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October 17, 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. **By this biweekly update, PGW notifies the Commission and OCA of a delay in implementation until November 8, 2019.**

Under Paragraph 21(a) of the Settlement, PGW agreed to make 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 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, 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

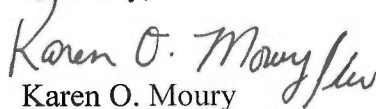
be necessary and that full implementation may be delayed until September 2019. PGW's second biweekly update, which was filed on July 25, 2019, alerted the Commission of an anticipated delay of full implementation until September 2019. Through its third biweekly update, which was filed on August 8, 2019, PGW noted that ten open code defects were being corrected and indicated that implementation was expected to occur in September 2019. On August 22, 2019, PGW submitted its fourth biweekly update, reporting that testing on code fixes was continuing and that five outstanding defects were in the process of being corrected. At that time, PGW still expected full implementation to occur in September 2019. On September 5, 2019, PGW filed its fifth biweekly update, explaining that five outstanding defects had been recoded and notifying the Commission and OCA of a new projected implementation date of October 7, 2019. In its sixth biweekly update filed on September 19, 2019 notified the Commission and OCA of a new projected implementation date of October 25, 2019. PGW filed its seventh biweekly update on October 3, 2019, noting code issues that were in the process of being corrected.

Since the October 3, 2019 update was provided, PGW has continued regression testing. One code issue that requires correction prior to implementation is still in the process of a fix, and code in the testing environment is being examined for a transfer defect that appears to be creating additional defects. As a result, the final code is currently not expected to be available for production until November 8, 2019. Significant issues in production would require a rollback. PGW will provide its next biweekly update on October 31, 2019.

<b>Project</b>	<b>Status</b>	<b>Current Projected Implementation Date</b>
<b>Payment Application Enhancement</b>	Regression testing continuing.	November 8, 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)

**CERTIFICATE OF SERVICE**

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

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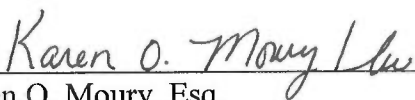
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Dated: October 17, 2019