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March 27, 2023

Via Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Keystone Bldg. 2nd Floor W
400 N. Street
Harrisburg, PA 17120

Re: Letter Petition for Waiver *Nunc Pro Tunc* of Commission Regulation, 52 Pa. Code § 54.153(b)(1)(ii) P-2023-_____

Dear Secretary Chiavetta:

Pursuant to Pennsylvania Public Utility Commission (“Commission” or “PUC”) staff instructions, Duquesne Light Company (“Duquesne Light” or the “Company”) hereby files this Letter Petition requesting a waiver, *nunc pro tunc*, of certain Commission regulations related to the Customer Service Performance Report, otherwise referred to as the Quality of Service Report.

In accordance with Commission regulations, 52 Pa. Code §§ 54.151-54.156 *et seq.*, and the Commission’s Rulemaking on Electric Distribution Company (“EDC”) Reporting Requirements for Quality of Service Benchmarks and Standards at Docket No. L-00970131 (April 24, 1998), Duquesne Light annually provides the PUC with various customer service data, including the Company’s “busy-out” rate. Commission regulation 52 Pa. Code § 54.152 defines the “busy-out” rate as “[t]he number of calls to an EDC’s call center or business office that received a busy signal divided by the number of calls that were received.”

In compiling the busy-out data for the 2022 Quality of Service Report in February 2023, Duquesne Light discovered that the 2021 busy-out data was incorrectly reported. The Company offers an interactive voice response (“IVR”) system. When call volume exceeds a certain level, calls are forwarded to a third-party hosted IVR. The 2021 data submitted incorrectly reported the number of calls that were forwarded to the hosted IVR, rather than reporting the calls that received a busy signal.

Upon investigation, the Company has determined that the data necessary to calculate the correct busy-out rate for 2021 and 2022 are no longer available. Historically, these data were stored in two locations: the data originated with the Company’s third-party telephone services vendor, and a Duquesne Light employee manually downloaded the busy-out data from the vendor on a monthly basis. The employee responsible for downloading the 2021 and 2022 busy-

March 27, 2023

Page 2

out data left the Company in November 2022 and did not transfer records on this report to another employee. Additionally, the third-party vendor at the time kept busy-out data for 45 days, at which point it was purged. Duquesne Light fully explored all avenues to recover the data, but it was unrecoverable. Duquesne Light is therefore unable to amend the busy-out data for the 2021 and 2022 Quality of Service Reports. On February 13, 2023, Duquesne Light informed the BCS of the issue related to the busy-out data, and BCS staff recommended that the Company file a petition requesting a waiver, *nunc pro tunc*.

If the Commission grants this waiver, Duquesne Light will submit revised Quality of Service reports for 2021 and 2022 that exclude the busy-out rates, pursuant to BCS staff instructions.

Duquesne Light has implemented process improvements to remedy a similar issue in the future. For example, Duquesne Light has distributed the responsibility for downloading and validating busy-out data to multiple team members and business units. Further, the Company is now working with a new third-party phone vendor, which maintains busy-out data for one year. Going forward, Duquesne Light will document the source and calculation methodology for the busy-out data to ensure transparency and consistency across business units.

Given the foregoing, Duquesne Light respectfully requests a waiver of Commission regulation 52 Pa. Code § 54.153(b)(1)(ii), *nunc pro tunc*, for the reporting of the busy-out rate in the 2021 and 2022 Quality of Service Reports.

Please reach out to me or Lindsay Baxter at 412-393-6224 or lbaxter@duqlight.com should you have any questions, comments, or concerns.

Respectfully Submitted,



Michael Zimmerman
Manager & Assistant General Counsel,
Regulatory Law

cc: Certificate of Service

VERIFICATION

I, James J. Fuchs, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief, and I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



James J. Fuchs

Dated: March 27, 2023

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

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