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**RECEIVED**

JUN - 6 2019

June 6, 2019

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days in a Billing Period – Tariff Compliance Filing in Accordance with Docket No. P-2014-2446292 – Semi-annual Monitoring – Final Report

Dear Secretary Chiavetta:

Pursuant to Commission Order at Docket No. P-2014-2446292, entered on December 8, 2016, PECO Energy Company ("PECO") is filing the following semi-annual report of its monitoring efforts and results of the Off-Cycle Switching bill program. Note, the Commission's December 8, 2016 Order modified the original requirement (See Order dated December 4, 2014) for filing Monitoring reports from quarterly to semi-annually.

PECO is also providing the results to the Commission's Bureau of Consumer Services, the Office of Competitive Market Oversight, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Retail Energy Supply Association.

Note, this report is the final report PECO will be providing under this docket since PECO's temporary waiver of 52 PA Code § 56.2 and 56.11 is no longer applicable. This is due to the publication in the Pennsylvania Bulletin on June 1, 2019 the notice of the Commission's Chapter 56 Final Rulemaking Order. Specifically, the Order modified the definition of Billing month at § 56.2 which eliminates the need for PECO's waiver regarding the issuance of short-period bills when a customer changes electric generation supplier in order to effectuate a timely switch of supplier.

If you have any questions regarding this matter, please call Rich Schlesinger at 215-841-5771.

Sincerely,



cc: Alexis Bechtel, Bureau of Consumer Services  
Dan Mumford, Office of Competitive Market Oversight  
Richard Kanaskie, Director, Bureau of Investigation & Enforcement  
Office of Consumer Advocate  
Office of Small Business Advocate  
Retail Energy Supply Association

attachment

## OFF CYCLE SWITCHING – PUC REQUIRED REPORTING

Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days In a Billing Period – Docket P-2014-2446292	PUC Report Filing Date
<p><i>On December 4, 2014, in response to the Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days In a Billing Period, the PUC issued an order, Docket No. P-2014-2446292, directing PECO to provide a report of its monitoring efforts and results to the Commission’s Bureau of Consumer Services and Office of Competitive Market Oversight, the statutory advocates and Retail Energy Supply Association three months from the date this Order is entered, and every three months thereafter.</i></p> <p><i>On September 1, 2016, PECO filed a petition to extend the Temporary Waiver of Regulations Related to the Required Days in a Billing Period, Docket No. 2014-244629. The petition requested that the Commission grant an extension of the temporary waiver until such future date as the rulemaking in Docket No. L-2015-2508421 is finalized. Docket No. L-2015-2508421 is a Notice of Proposed Rulemaking to Amend Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C. S. Chapter 14. Included in this rulemaking is a proposed change to the definition of “billing month” that will render this waiver moot.</i></p> <p><i>On December 8, 2016, the PUC issued an order in response to PECO’s petition and granted the extension of the waiver until December 31, 2018. The PUC directed PECO to continue to monitor the results of the BOSS bill operations and report on its monitoring efforts and results to the Commission’s Bureau of Consumer Services, the Office of Competitive Market Oversight, the Commission’s Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Retail Energy Supply Association every six months from the date of the order.</i></p> <p><i>On September 7, 2018, PECO filed a petition to extend the Temporary Waiver of Regulations Related to the Required Days in a Billing Period, Docket No. 2014-244629. The petition requested that the Commission grant an extension of the temporary waiver until either December 31, 2020 or such earlier date as the rulemaking in Docket No. L-2015-2508421 is finalized.</i></p> <p><i>On December 6, 2018, the PUC issued an order in response to PECO’s petition and granted the extension of the waiver for an additional one year, through December 31, 2019. The one year was based on the final rulemaking for Docket No. L-2015-250842 expected to be complete by April 19, 2019. If the proposed rulemaking for Docket No. L-2015-250842 is completed as written prior to December 31, 2019, then the waiver will be moot as of the effective date of the regulation. If, however, the regulation is not complete as of April 19, 2019, PECO will have ample time to seek an additional extension. The PUC directed PECO to continue to monitor the results of the BOSS bill operations and report on its monitoring efforts and results to the Commission’s Bureau of Consumer Services, the Office of Competitive Market Oversight, the Commission’s Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Retail Energy Supply Association every six months from the date of the order through the end of the waiver period.</i></p>	<p>June 6, 2019</p> <div style="text-align: center; margin-top: 20px;"> <p><b>RECEIVED</b></p> <p>JUN - 6 2019</p> <p>PA PUBLIC UTILITY COMMISSION SECRETARY’S BUREAU</p> </div>

**Description of Reports**

1. Total number of customers receiving BOSS bills and the subsequent short-period on-cycle bill for each month.
2. Average number of BOSS bills per-customer during a normal billing cycle.  
 Note: Only for the customers that switched
3. Number of customers receiving more than one BOSS bill during a normal billing cycle.
4. The highest number of BOSS bills provided to one customer during each month.

**Report Data for December 17, 2014 to April 30, 2019**

	#1	#2	#3	#4
	Accounts Receiving BOSS Bills	Average BOSS Bills Per Account	Accounts With >1 BOSS Bill	Highest Number BOSS Bills
Dec-14	7,491	1.04	305	3
Jan-15	21,928	1.08	1,588	5
Feb-15	20,185	1.09	1,611	5
Mar-15	18,351	1.07	1,140	4
Apr-15	18,479	1.06	1,102	4
May-15	17,383	1.07	1,153	4
Jun-15	17,226	1.06	989	5
Jul-15	19,463	1.06	1,113	4
Aug-15	18,552	1.06	1,085	5
Sep-15	22,415	1.06	1,321	4
Oct-15	23,481	1.08	1,648	6
Nov-15	23,400	1.09	1,986	5
Dec-15	21,592	1.07	1,451	4
Jan-16	20,796	1.07	1,365	5
Feb-16	18,920	1.06	1,103	6
Mar-16	20,571	1.07	1,324	5
Apr-16	18,080	1.08	1,194	6
May-16	19,011	1.08	1,302	6
Jun-16	20,847	1.08	1,394	5
Jul-16	21,993	1.08	1,520	7
Aug-16	21,412	1.07	1,363	5
Sep-16	22,840	1.08	1,686	7
Oct-16	20,537	1.09	1,547	7
Nov-16	28,625	1.06	1,570	6
Dec-16	22,988	1.09	1,836	7
Jan-17	22,033	1.09	1,757	7
Feb-17	18,811	1.09	1,491	7
Mar-17	19,579	1.09	1,524	5
Apr-17	20,886	1.10	1,821	7
May-17	20,258	1.12	2,010	6

	#1	#2	#3	#4
	Accounts Receiving BOSS Bills	Average BOSS Bills Per Account	Accounts With >1 BOSS Bill	Highest Number BOSS Bills
Jun-17	38,708	1.06	1,892	7
Jul-17	20,992	1.11	2,031	7
Aug-17	20,388	1.10	1,820	7
Sep-17	33,691	1.06	1,747	5
Oct-17	20,300	1.10	1,683	6
Nov-17	22,862	1.10	1,980	7
Dec-17	26,321	1.13	2,966	6
Jan-18	25,872	1.11	2,421	9
Feb-18	21,991	1.10	1,964	6
Mar-18	20,762	1.10	1,781	6
Apr-18	21,130	1.12	2,036	6
May-18	20,600	1.12	2,048	7
Jun-18	21,092	1.12	2,113	9
Jul-18	26,416	1.11	2,412	7
Aug-18	23,009	1.10	2,113	7
Sep-18	37,626	1.07	2,278	6
Oct-18	20,939	1.12	2,228	6
Nov-18	21,505	1.12	2,213	6
Dec-18	26,326	1.12	2,739	6
Jan-19	24,198	1.10	2,226	7
Feb-19	22,109	1.10	1,966	6
Mar-19	21,078	1.10	1,872	6
Apr-19	17,639	1.11	1,683	6

**Description of Report**

5. Number of late payments associated with a BOSS bill and the average number of days late during the reporting period and since implementation of BOSS billing.

**Report Data for December 17, 2014 to April 30, 2019**

	<b>Number of Late Payments</b>	<b>Average Days Late</b>
<b>Dec-14</b>	2,935	139
<b>Jan-15</b>	9,302	208
<b>Feb-15</b>	8,647	180
<b>Mar-15</b>	7,559	123
<b>Apr-15</b>	7,788	110
<b>May-15</b>	6,817	108
<b>Jun-15</b>	6,864	105
<b>Jul-15</b>	8,358	111
<b>Aug-15</b>	8,133	140
<b>Sep-15</b>	10,102	223
<b>Oct-15</b>	9,241	117
<b>Nov-15</b>	10,151	95
<b>Dec-15</b>	8,608	102
<b>Jan-16</b>	8,331	103
<b>Feb-16</b>	7,513	104
<b>Mar-16</b>	7,995	96
<b>Apr-16</b>	7,290	80
<b>May-16</b>	7,480	84
<b>Jun-16</b>	8,553	77
<b>Jul-16</b>	9,029	88
<b>Aug-16</b>	9,081	91
<b>Sep-16</b>	9,049	94
<b>Oct-16</b>	7,952	92
<b>Nov-16</b>	10,293	86
<b>Dec-16</b>	9,168	90
<b>Jan-17</b>	8,797	88
<b>Feb-17</b>	7,450	90
<b>Mar-17</b>	8,004	86
<b>Apr-17</b>	8,100	84
<b>May-17</b>	7,684	81
<b>Jun-17</b>	12,148	72
<b>Jul-17</b>	8,828	81

	<b>Number of Late Payments</b>	<b>Average Days Late</b>
<b>Aug-17</b>	8,657	78
<b>Sep-17</b>	11,062	74
<b>Oct-17</b>	7,920	72
<b>Nov-17</b>	8,657	74
<b>Dec-17</b>	10,642	90
<b>Jan-18</b>	10,729	73
<b>Feb-18</b>	9,058	70
<b>Mar-18</b>	8,208	64
<b>Apr-18</b>	8,280	66
<b>May-18</b>	8,034	58
<b>Jun-18</b>	8,381	57
<b>Jul-18</b>	10,267	58
<b>Aug-18</b>	9,873	54
<b>Sep-18</b>	18,690	33
<b>Oct-18</b>	8,874	52
<b>Nov-18</b>	8,389	48
<b>Dec-18</b>	10,786	44
<b>Jan-19</b>	9,407	37
<b>Feb-19</b>	8,344	30
<b>Mar-19</b>	8,321	21
<b>Apr-19</b>	5,366	8
<b>Total</b>	465,195	
<b>Average</b>		85

Note: The monthly decrease in the average number of days late does not represent a trend. Due to the timing of when data is collected, the bills in the later months have a limited number of days that could be counted as late.

**Description of Report**

6. Number of late payments associated with a short-period on-cycle bill and the average number of days late during reporting period and since implementation of BOSS billing.

**Report Data for December 17, 2014 to April 30, 2019**

	<b>Number of Late Payments</b>	<b>Average Days Late</b>
<b>Dec-14</b>	302	154
<b>Jan-15</b>	5,814	142
<b>Feb-15</b>	6,528	115
<b>Mar-15</b>	5,770	77
<b>Apr-15</b>	6,071	82
<b>May-15</b>	5,450	75
<b>Jun-15</b>	5,101	78
<b>Jul-15</b>	5,331	82
<b>Aug-15</b>	6,508	149
<b>Sep-15</b>	6,593	74
<b>Oct-15</b>	7,227	92
<b>Nov-15</b>	7,792	96
<b>Dec-15</b>	6,356	67
<b>Jan-16</b>	5,515	69
<b>Feb-16</b>	5,656	66
<b>Mar-16</b>	6,062	67
<b>Apr-16</b>	5,805	61
<b>May-16</b>	5,609	65
<b>Jun-16</b>	5,662	63
<b>Jul-16</b>	6,450	63
<b>Aug-16</b>	6,591	60
<b>Sep-16</b>	6,741	62
<b>Oct-16</b>	6,196	65
<b>Nov-16</b>	6,536	65
<b>Dec-16</b>	8,074	61
<b>Jan-17</b>	5,405	63
<b>Feb-17</b>	5,807	72
<b>Mar-17</b>	5,750	73
<b>Apr-17</b>	5,828	58
<b>May-17</b>	5,764	60
<b>Jun-17</b>	6,813	54
<b>Jul-17</b>	7,476	60

	<b>Number of Late Payments</b>	<b>Average Days Late</b>
<b>Aug-17</b>	6,277	54
<b>Sep-17</b>	8,155	53
<b>Oct-17</b>	5,844	60
<b>Nov-17</b>	6,292	60
<b>Dec-17</b>	6,907	55
<b>Jan-18</b>	6,764	53
<b>Feb-18</b>	6,918	51
<b>Mar-18</b>	5,984	51
<b>Apr-18</b>	5,585	53
<b>May-18</b>	6,669	49
<b>Jun-18</b>	5,621	49
<b>Jul-18</b>	6,338	48
<b>Aug-18</b>	7,479	45
<b>Sep-18</b>	9,540	42
<b>Oct-18</b>	7,964	45
<b>Nov-18</b>	6,010	48
<b>Dec-18</b>	7,170	43
<b>Jan-19</b>	6,268	38
<b>Feb-19</b>	6,976	34
<b>Mar-19</b>	6,472	21
<b>Apr-19</b>	4,541	7
<b>Total</b>	332,357	
<b>Average</b>		63

Note: The monthly decrease in the average number of days late does not represent a trend. Due to the timing of when data is collected, the bills in the later months have a limited number of days that could be counted as late.

**Description of Report**

7. Number of customer contacts related to PECO's BOSS billing during each month.

Report Data for December 17, 2014 to April 30, 2019

	<b>BOSS Billing related customer calls into call center</b>
<b>Dec-14</b>	107
<b>Jan-15</b>	1,265
<b>Feb-15</b>	1,293
<b>Mar-15</b>	1,135
<b>Apr-15</b>	954
<b>May-15</b>	958
<b>Jun-15</b>	1,021
<b>Jul-15</b>	992
<b>Aug-15</b>	1,239
<b>Sep-15</b>	1,148
<b>Oct-15</b>	1,445
<b>Nov-15</b>	1,084
<b>Dec-15</b>	963
<b>Jan-16</b>	812
<b>Feb-16</b>	1041
<b>Mar-16</b>	1051
<b>Apr-16</b>	769
<b>May-16</b>	790
<b>Jun-16</b>	880
<b>Jul-16</b>	930
<b>Aug-16</b>	1143
<b>Sep-16</b>	1242
<b>Oct-16</b>	937
<b>Nov-16</b>	1056
<b>Dec-16</b>	1350
<b>Jan-17</b>	856
<b>Feb-17</b>	861
<b>Mar-17</b>	818
<b>Apr-17</b>	790
<b>May-17</b>	806
<b>Jun-17</b>	1524
<b>Jul-17</b>	1730

	<b>BOSS Billing related customer calls into call center</b>
<b>Aug-17</b>	1147
<b>Sep-17</b>	2159
<b>Oct-17</b>	1089
<b>Nov-17</b>	877
<b>Dec-17</b>	826
<b>Jan-18</b>	947
<b>Feb-18</b>	1023
<b>Mar-18</b>	817
<b>Apr-18</b>	870
<b>May-18</b>	1051
<b>Jun-18</b>	771
<b>Jul-18</b>	1034
<b>Aug-18</b>	1644
<b>Sep-18</b>	1113
<b>Oct-18</b>	1017
<b>Nov-18</b>	781
<b>Dec-18</b>	976
<b>Jan-19</b>	861
<b>Feb-19</b>	860
<b>Mar-19</b>	1009
<b>Apr-19</b>	806
<b>Total</b>	54,668

**Description of Report**

8. Total cost of providing BOSS bills and subsequent short-period on-cycle bills since implementation of BOSS billing.

Note: Only reporting incremental costs of Off Cycle Switching, excluding project costs.

**Report Data for December 17, 2014 to April 30, 2019**

	# Off Cycle E-Bills	Cost E-Bills	# Off Cycle Paper Bills	Cost Paper Bills	Total Cost
Dec-14	832	\$166	6,972	\$3,486	\$3,652
Jan-15	2,197	\$439	20,488	\$10,244	\$10,683
Feb-15	2,230	\$446	18,536	\$9,268	\$9,714
Mar-15	2,103	\$421	18,840	\$9,420	\$9,841
Apr-15	1,894	\$379	18,682	\$9,341	\$9,720
May-15	1,749	\$350	16,022	\$8,011	\$8,361
Jun-15	1,760	\$352	17,453	\$8,901	\$9,253
Jul-15	1,899	\$380	19,596	\$9,994	\$10,374
Aug-15	1,738	\$348	18,720	\$9,547	\$9,895
Sep-15	2,125	\$425	21,425	\$10,927	\$11,352
Oct-15	2,392	\$478	24,739	\$12,617	\$13,095
Nov-15	2,025	\$405	20,616	\$10,514	\$10,919
Dec-15	2,155	\$431	21,040	\$10,730	\$11,161
Jan-16	1,896	\$379	18,376	\$9,372	\$9,751
Feb-16	1,914	\$383	18,228	\$9,296	\$9,679
Mar-16	2,137	\$427	21,967	\$11,203	\$11,631
Apr-16	1,660	\$332	17,812	\$9,084	\$9,416
May-16	1,723	\$345	18,757	\$9,566	\$9,911
Jun-16	1,852	\$370	21,478	\$10,954	\$11,324
Jul-16	1,757	\$351	21,159	\$10,791	\$11,142
Aug-16	2,205	\$441	24,163	\$12,323	\$12,764
Sep-16	1,850	\$370	21,451	\$10,940	\$11,310
Oct-16	1,931	\$386	20,959	\$10,689	\$11,075
Nov-16	2,958	\$592	26,321	\$13,424	\$14,015
Dec-16	1,884	\$377	21,892	\$11,165	\$11,542
Jan-17	1,838	\$368	21,057	\$10,739	\$11,107
Feb-17	1,509	\$302	18,399	\$9,383	\$9,685
Mar-17	1,910	\$382	21,232	\$10,828	\$11,210
Apr-17	1,710	\$342	20,041	\$10,221	\$10,563
May-17	1,790	\$358	22,125	\$11,284	\$11,642
Jun-17	4,731	\$946	37,272	\$19,009	\$19,955
Jul-17	1,678	\$336	20,558	\$10,485	\$10,820

	# Off Cycle E-Bills	Cost E-Bills	# Off Cycle Paper Bills	Cost Paper Bills	Total Cost
<b>Aug-17</b>	1,876	\$375	22,659	\$11,556	\$11,931
<b>Sep-17</b>	3,954	\$791	31,822	\$16,229	\$17,020
<b>Oct-17</b>	1,999	\$400	22,005	\$11,223	\$11,622
<b>Nov-17</b>	1,960	\$392	21,985	\$11,212	\$11,604
<b>Dec-17</b>	1,949	\$390	25,052	\$12,777	\$13,166
<b>Jan-18</b>	2,258	\$452	26,403	\$13,466	\$13,917
<b>Feb-18</b>	1,745	\$349	21,614	\$11,023	\$11,372
<b>Mar-18</b>	1,805	\$361	21,971	\$11,205	\$11,566
<b>Apr-18</b>	1,690	\$338	21,884	\$11,161	\$11,499
<b>May-18</b>	1,655	\$331	22,445	\$11,447	\$11,778
<b>Jun-18</b>	1,659	\$332	22,130	\$11,286	\$11,618
<b>Jul-18</b>	2,227	\$445	26,836	\$13,686	\$14,132
<b>Aug-18</b>	1,986	\$397	26,315	\$13,421	\$13,818
<b>Sep-18</b>	2,065	\$413	35,702	\$18,208	\$18,621
<b>Oct-18</b>	1,645	\$329	24,005	\$12,243	\$12,572
<b>Nov-18</b>	1,672	\$334	21,959	\$11,199	\$11,533
<b>Dec-18</b>	1,820	\$364	24,762	\$12,629	\$12,993
<b>Jan-19</b>	1,924	\$385	24,803	\$12,650	\$13,034
<b>Feb-19</b>	1,615	\$323	21,500	\$10,965	\$11,288
<b>Mar-19</b>	1,752	\$350	21,688	\$11,061	\$11,411
<b>Apr-19</b>	1,193	\$239	19,498	\$9,944	\$10,183
<b>Total</b>	104,481	\$20,896	1,163,414	\$592,346	\$613,242

Note: The cost of an E-Bill is between \$0.00/bill for web bills and \$0.20/bill for CheckFree (\$0.20/bill is assumed in the above table). On May 31, 2015 the cost of paper bills increased to \$0.51 /bill from \$0.50/bill due to an increase in postage charges.

## Description of Report

9. Efforts to investigate the potential for reflecting multiple switches on a single monthly bill and analysis of the results of such an investigation, including cost estimates.

## Report Data for December 17, 2014 to April 30, 2019

- PECO held the first stakeholder webinar on June 29, 2015 to meet its commitment in the petition for temporary waiver – P-2014-2446292. The meeting was attended by 18 external parties which included representatives from OCA, PUC and 16 electric generation suppliers.
- PECO completed the business requirements that were deferred. The final work stream was placed into production on August 13, 2015. See report #10 for details.
- The revised estimate to reflect multiple switches on a single monthly bill has been calculated – Total Project cost is \$2.5M. PECO would prefer to continue the use of the BOSS Bill approach and will reevaluate the potential of a single monthly bill if and when Gas Accelerated Switching is ordered.
- PECO held the second stakeholder meeting/webinar on December 14, 2015. The meeting was attended by 24 external parties which included representatives from OCA, PUC and 13 electric generation suppliers.
- PECO held the third stakeholder meeting/webinar on June 29, 2016. The meeting was attended by 32 external parties which included representatives from OCA, PUC and 25 electric generation suppliers.
- Filed the Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days in a Billing Period, Docket No. P-2014-2446292 on September 1, 2016. This petition requested an extension of the waiver until such future date as the rulemaking in Docket No. L-2015-2508421 is finalized. Docket No. L-2015-2508421 is a Notice of Proposed Rulemaking to Amend Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of 66 Pa. C. S. Chapter 14. Included in this rulemaking is a proposed change to the definition of “billing month” that will render this waiver moot.
- In response to the petition, on December 8, 2016, the PUC extended the waiver until December 31, 2018. PECO is now required to provide a report every six months from the date of the latest order with stakeholders meeting following 30 days after the release of each BOSS bill report.
- PECO held the sixth stakeholder meeting/webinar on June 18, 2018. The meeting was attended by 14 external parties which included representatives from PUC and 11 electric generation suppliers.
- Filed the Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days in a Billing Period, Docket No. P-2014-2446292 on September 7, 2018. This petition requested an extension of the waiver until such future date as the rulemaking in Docket No. L-2015-2508421 is finalized.
- In response to the waiver petition, on December 6, 2018, the PUC extended the waiver until December 31, 2019. PECO is required to provide a report every six months from the date of the latest order and hold stakeholders meetings as necessary to communicate material changes to the BOSS Bill program that affect customers and electric generation suppliers.

## Description of Report

10. Any changes made to improve the implementation of BOSS billing over the prior three months.

## Report Data for February 1, 2015 to April 30, 2019

- Changes implemented on February 12, 2015, April 17, 2015, June 11, 2015 and August 13, 2015 to enhance the BOSS bill implementation and address scope that was deferred in order to meet the December 2014 deadline. Scope includes:
  - ✓ Bill message enhancements
  - ✓ The ability to prevent all inserts on BOSS Bills
  - ✓ Historical Interval Usage / Historical Usage (HI/HU) improvements
  - ✓ Net Metering enhancements
  - ✓ Changes to ensure that PECO Smart A/C Saver (a PECO Smart Ideas program that helps customers use less energy and save money) credits appear on on-cycle bill only
  - ✓ Suspended charges enhancements
  - ✓ Modifications to several windows and archival size limits in the Customer Information System (CIS) to accommodate the potential for the increased frequency of bills due to BOSS billing.
  - ✓ New BOSS reports
  - ✓ New contact type added to the Customer Service Window (CSW) in the Customer Information System (CIS) to identify a BOSS billing call.
  - ✓ Adjustment to annual ICAP extraction to include multiple BOSS bills in the same bill period
- Addressed minor issues found during post implementation.

