

Karen O. Moury  
717.237.6036  
kmoury@eckertseamans.com

June 26, 2019

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: PA Public Utility Commission, Office of Consumer Advocate, Office of Small Business Advocate, Philadelphia Industrial & Commercial Gas Users Group and William Dingfelder v. Philadelphia Gas Works - Docket Nos. R-2017-2586783; C-2017-2592092; C-2017-2593497; C-2017-2595147; C-2017-2593903

Dear Secretary Chiavetta:

Please accept this correspondence as notification, pursuant to Paragraph 21(a), footnote 3, of the Joint Petition for Settlement (“Settlement”) of Philadelphia Gas Works (“PGW”) and the Office of Consumer Advocate (“OCA”), of a delay in the deployment of system changes beyond July 2, 2019. The OCA has indicated that it does oppose the delay or intend to take action in response to this notification. Accordingly, PGW submits that this notification does not require any action by the Commission at this time.

The Settlement, which was filed on April 17, 2019, resolved the litigated issue in the captioned matter relating to PGW’s partial payment application practices. Under Paragraph 21(a), PGW committed to making the modifications directed by the May 18, 2018 Order by July 2, 2019. In footnote 3 of Paragraph 21(a), PGW stressed the importance of thorough testing prior to implementation and agreed to promptly inform the OCA and the Commission of any delays, along with a detailed explanation and new implementation date. Thereafter, PGW committed to providing bi-weekly status updates. As it deems necessary, the OCA retained all procedural rights to respond to a notification of a delay. The Settlement was approved by the Commission on June 13, 2019 through adoption of a Motion offered by Vice Chairman Sweet; the issuance of an order is currently pending.

PGW has encountered a number of issues testing this significant modification to its billing system. PGW has been testing the code changes required for this modification since October 2018, and has encountered 78 defects requiring code correction and re-testing. The most recent defect was found on Monday, June 24, 2019. Currently, PGW continues its testing. In light of the defects encountered thus far, PGW will conduct approximately one month of regression testing that will run parallel to production in order to determine whether the code is prepared for

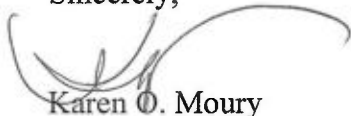
full implementation. Due to the importance of avoiding billing errors and customer confusion, it is important that PGW conduct this thorough testing in order to attempt to rectify any problems before implementing the changes. PGW's projected implementation date is August 19, 2019, as shown below.

Project	Status	Current Projected Implementation Date
Payment Application Enhancement	Original coding and unit testing complete; Quality Assurance and User Acceptance testing continuing concurrently; regressing testing not started.	August 19, 2019

Consistent with footnote 3 of Paragraph 21(a) of the Settlement, PGW will provide biweekly updates on July 11, 2019, July 25, 2019 and August 8, 2019.

If you have any questions please do not hesitate to contact me.

Sincerely,



Karen O. Moury

KOM/lww

cc: Robert A. Marinko, Deputy Director OSA via email – [rmarinko@pa.gov](mailto:rmarinko@pa.gov)  
Cert. of Service (email only)

**CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the foregoing Notification upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

**Via Email**

Carrie Wright, Esq.  
Erika L. McLain, Esq.  
Bureau of Investigation and Enforcement  
PA Public Utility Commission  
Commonwealth Keystone Building  
PO Box 3265  
400 North Street, 2nd Floor West  
Harrisburg, PA 17105-3265  
[carwright@pa.gov](mailto:carwright@pa.gov)  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

Harrison Breitman, Esq.  
Darryl Lawrence, Esq.  
Christy Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)  
[dlawrence@paoca.org](mailto:dlawrence@paoca.org)  
[cappleby@paoca.org](mailto:cappleby@paoca.org)

Sharon Webb, Esq.  
Office of Small Business Advocate  
Commerce Building  
300 North Second Street, Suite 202  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)


Todd S. Stewart, Esq.  
Hawke McKeon & Sniscak LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[tsstewart@hmslegal.com](mailto:tsstewart@hmslegal.com)

Patrick M. Cicero, Esq.  
Elizabeth R. Marx, Esq.  
Joline Price, Esq.  
The Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Josie B. H. Pickens, Esq.  
Robert W. Ballenger, Esq.  
Jennifer Collins, Esq.  
Community Legal Services, Inc.  
1424 Chestnut Street  
Philadelphia, PA 19102  
[jpickens@clsphila.org](mailto:jpickens@clsphila.org)  
[rballenger@clsphila.org](mailto:rballenger@clsphila.org)  
[jcollins@clsphila.org](mailto:jcollins@clsphila.org)

Charis Mincavage, Esq.  
Adelou A. Bakare, Esq.  
Alessandra L. Hylander, Esq.  
McNees Wallace & Nurick, LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[ahylander@mcneeslaw.com](mailto:ahylander@mcneeslaw.com)

Dated: June 26, 2019

  
\_\_\_\_\_  
Karen O. Moury, Esq.