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November 14, 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:

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 December 6, 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 updated 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. PGW's eighth biweekly update was filed on October 17, 2019, explaining that code was still be tested and corrected and alerting the Commission and OCA of a new projected implementation date of November 8, 2019. PGW's ninth biweekly update was filed on October 31, 2019, describing continuing implementation challenges and alerting the Commission of a new projected date of November 15, 2019.

Since the October 31, 2019 update was provided, PGW has continued testing in the parallel billing test environment. The code issue reported on October 31, 2019 has been fixed and tested. This fix is awaiting a similar actual payment for a subsequent test in the parallel billing test environment. Currently, PGW is investigating a significant delay in the job that runs payments. Such delay could negatively impact billing and requires a resolution prior to implementation. Given this issue, PGW does not expect that the code will be ready on November 15, 2019. Final code is now expected to be available for production on December 6, 2019. Significant issues in production would require a rollback. PGW will provide its next biweekly update on November 27, 2019.

Project	Status	Current Projected Implementation Date
Payment Application Enhancement	Regression testing continuing.	December 6, 2019

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

Sincerely,



Karen O. Moury
Certificate of Service (email only)