results.

36. Therefore, Duquesne Light respectfully requests an extension of time and/or waiver, and an amendment of the Commission’s January 25, 2015 order at Docket No. P-2014-2418242, the August 15, 2013 Order at P-2009-2149807 and the Company’s Smart Meter Plan at Docket No. M-2009-2123948 to implement a TOU program to become effective June 1, 2016 and to report back to the Commission regarding the program by no later than November 30, 2016.

**5. Outage Communication and Voltage Monitoring Phase I Study**

37. On May 6, 2013, the Commission entered its Opinion and Order (“*May 6 Order*”) granting the Petition of Duquesne Light for Approval of its Final Smart Meter Procurement and Installation Plan (“Final Smart Meter Plan”). The Commission directed Duquesne Light to make a compliance filing within 90 days of the *May 6 Order* specifying its proposed changes to settlements and profile processes and providing data supporting whether or not inclusion of the voltage monitoring and communication of outages and restorations capabilities are cost effective.

38. On August 2, 2013, the Company made a compliance filing as required by the *May 6 Order*. In its compliance filing, the Company indicated that it planned to implement outage communication and voltage monitoring capabilities in three phases. Phase I is the Strategic Development Phase. Phase I of the project will include a more detailed study of

distribution operations processes and technology, data collection as well as an implementation roadmap. Phase II would focus on implementation of advanced outage capabilities and Phase III will focus on distribution applications.

39. Based on the results of Phase I, the Company is required to provide the Commission and interested parties with its implementation roadmap including specific capabilities supporting technology recommendations and refined cost-benefit information by the 2<sup>nd</sup> quarter of 2015.

40. The Company has completed its request for proposal (“RFP”) and received bids to conduct the Phase I Study from multiple vendors. A vendor has been selected and the study is currently underway and scheduled for completion June 1, 2015.<sup>11</sup> To thoughtfully review the study and address any issues with the vendor, and in an abundance of caution, the Company is respectfully requesting a 30 day extension to file the results of the Phase I Study and implementation roadmap by July 31, 2015.

#### **IV. CONCLUSION**

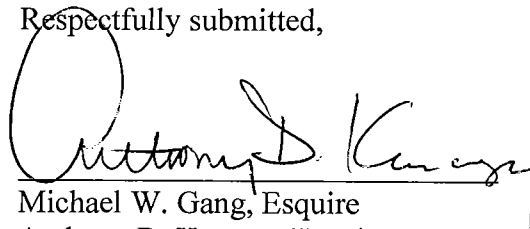
WHEREFORE, for the foregoing reasons, Duquesne Light Company respectfully requests: (1) an extension of time until September 30, 2015, and an amendment of the *DSP VI Order* at Docket No. P-2012-2301664 to implement remittance of actual bill amounts to electric generation suppliers for EGS customers that are on budget billing; (2) an extension of time until December 31, 2015, and a waiver of the *Joint Bill Order* at Docket No. M-2014-2401345 to implement the Joint Bill requirements; (3) an extension of time until May 31, 2016, and an amendment of the July 2, 2013 Secretarial Letter in the Company’s smart meter proceeding at Docket No. M-2009-2092655 to implement bill ready capability; (4) a waiver and an extension of time until June 1, 2016, and an amendment to the DSP VII Settlement and Order approving

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<sup>11</sup> The Company committed to filing its Phase I roadmap by June 30, 2015.

the Settlement at Docket No. P-2014-2418242, the Commission's Order at Docket No. P-2009-2149807 and the Company's Smart Meter Plan at Docket No. M-2009-2123948 to implement a TOU program; (5) an extension of time until July 31, 2015, and an amendment to the May 6 Order to provide the Phase 1 implementation and cost benefit analysis for enhanced outage communication and voltage monitoring functionality; and (6) any other waiver or amendment of Orders or Regulations necessary for the relief requested herein. In addition, as explained above, if the Company experiences additional delay in implementing these capabilities beyond the dates set forth in this Petition, the Company may need to file a subsequent petition(s) with the Commission explaining the reasons for the delay and requesting additional time to meet the regulatory requirement(s).

Respectfully submitted,



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Date: May 28, 2015

Attorneys for Duquesne Light Company

# Appendix A

**Exhibit A**

**Road Map**

Release*	2015												2016					
	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J
Release 3.0: AMI & Focus Day 2 Items	█																	
Release 3.1: Actual Remit, Contingency Reads, CR's & Focus Day 2 Items	█																	
Release 4.0: Joint Bill, CR's & Focus Day 2 Items	█																	
Release 4.1: End of Year & FOCUS Day 2 Items							█											
Release 3.2: CC&B Version 2.4 Upgrade		█																
Release 5.0: Bill Ready, FOCUS Day 2 Items & TOU	█												█					
Release 6.0: Seamless Move, Instant Connect & FOCUS Day 2 Items	█																	

## Appendix B

Exhibit B

Planned Milestones by Quarter for Regulatory Initiatives

ACTUAL REMITTANCE

WORK PLAN PHASES	2015				2016		
	Q1	Q2	Q3	Q4	Q1	Q2	Q3
ANALYSIS PHASE	XXX						
DESIGN PHASE	XXX	XXX					
DEVELOPMENT/BUILD PHASE		XXX					
TEST PHASE		XXX	XXX				
DEPLOY – No later than September 30, 2015			XXX				

JOINT BILL

WORK PLAN PHASES	2015				2016		
	Q1	Q2	Q3	Q4	Q1	Q2	Q3
ANALYSIS PHASE	XXX	XXX					
DESIGN PHASE		XXX					
DEVELOPMENT/BUILD PHASE		XXX	XXX				
TEST PHASE			XXX	XXX			
DEPLOY – No later than December 31, 2015				XXX			

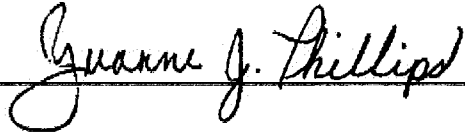
BILL READY

WORK PLAN PHASES	2015				2016		
	Q1	Q2	Q3	Q4	Q1	Q2	Q3
ANALYSIS PHASE	XXX						
DESIGN PHASE			XXX				
DEVELOPMENT/BUILD PHASE			XXX	XXX			
TEST PHASE				XXX	XXX	XXX	
DEPLOY – No later than May 31, 2016						XXX	

## VERIFICATION

I, Yvonne J. Phillips, being Manager, Customer Regulatory Initiatives for Duquesne Light Company ("Duquesne Light"), hereby state that the facts set forth in the foregoing Petition of Duquesne Light Company For an Extension of Time and/or Waiver to Meet Certain Regulatory Requirements are true and correct to the best of my knowledge, information and belief and that I expect Duquesne Light to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: May 28, 2015

  
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