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August 8, 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

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Dear Secretary Chiavetta:

Consistent with Paragraph 21(a), footnote 3, of the Joint Petition for Settlement (“Settlement”) of Philadelphia Gas Works (“PGW”) and the Office of Consumer Advocate (“OCA”), and Ordering Paragraph 5 of the Commission Order entered on June 28, 2019, PGW provides this biweekly update regarding deployment of agreed-upon billing system changes. The Settlement, which was filed on April 17, 2019 and approved by the June 28, 2019 Order, resolved the litigated issue in the above-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.

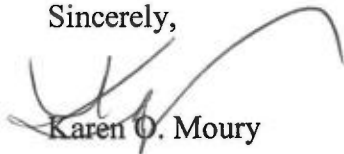
On June 26, 2019, PGW provided a formal notification to the Commission and OCA that it had encountered a number of issues testing this significant modification to its billing system. Based on numerous defects requiring code correction and re-testing, and due to the importance of avoiding billing errors and customer confusion, PGW gave a new projected implementation date of August 19, 2019. On July 11, 2019, PGW filed its first biweekly update, noting that due to the discovery of two additional defects since the June 26, 2019 notification, more coding and additional testing would be necessary and that full implementation may be delayed until September 2019. PGW’s second biweekly update, which was filed on July 25, 2019, alerted the Commission of an anticipated delay of full implementation until September 2019.

PGW has continued testing the payment application modification. Since the July 25, 2019 update was provided, testing on all business case scenarios has been completed. Of the seven open code defects described in the July 25 report, four have been corrected. During testing and re-testing, seven new defects were found. Thus, ten open defects are being corrected. These corrections will require testing, and re-coding if errors are found or related errors occur. Full implementation is currently still expected in September 2019, as noted below. OCA has indicated that it does not oppose this additional extension. PGW will provide its next biweekly update on August 22, 2019.

<b>Project</b>	<b>Status</b>	<b>Current Projected Implementation Date</b>
<b>Payment Application Enhancement</b>	Original coding and unit testing complete; Quality Assurance and User Acceptance testing continuing concurrently; regress testing not started.	September 2019

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

Sincerely,



Karen O. Moury

KOM/lww

cc: Cert. of Service (email only)