



17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
717-731-1970 Main
717-731-1985 Main Fax
www.postschell.com

Michael W. Gang

mgang@postschell.com
717-612-6026 Direct
717-731-1985 Direct Fax
File #: 160549

July 2, 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 and All Necessary
Waivers to Implement Its Phase II Off-Cycle Switching Solution
Docket No. P-2015-**

Dear Secretary Chiavetta:

Attached please find the Petition of Duquesne Light Company ("Duquesne Light") for an Extension of Time and All Necessary Waivers to Implement Its Phase II Off-Cycle Switching Solution. Copies will be provided as indicated on the Certificate of Service.

Respectfully submitted,

Michael W. Gang

MWG/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).

VIA FIRST CLASS MAIL

Richard A. Kanaskie, Esquire
Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
PO Box 3265
Harrisburg, PA 17105-3265

Sharon E. Webb, Esquire
Office of Small Business Advocate
300 North Second Street, Suite 202
Harrisburg, PA 17101

David T. Evrard, Esquire
Assistant Consumer Advocates
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923

Todd S. Stewart, Esquire
William E. Lehman, Esquire
Hawke, McKeon & Sniscak LLP
100 N. 10th Street
PO Box 1778
Harrisburg, PA 17101

Vincent A. Parisi
IGS Energy
6100 Emerald Parkway
Dublin, OH 43016

Gary A. Jeffries, Esquire
Assistant General Counsel
Dominion Retail, Inc.
501 Martindale Street, Suite 400
Pittsburgh, PA 15212-5817

Charles E. Thomas, III, Esquire
Thomas T. Niesen, Esquire
Thomas, Niesen & Thomas
212 Locust Street, Suite 600
PO Box 9500
Harrisburg, PA 17108-9500

Brian J. Knipe, Esquire
76 S. Main Street
Akron, OH 44308

Amy M. Klodowski, Esquire
FirstEnergy Solutions Corp.
800 Cabin Hill Drive
Greensburg, PA 15601

Brian R. Greene, Esquire
Greene Hurlocker, PLC
1807 Libbie Avenue, Suite 102
Richmond, VA 23226

Victor P. Stabile, Esquire
Dilworth Paxton LLP
112 Market Street, 8th Floor
Harrisburg, PA 17101

Harry S. Geller, Esquire
Elizabeth R. Marx, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Stephen L. Huntoon, Esquire
NextEra Energy Resources, LLC
801 Pennsylvania Avenue, N.W., Suite 220
Washington, DC 20001

Pamela C. Polacek, Esquire
Teresa K. Schmittberger, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
PO Box 1166
Harrisburg, PA 17108-1166

David P. Zambito, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

Heather M. Langeland, Esquire
Citizens for Pennsylvania's Future
200 First Avenue, Suite 200
Pittsburgh, PA 15222

Robert Altenburg, Esquire
Citizens for Pennsylvania's Future
610 North Third Street
Harrisburg, PA 17101

Thomas J. Sniscak, Esquire
Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

Michael A. Gruin, Esquire
Stevens & Lee
17 North Second Street
16th Floor
Harrisburg, PA 17101

Paul E. Russell, Esquire
PPL Electric Utilities Corporation
2 North Ninth Street
Allentown, PA 18101

Mark C. Morrow, Esquire
UGI Corporation
460 North Gulph Road
King of Prussia, PA 19406

Frank Caliva, III
Strategic Communications LLC
1012 14th Street NW
Suite 1106
Washington, DC 20005

Thomas Matzzie
President and CEO
Ethical Electric Inc.
1055 Thomas Jefferson Street NW
Suite 650
Washington, DC 20007

Gary DeSanto, President
Park Power LLC
150 North Radnor-Chester Road
Suite A130
Radnor, PA 19087

Norman Kennard, Esquire
PA Public Utility Commission
400 North Street
Harrisburg, PA 17101

Donna M.J. Clark, Esquire
Terrence J. Fitzpatrick, President
Energy Association of Pennsylvania
800 North Third Street
Suite 205
Harrisburg, PA 17102

Colleen P. Kartychak, Esquire
Consolidated Edison Solutions
698 Gamble Road
Oakdale, PA 15061

Enver Acevedo, Esquire
Consolidated Edison Company Inc.
4 Irving Place
Room 1815-S
New York, NY 10003-0987

John J. Gallagher, Esquire
Pike County Light & Power Co.
711 Forrest Road
Harrisburg, PA 17112

Theodore S. Robinson, Esquire
Citizen Power Inc.
2121 Murray Avenue
Pittsburgh, PA 15217

Divesh Gupta, Esquire
Assistant General Counsel
Constellation Energy Group, Inc.
100 Constellation Way, Suite 500C
Baltimore, MD 21202

David I. Fein, Esquire
Vice President, State Government
Affairs, East
Exelon Corporation
10 S. Dearborn Street, 47th Floor
Chicago, IL 60603

Amy Hamilton, Esquire
Director, Market Initiatives
Exelon Corporation
300 Exelon Way
Kennett Square, PA 19348

Craig G. Goodman, President
National Energy Marketers Association
3333 K Street NW
Suite 110
Washington, DC 20007

W. Craig Williams, Esquire
Anthony Gay, Esquire
Jeanne J. Dworetzky, Esquire
PECO Energy Company
2301 Market Street S23-1
P.O. Box 8699
Philadelphia, PA 19101-8699

Antonio Soruco
Director of Regulatory Affairs
PR Quinlan Associates Inc.
1012 14th Street NW
Suite 1106
Washington, DC 20005

Tori L. Giesler, Esquire
FirstEnergy
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

Kathy J. Kolich, Esquire
FirstEnergy
76 South Main Street
Akron, OH 44308

Garrett Johnston
Director of Marketing
Trilliant Inc.
206 Highlands Drive
Woodstock, GA 30188

Dick Munson
Environmental Defense Fund
18 South Michigan Avenue
12th Floor
Chicago, IL 60603

John L. Munsch, Esquire
FirstEnergy Corp.
800 Cabin Hill Drive
Greensburg, PA 15601

Kimberly H. Childe, Esquire
PA DEP
400 Market Street
Harrisburg, PA 17101

Jim Hawley
Michael Murray
Mission Data Coalition
1020 16th Street
Sacramento, CA 95814

Bernice K. McIntyre
Washington Gas Energy Services
13865 Sunrise Valley Drive
Suite 200
Herndon, VA 20171

Scott Debroff, Esquire
Tucker Arensberg PC
2 Lemoyne Drive
Suite 200
Lemoyne, PA 17043

Paul Pietsch
Demand Response & Smart Grid Coalition
1301 Connecticut Avenue NW
Suite 350
Washington, DC 20036

Leah Gibbons
Director of Regulatory Affairs
Energy Plus Holdings LLC
3711 Market Street
Philadelphia, PA 19104

Tim Enwall
President and COO
Tendril Networks
5395 Pearl Parkway, Suite 100
Boulder, CO 80301

Dr. & Mrs. Charles Tucker
900 Summit Lane
Oreland, PA 19075-2526

AEP Energy, Inc.
225 W. Wacker Dr., Ste. 700
Chicago, IL 60606

Agera Energy, LLC
555 Pleasantville Road, South Building,
Suite S-107
Briarcliff Manor, NY 10510

Allegheny Energy Supply Co. LLC
800 Cabin Hill Drive
Greensburg, PA 15601

Alpha Gas & Electric
971 Route 45, Suite 202
Pomona, NY 10970

Ambit Energy
1801 N. Lamar St., Ste 200
Dallas, TX 75202

American Power & Gas of PA LLC
411 Cleveland St. #299
Clearwater, FL 33755

American Power Partners
8205 Main Street, Suite 11
Buffalo, NY 14221

American PowerNet Management
45 Commerce Drive
Wyomissing, PA 19610

AP Gas & Electric (PA), LLC
6161 Savoy Drive, Suite 500
Houston, TX 77036

APN Starfirst, LP
45 Commerce Drive
Wyomissing, PA 19610

Better Cost Control
2274 Washington Street
Newton, MA 02462

Blue Pilot Energy
250 Pilot Road, Suite 300
Las Vegas, NV 89119

Bounce Energy
P.O. Box 4423, Msc #200
Houston, TX 77210

Champion Energy Services, LLC
1500 Rankin Rd., Suite 200
Houston, TX 77073

Clearview Electric, Inc
600 N. Pearl St Suite S104
Dallas, TX 75201

Community Energy, Inc.
100 Matsonford Rd, Bldg 3 - Ste 300
Radnor, PA 19087

Conoco Phillips Company
600 North Dairy Ashford (CH2070A)
Houston, TX 77079-1175

Consolidated Edison Solutions
100 Summit Lake Drive
Valhalla, NY 10595

CONSTELLATION NEWENERGY, INC.
1221 Lamar Street, Suite 750
Houston, TX 77010

DIRECT ENERGY BUSINESS, LLC
1001 Liberty Ave., 12th Floor
Pittsburgh, PA 15222

Direct Energy Services, LLC
12 Greenway Plaza, Suite 600
Houston, TX 77046

Discount Energy Group, LLC
22809 Pacific Coast Highway
Malibu, CA 90265

Discount Power, Inc.
6 Armstrong Road
Shelton, CT 06484

Dominion Energy Solutions
P.O. BOX 298
Pittsburgh, PA 15230-0298

DTE Energy Supply, Inc.
414 South Main St., Suite 200
Ann Arbor, MI 48104

EDF Energy Services, LLC
4700 W. Sam Houston Parkway N. Ste. 250
Houston, TX 77041

Employers' Energy Alliance of PA Inc.
2171 West 38th Street
Erie, PA 16508

Energetix, Inc.
31 Lewis Street, Suite 401
Binghamton, NY 13901

The Energy Cooperative Association of
Philadelphia
1315 Walnut Street, Suite 1000
Philadelphia, PA 19107

Energy Plus Holdings, LLC
3711 Market Street, Suite 1000
Philadelphia, PA 19104

Energy Rewards
PO Box 38611
Philadelphia, PA 19104

Energy.ME Midwest, LLC
1130 West Monroe St.
Chicago, IL 60607

ENERPENN USA dba YEP Energy
7660 Woodway Dr.
Houston, TX 77063

ETHICAL ELECTRIC
2 Wisconsin Circle, Suite 700
Chevy Chase, MD 20815

Everyday Energy
1055 Washington Boulevard, 7th Floor
Stamford, CT 06901

Exelon Generation Company, LLC
111 Market Place
Baltimore, MD 21202

FIRSTENERGY SOLUTIONS CORP
341 White Pond Drive
Akron, OH 44320

Frontier Utilities NE, LLC
5120 Woodway Dr. Suite 10015
Houston, TX 77056

GDF SUEZ ENERGY RESOURCES NA
P O BOX 25237
Lehigh Valley, PA 18002

Glacial Energy of PA, Inc.
24 Route 6A
Sandwich, MA 02563

Great American Power
2959 Cherokee Street, St 102
Kennesaw, GA 30144

Green Mountain Energy Company
P.O. Box 7476
Philadelphia, PA 19101

Guttman Energy Inc.
200 Speers St
Belle Vernon, PA 15012

Hess Energy Marketing, LLC
1 Hess Plaza
Woodbridge, NJ 07095

HIKO Energy, LLC
12 College Road
Monsey, NY 10952

Hudson Energy Services
P.O. Box 142109
Irving, TX 75104

IDT Energy, Inc.
550 Broad Street
Newark, NJ 07102

IGS Energy
P.O. Box 9060
Dublin, OH 43017

Independence Energy Group, LLC
3711 Market Street, Suite 1000
Philadelphia, PA 19104

INTEGRYS ENERGY SERVICES, INC
1716 Lawrence Drive
De Pere, WI 54115

Iron Energy dba KONA Energy
1114 Lost Creek Blvd.
Austin, TX 78746

Just Energy Pennsylvania Corp.
P.O. Box 2210
Buffalo, NY 14240-2210

Liberty Power Holdings LLC
800 W Cypress Creek Rd, Ste 410
Fort Lauderdale, FL 33309

Linde Energy Service
575 Mountain Avenue
Murray Hill, NJ 07974

MidAmerican Energy Company
4299 NW Urbandale Drive
Urbandale, IA 50322

N. Eastern States dba ENTRUST
1301 McKinney Suite 1250
Houston, TX 77010

NextEra Energy Services PA LLC
P.O. Box 25225
Lehigh Valley, PA 18002-5225

Nextera Energy Power Marketing
700 Universe Boulevard
Juno Beach, FL 33408

Noble Americas Energy Solution
401 W. A St., Ste 500
San Diego, CA 92101-7991

North American Power and Gas
One Marshall Street, Suite 205
Norwalk, CT 06854

Oasis Energy
11152 Westheimer, Suite 901
Houston, TX 77042

Oxford Energy Services, LLC
301 Grant St. 1 Oxford Center
Pittsburgh, PA 15219

Palmco Power PA, LLC
1350 60 Street
Brooklyn, NY 11219

Park Power
150 N. Radnor Chester Rd.
Radnor, PA 19087

Pennsylvania Gas & Electric
4075 Linglestown Rd., #113
Harrisburg, PA 17113

PEPCO Energy Services, Inc.
1300 North 17th Street, Suite 1600
Arlington, VA 22209

Pinnacle Power LLC
800 Bering Dr. Suite 250
Houston, TX 77057

PJM Interconnection, LLC
955 Jefferson Avenue
Valley Forge Corporate Center
Norristown, PA 19403-2497

Planet Energy Corp.
1500-5255 Yonge St.
Toronto, ON M2N 6P4

Plymouth Rock Energy Corp.
1074 Broadway
Woodmere, NY 11598

PPL EnergyPlus, LLC
2 N. Ninth St.
Allentown, PA 18101

Public Power, LLC
39 Old Ridgebury Rd, Suite 14
Danbury, CT 06810

Reliant Energy Northeast, LLC
1201 Fannin St., 7th Floor
Houston, TX 77002-0000

Rescom Energy Corp.
20 East Avenue
Bridgeport, CT 06610

Residents Energy, LLC
20 West Third Street
Jamestown, NY 14702-0400

Respond Power, LLC
100 Dutch Hill Road, Suite 230
Orangeburg, NY 10962

SFE Energy
651 Holiday Dr., Foster Plaza 5
Pittsburgh, PA 15220

Shiple Energy
PO Box 15052
York, PA 17405

SmartEnergy Holdings, LLC
575 Lexington Ave, 4th Floor
New York, NY 10022

Spark Energy, LP
2105 CityWest Boulevard, Suite 100
Houston, TX 77042

Sperian Energy Corp.
3440 Lehigh Street #288
Allentown, PA 18103

Star Energy Partners, LLC
3340 West Market Street
Akron, OH 44333

Starion Energy PA Inc.
220 Main Street South, Suite 206
Southbury, CT 06488

Stream Energy
P.O. Box 7287
Philadelphia, PA 19101-7287

TERM Power & Gas LLC
d/b/a ENCOA
8847 W. Sam Houston Parkway, North
Houston, TX 77040

Texas Retail Energy, LLC
2001 S.E. 10th Street
Bentonville, AR 72716

The Royal Bank of Scotland plc
401 West A Street, Suite 500
San Diego, CA 92101

Date: July 2, 2015

Think Energy
PO Box 27004
Lehigh Valley, PA 18002

Tobelmann Energy Brokers Inc.
5401 Lister Court
Chester Springs, PA 19425

TriEagle Energy, LP
PO Box 131615
The Woodlands, TX 77393-1615

UGI Energy Services, LLC
One Meridian Blvd., Suite 2C01
Wyomissing, PA 19610

U.S. Energy Partners, LLC
400 WillowBrook Office Park
Fairport, NY 14450

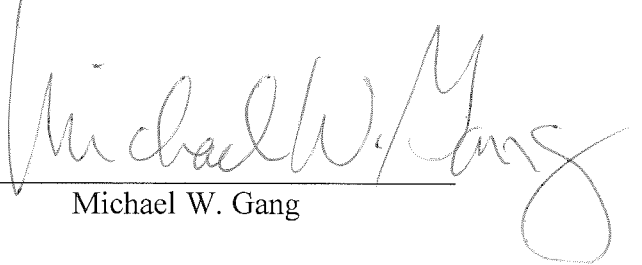
Verde Energy USA, Inc.
101 Merritt 7, 3rd Floor
Norwalk, CT 06851

Viridian Energy PA, LLC
64 North Main Street
Norwalk, CT 06854

Washington Gas Energy Services
P.O. Box 24475
Cleveland, OH 44124

XOOM Energy Pennsylvania, LLC
11208 Statesville Rd.
Huntersville, NC 18201

Your Choice Energy, LLC
1616 Batchelor Court
Dunedin, FL 34698


Michael W. Gang

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Duquesne Light Company For :
An Extension of Time And All Necessary : **Docket No. P-2015-_____**
Waivers To Implement Its Phase II Off- :
Cycle Switching Solution :

**PETITION OF DUQUESNE LIGHT COMPANY
FOR AN EXTENSION OF TIME AND ALL NECESSARY WAIVERS
TO IMPLEMENT ITS PHASE II OFF-CYCLE SWITCHING SOLUTION**

I. INTRODUCTION

Duquesne Light Company (“Duquesne Light” or the “Company”) hereby petitions the Pennsylvania Public Utility Commission (“Commission”), pursuant to 52 Pa. Code §§ 5.41 and 5.43 for an extension of time, and requests all necessary amendments of orders and waivers of regulations, to implement its Phase II Off-Cycle Switching (“Phase II OCS”) Solution. The Company implemented its Phase I OCS Solution on March 9, 2015, which allows for one off-cycle and one on-cycle switch per month for a vast majority of its customers. The OCS Phase II Solution will allow for multiple monthly switches. The additional information technology (“IT”) changes to the Company’s current software system that would be necessary to implement the Phase II OCS Solution as a customized add-on to the Company’s current systems are very complex. As an alternative, this change to the base code can best be performed by the software vendor/developer, Oracle, to ensure the integrity of the overall Oracle Utility platform and to maintain the stability of Duquesne Light’s existing customer oriented solution. Oracle is planning a new release 2.5.0.2 to the base billing software that is expected to allow customers multiple switches in a billing period. This new release by Oracle to the base software would be much more effective and create less risks than customizing code as an add-on for the current

software package. In addition, the Company would also note that, according to its statistics since March 9, 2015 when the Phase I Solution was implemented, only about 600 customers per month are requesting a second off-cycle switch. Therefore, Duquesne Light believes that it is prudent and beneficial to wait for this new release 2.5.0.2 before implementing the Phase II OCS Solution. In support of this Petition, Duquesne Light states as follows:

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:

Robert H. Hoaglund II, Esquire
Tishekia E. Williams, Esquire
Duquesne Light Company
411 Seventh Avenue, 16th Fl.
Pittsburgh, PA 15219
Telephone: 412-393-1058
 412-393-1541
Facsimile: 412-393-5695
E-Mail: rhoaglund@duqlight.com
 twilliams@duqlight.com

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Post & Schell, P.C.
17 North 2nd Street, 12th Floor
Harrisburg, PA 17101-1601
Telephone: 717-612-6026
 717-612-6034
Facsimile: 717-731-1985
E-Mail: mgang@postschell.com
 akanagy@postschell.com

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

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 its customers on a day to day basis. 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 Architecture¹, 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 electricity generation suppliers (“EGSs”). As is common with new and complex IT systems, a significant number of projects that were scheduled to be implemented after the FOCUS System went live (i.e., FOCUS Day 2 Projects) are also awaiting implementation to resolve customer and EGS issues, eliminate manual work-arounds and improve efficiencies. In addition, the Company should avoid, where possible, unnecessary customization of the FOCUS System² so as to not negatively impact customers and EGSs, and therefore, must be prudent when introducing significant changes.

5. On May 28, 2015, the Company filed its Petition for An Extension of Time and/or Waiver to Meet Certain Regulatory Requirements (“*May 2015 Petition*”) with the Commission. In the *May 2015 Petition*, the Company requested an extension of time and/or waiver, and requested all necessary amendments of orders and waivers of regulations, with respect to the following regulatory obligations: (1) to remit actual bill amounts to 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,

¹ 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.

² 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.

2015, and (5) to file its Phase 1 implementation and cost benefit analysis for enhanced outage communication and voltage monitoring functionality.³

6. In the *May 2015 Petition*, the Company explained that it had developed an implementation schedule or “Road Map” to implement its Advanced Metering Infrastructure (“AMI”), FOCUS Day 2 Projects and known regulatory initiatives through 2016. The Company also explained the guidelines that were used to develop the release schedule set forth in the Road Map. *May 2015 Petition*, pp. 4-5.

7. In the *May 2015 Petition*, the Company noted that it had a regulatory obligation to implement its Phase II OCS Solution by July 31, 2015. Duquesne Light further noted that it would not be able to meet this deadline for implementing OCS Phase II, but that it was continuing to investigate options for implementing this requirement and would file a subsequent Petition with the Commission requesting an extension of time and/or waiver to implement the Phase II OCS Solution. This Petition meets such commitment.

8. As shown in the chart below, the number of customers requesting a second off-cycle switch once the implementation of the OCS Phase I Solution occurred has been minimal – averaging around 600 per month.

³ The Commission has not ruled on the *May 2015 Petition* at this time and to date no comments or opposition have been filed with the Commission.

**Report to Determine Number Accounts
With Multiple Switch Requests Within a Month**

Month	Number of Switches						Grand Total
	1	2	3	4	5	6	
03-2015	10,780	506	28	4			11,318
04-2015	6,275	447	36	4	1	1	6,764
05-2015	6,990	573	38	6	9		7,616
06-2015	10,661	715	57	12	1		11,446
Grand Total	34,706	2,241	159	26	11	1	37,144

9. Below, Duquesne Light explains why it is reasonable and prudent for the Company to delay implementing the OCS Phase II Solution until Oracle develops the new release 2.5.0.2 and the Company is able to install this new release.

10. The new release currently is scheduled by Oracle to be generally available to the public (“generally available”) in July 2016. In addition, the Company estimates that it may require up to 12 months to test and integrate the new release with the Company’s existing system before taking it live, as further explained below. Therefore, the Company proposes to make an updated filing with the Commission in June 2016 to provide a Road Map of when it will implement the OCS Phase II Solution. Duquesne Light also proposes to include updates regarding the implementation of the OCS Phase II Solution with the quarterly updates proposed in the *May 2015 Petition*.

III. IT IS REASONABLE AND PRUDENT TO DELAY IMPLEMENTATION OF THE OCS PHASE II SOLUTION

11. On April 3, 2014, the Commission issued its *Final-Omitted Rulemaking Order* amending its existing regulations at 52 Pa. Code, Chapter 57 to direct EDCs and EGSs to

accelerate switching timeframes for retail electric customers to switch suppliers or to switch to and from default service in three business days. *Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 57 Regulation Regarding Standards for Changing a Customer's Electric Generation Supplier*, Docket No. L-2014-2409383, Order entered April 3, 2014 (“*Final-Omitted Rulemaking Order*”).

12. A primary purpose of the *Final-Omitted Rulemaking Order* was to facilitate customers in a variable rate program to more quickly switch to a lower or fixed rate after a spike in energy prices. *Final-Omitted Rulemaking Order*, p. 3.

13. EDCs were required to implement the new accelerated switching requirements by December 15, 2014. See Secretarial Letter, Docket No. L-2014-2409383 (September 8, 2014). However, recognizing that a considerable amount of time and resources may be needed to obtain full compliance, the Commission provided that any EDC or EGS unable to comply by December 15, 2014, could file a petition seeking a waiver that explains the inability to comply and provide proposed alternatives, including the estimated timeframe for implementation. *Final-Omitted Rulemaking Order*, p. 30.

14. Duquesne Light filed a *Petition for Waiver of the Three Business Day Switching Requirements Under 52 Pa. Code § 57.174* on October 21, 2014 (“*Waiver Petition*”). Therein, the Company explained that it was unique among EDCs in Pennsylvania because it was currently implementing its FOCUS Project that was scheduled to go live on November 28, 2014.

15. Duquesne Light also explained that in order to implement the three business day switching requirements, it would be required to make substantial additional IT modifications to customize its new FOCUS System after the go live date of November 28, 2014. While the Company was simultaneously developing and testing these modifications before the FOCUS go-

live date, the Company explained that it would not be able to fully integrate the IT changes for OCS into the FOCUS System until it was both live and stable. Moreover, there was a very limited time between November 28, 2014 and December 15, 2014, to integrate, test and stabilize the OCS solution to accomplish the three business day switching of suppliers.

16. In its Waiver Petition, the Company requested:

- (a) A waiver of 52 Pa. Code § 57.174 to implement its Phase I Solution by January 16, 2015;⁴ and
- (b) A waiver of 52 Pa. Code § 57.174 to implement its Phase II Solution by July 31, 2015.

17. On December 4, 2014, the Commission entered an Order denying Duquesne Light's request for a waiver of 52 Pa. Code § 57.174 to implement its Phase I Solution later than December 15, 2014.⁵ The Commission granted the Company a waiver of 52 Pa. Code § 57.174 to implement its Phase I Solution beginning December 15, 2014 through July 31, 2015. The Commission granted Duquesne Light's request to implement the Phase II Solution by July 31, 2015.

18. The Company implemented the Phase I Solution on March 9, 2015.

19. From its experiences over the last several months customizing code and implementing new releases into the FOCUS System, the Company has determined that

⁴ The Company subsequently requested extension of the originally requested waiver of 52 Pa. Code § 57.174 until it was able to implement its Phase I Solution. Under the Phase I Solution, the Company would initially provide for one off-cycle switch and one on-cycle switch per bill period for approximately 97% of its customer base (excluding CAP customers). Under the Phase II Solution, the Company will allow for multiple off-cycle switches per month for all of its customers.

⁵ The Company filed a Petition for Reconsideration of the December 2014 Order, which was denied by Order entered February 6, 2015. The Company appealed the Commission's denial of the Company request for a waiver of 52 Pa. Code § 57.174 until it was able to implement the Phase I Solution to the Commonwealth Court. The Company and the Commission entered into a Joint Stipulation and Request to Discontinue and Withdraw dated May 19, 2015 ("Joint Stipulation") and the Commonwealth Court issued an Order granting such request and discontinuing the Petition for Review without prejudice and subject to the Joint Stipulation.

implementing the OCS Phase II Solution is much more complex and creates greater risks than the Company originally anticipated. The Company has multiple releases already scheduled between now and July 2016 for AMI, FOCUS Day 2 Projects and the regulatory requirements, and these releases may require further code customization to the FOCUS System. To also layer a customized OCS Phase II Solution onto the FOCUS System creates the following challenges: potential delay in the releases over the next 12 months, including the regulatory commitments; additional testing to ensure that existing functionality is not negatively impacted and to avoid unintended consequences to the Oracle functions; and difficulty implementing Oracle upgrades, including for cybersecurity, into the FOCUS platform as it becomes further customized.

20. Based upon the risks from a customized OCS Phase II Solution, the Phase I Solution addressed the objective of accelerated switching for customers on variable rates, the limited number of customers seeking a second off-cycle switch, and the complexities of customizing code for the FOCUS System to implement OCS Phase II Solution, the Company turned to Oracle for a potential solution. Oracle has agreed in principle to develop a new release 2.5.0.2 to its utility industry base software and expects to make it generally available in July 2016. This upgrade is expected to include the ability to allow customers multiple off-cycle switches in a single billing period. Duquesne Light believes that it is prudent to wait to implement the Phase II OCS Solution until after the new base 2.5.0.2 software is released.

21. The Company will be moving from version 2.3.1.6 of the Oracle code in the current FOCUS System to version 2.5.0.2 to implement the new off-cycle switching base code. The 2.5.0.2 version of code represents two upgrades to the Oracle code from current version 2.3.1.6. The implementation of this upgrade, which represents multiple upgrades in one release, will also take significant review and testing to be integrated into the FOCUS System. Moreover,

all of the customizations that will have been implemented by July 2016 must be tested with the new 2.5.0.2 release to ensure that they work correctly.

22. The Company already faces the challenge of taking a FOCUS system that will be further customized over the next year and implementing into it a new Oracle base code in version 2.5.0.2 that has yet to be created. Consequently, it is speculative to estimate the time necessary for implementation after the Company receives version 2.5.0.2 in July 2016, but is advised that it may take an additional 12 months. Accordingly, the Company requests permission to submit a road map for implementation of version 2.5.0.2 in June 2016 to update the implementation timeline.

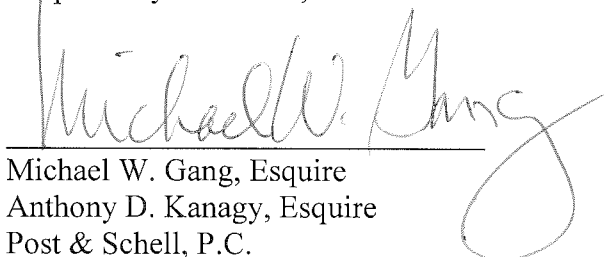
23. For these reasons, Duquesne Light respectfully requests an extension of time, an amendment to the December 2014 Order at Docket No. P-2014-2448863, and a waiver of 52 Pa. Code § 57.174 to delay implementation of the OCS Phase II Solution. As explained above, Oracle has agreed in principle to develop the new base billing software and expects to make it generally available by July of 2016 that will allow multiple switches. Duquesne Light must rely upon Oracle to meet such date, and work with Oracle to determine how long it will take to test and implement the new base 2.5.0.2 software into the FOCUS System. Therefore, Duquesne Light proposes to file an updated petition with the Commission in June 2016 that provides the status of Oracle's release of the base code with multiple off-cycle switches and sets forth a proposed road map for testing and implementing the new base off-cycle switching software.

24. Duquesne Light also requests that the Commission permit the Company to apply the OCS Phase I Solution that was granted in the December 2014 Order until the OCS Phase II Solution is implemented, and grant any necessary waiver.

IV. CONCLUSION

WHEREFORE, for the foregoing reasons, Duquesne Light Company respectfully requests that the Pennsylvania Public Utility Commission grant an extension of time and an amendment to the December 4, 2014 Order at Docket No. P-2014-2448863 and waiver of the Commission's regulation at 52 Pa. Code § 57.174 to implement the Company's Phase II Off-Cycle Switching Solution, an extension of permission to continue to apply to Phase I Off-Cycle Solution until the Phase II Off-Cycle Solution is available, and grant all necessary waivers.

Respectfully submitted,



Robert H. Hoaglund II, Esquire
Tishekia E. Williams, Esquire
Duquesne Light Company
411 Seventh Avenue, 16th Fl.
Pittsburgh, PA 15219
Telephone: 412-393-1058
 412-393-1541
Facsimile: 412-393-5695
E-Mail: rhoaglund@duqlight.com
 twilliams@duqlight.com

Michael W. Gang, Esquire
Anthony D. Kanagy, Esquire
Post & Schell, P.C.
17 North 2nd Street, 12th Floor
Harrisburg, PA 17101-1601
Telephone: 717-612-6026
 717-612-6034
Facsimile: 717-731-1985
E-Mail: mgang@postschell.com
 akanagy@postschell.com


Date: July 2, 2015

Attorneys for Duquesne Light Company

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 For an Extension of Time and All Necessary Waivers to Implement its Phase II Off-Cycle Switching Solution 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: July 2, 2015



Yvonne J. Phillips