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December 12, 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 informs the Commission and OCA of a delay in implementation until January 24, 2020.**

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. Thereafter, biweekly updates were provided, along with new implementation dates, as follows:

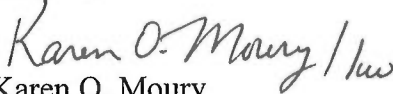
- On July 11, 2019, PGW filed its first biweekly update, noting that due to the discovery of two additional defects since the June 26, 2019 notification, more coding and additional testing would be necessary and that full implementation may be delayed until September 2019;
- On July 25, 2019, PGW filed its second biweekly update, reiterating its expectation of a delay in full implementation until September 2019;
- On August 8, 2019, PGW filed its third biweekly update, indicating that implementation was expected to occur in September 2019;
- On August 22, 2019, PGW filed its fourth biweekly update, noting its continued expectation that full implementation would 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;
- On September 19, 2019, PGW filed its sixth biweekly update, notifying the Commission and OCA of a new projected implementation date of October 25, 2019 due to the need for about a month of regression testing;
- On October 3, 2019, PGW filed its seventh biweekly update, noting code issues that were in the process of being corrected;
- On October 17, 2019, PGW's filed its eighth biweekly update, 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;
- On October 31, 2019, PGW's filed its ninth biweekly update, describing continuing implementation challenges and alerting the Commission and OCA of a new projected date of November 15, 2019;
- On November 14, 2019, PGW filed its tenth biweekly update, alerting the Commission and OCA of a delay in implementation until December 6, 2019 due to a significant delay in the job that runs payments; and
- On November 27, 2019, PGW filed its eleventh biweekly update, reporting that fixes of code issues were being tested and that it was still attempting to resolve a significant delay in the billing jobs.

Since the November 27, 2019 update was provided, PGW is continuing to attempt to resolve a significant delay in the billing jobs. Due to the impact on billing, such delay requires a resolution prior to implementation. As a result, PGW did not meet the December 6, 2019 implementation date. Today, PGW participated in a discussion with OCA to further explain the issues causing the delay. Given its continuing attempts to resolve the issue, PGW does not expect to be able to implement the project in December 2019 or early January 2020, as shown below. PGW will provide its next biweekly update on December 26, 2019.

<b>Project</b>	<b>Status</b>	<b>Current Projected Implementation Date</b>		
<b>Payment Application Enhancement</b>	Job impact delay work continuing.	January 24, 2020		

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

Sincerely,

  
Karen O. Moury  
Certificate 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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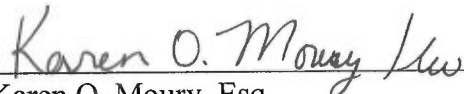
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Dated: December 12, 2019