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File #: 175564

July 15, 2024

VIA ELECTRONIC FILING

Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Investigation of PPL Electric Utilities Corporation for potential violations of 52 Pa. Code § 56.1, *et seq.*, of the Commission's regulations and 66 Pa.C.S. § 1501 of the Public Utility Code
Docket No. M-2023-3038060

Dear Secretary Chiavetta:

Under Paragraph 38(b)(6) of the Settlement approved by the Pennsylvania Public Utility Commission's ("Commission") Order entered May 16, 2024 ("*May 2024 Order*"), in the above-captioned proceeding, PPL Electric Utilities Corporation ("PPL Electric") must, within 60 days of the *May 2024 Order*'s issuance, "provide a detailed timeline for implementation and requirements for terms listed in the Settlement at Paragraph 38(b)(6) and file quarterly reports at this docket, with a copy served on the statutory advocates and the Public Utility Law Project, on its progress." *May 2024 Order*, p. 32.

Enclosed for filing on behalf of PPL Electric is a document setting forth the timeline for implementation and requirements for terms listed in Paragraph 38(b)(6) of the Settlement.

Copies are being provided as indicated on the Certificate of Service and in accordance with the *May 2024 Order*.

Respectfully submitted,

Devin Ryan

DTR/dmc
Enclosures

cc: Certificate of Service
Office of Special Assistants (*via Email ra-OSA@pa.gov*)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this filing 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).

VIA E-MAIL

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Date: July 15, 2024

Devin Ryan

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Investigation of PPL Electric Utilities Corporation for potential violations of 52 Pa. Code § 56.1, *et seq.,* of the Commission's regulations and 66 Pa.C.S. § 1501 of the Public Utility Code	: : : : :	Docket No. M-2023-3038060

PPL ELECTRIC UTILITIES CORPORATION'S TIMELINE FOR IMPLEMENTATION AND REQUIREMENTS FOR TERMS LISTED IN PARAGRAPH 38(b)(6) OF THE SETTLEMENT

TO THE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

I. INTRODUCTION

Under Paragraph 38(b)(6) of the Settlement approved by the Pennsylvania Public Utility Commission's ("Commission") Order entered May 16, 2024 ("*May 2024 Order*"), in the above-captioned proceeding, PPL Electric must, within 60 days of the *May 2024 Order*'s issuance, "provide a detailed timeline for implementation and requirements for terms listed in the Settlement at Paragraph 38(b)(6) and file quarterly reports at this docket, with a copy served on the statutory advocates and the Public Utility Law Project, on its progress." *May 2024 Order*, p. 32.

Pursuant to the Commission's *May 2024 Order*, PPL Electric hereby submits this document on the timeline for implementation and requirements for terms listed in Paragraph 38(b)(6) of the Settlement. As set forth herein, the Company instituted or is in the process of developing a series of practices and protocols listed in Paragraph 38(b)(6) to help prevent and insulate the technical issues with the Meter Data Management System ("MDMS") Customer Service System ("CSS") data transfer that caused the issues identified in *May 2024 Order*.

II. TIMELINE FOR IMPLEMENTATION AND REQUIREMENTS LISTED IN PARAGRAPH 38(b)(6)

A. REVISING BACK-OFFICE PROCESSES TO REDUCE THE NUMBER OF NO-BILL AND MULTI-PRIMARY BILLS

PPL Electric took several actions to reduce the number of no-bill and multi-primary bills. These actions have been completed and include:

- Updating disaster recovery plan for business-critical processes, including recovery time and what to do if recovery does not occur within the planned time; and
- Creating Meter to Cash controls dashboard and action plan for reaction and recovery to respond to failures.

Status: Complete

B. EVALUATING THE FORMULA TO CALCULATE ESTIMATES TO DETERMINE IF IMPROVEMENTS CAN BE MADE TO THE ESTIMATION PROCESS

PPL Electric has evaluated its process to estimate bills. During the billing event, meter data was not being transferred to MDMS. This caused the Company to rely on the CSS formula to estimate bills. Under normal operating conditions, MDMS would perform the estimation process when necessary. The primary difference between MDMS estimates and CSS estimates is that MDMS will use all available interval data and only estimate the gaps, whereas CSS estimates the entire billing period regardless of whether there is available data. This makes MDMS inherently more accurate than CSS because it has the ability to use available actual data.

PPL Electric has performed benchmarking to evaluate its billing processes coming out of the billing event. The Company learned that the majority of utilities have stopped utilizing CSS for estimates and only rely on MDMS. Going forward, PPL Electric does not intend to use CSS for estimates, and it will solely rely on MDMS. In the unlikely event that meter data cannot be entered into MDMS, the Company would not force CSS to perform estimates to avoid inaccurate

estimates. Additionally, the Company is planning to upgrade its MDMS. This system upgrade would include: an update of the MDMS application to the latest version; an upgrade of underlying infrastructure to the latest version, including the server operating system and Oracle database version; a migration from an on-premise system to the equivalent hosted Software as a Service ("SaaS") solution provided by the vendor (Landis+Gyr); and a migration from custom legacy interfaces to modern "out-of-the-box" integrations, providing full support from the Company's MDMS vendor. PPL Electric is currently working with its vendor (Landis+Gyr) to define the scope and execute a scope of work. Expected project start is Q4 2024, with total project duration to be 12-14 months.

Status: Ongoing, with completion anticipated late 2025 to early 2026

C. CREATING INTERNAL DAILY CONTROL REPORTS ON ESTIMATED BILLS, MULTI-PRIMARY BILLS, AND DAILY METER READ RATES AND OPERATIONAL METRICS

See Section II.A., *supra*. The newly created Meter to Cash controls dashboard includes reports on estimated bills, multi-primary bills, and daily meter read rates and operational metrics. See Figure 1 below for an example screenshot of the Meter to Cash controls dashboard.

Status: Complete

D. DEVELOPING WORK AROUNDS TO PROCESS METER DATA OUTSIDE OF MDMS WHEN NEEDED

PPL Electric developed a process to streamline the billing of non-demand customers. This process allowed for bills to be sent on actual meter data and is a quicker process, which allows for the system to catch up. This process involves utilizing an off-cycle read request to MDMS to obtain total period reads. The process is not a complete fix in that it does not work for demand customers or customers that require interval usage data for billing. However, the work around process helped solve two problems:

- Processing intervals is the most time-consuming part of the MDMS process, and this work around process bypassed that part for the majority of our customers, greatly increasing the number of bills in a billing run; and
- The Company was behind on billing impacted customers, and if it had not utilized the off-cycle billing processes, then it would have been months before the Company could return to normal billing practices.

Demand and interval usage customers would have their bills delayed until meter data is available. This will avoid the need to cancel/rebill these customers, which is time consuming and confusing. Given that the majority of customers will be addressed by the work around process, the delay in billing interval usage and demand customers will be minimized. The updates to MDMS will also contribute to shortening the system recovery time should a similar event occur again.

PPL Electric is updating MDMS as described in Section II.B., *supra*, to prevent a similar billing event from happening in the future. However, the above-described work around process would greatly minimize the customer impact if another billing event occurred in the future.

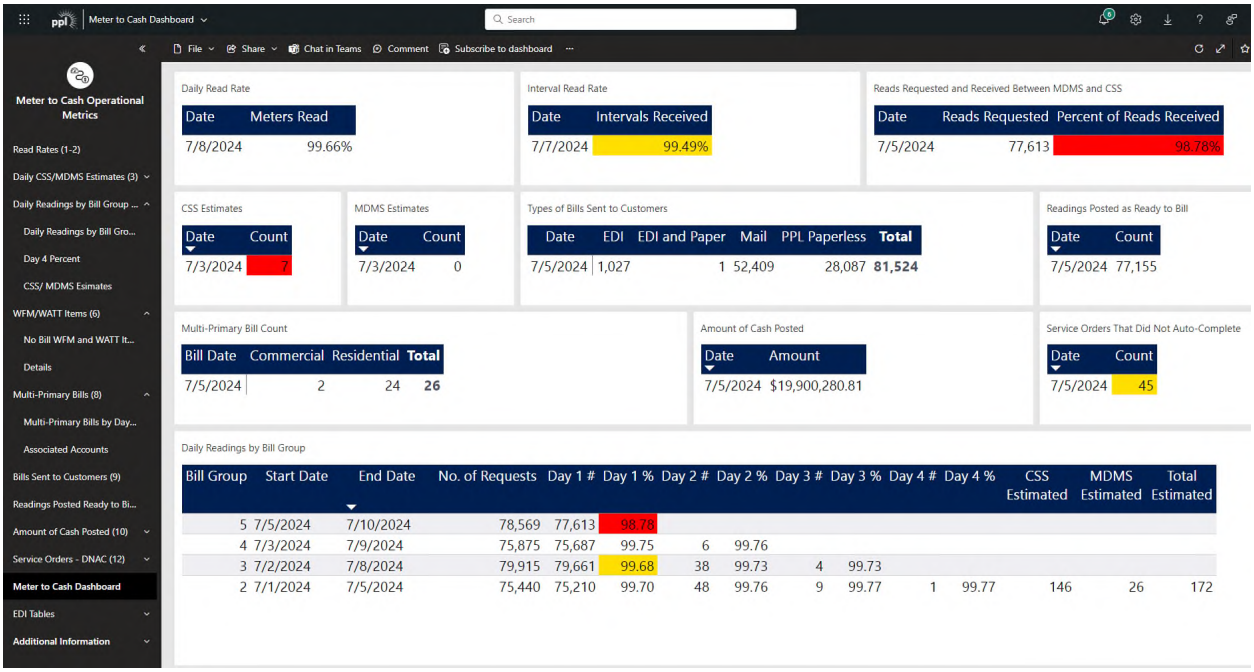
Status: Complete

E. ENRICHING MDMS ESTIMATIONS FOR SCENARIOS WHERE METER DATA IS MISSING TO REDUCE THE TIME PERIOD ESTIMATED

See Section II.B., *supra*.

Figure 1

Meter to Cash Dashboard Screenshots:



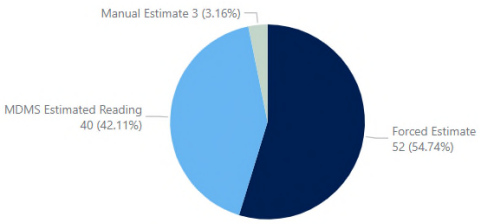
DAILY READINGS BY BILL GROUP

Bill Group	Start Date	End Date	No. of Requests	Day 1 #	Day 1 %	Day 2 #	Day 2 %	Day 3 #	Day 3 %	Day 4 #	Day 4 %	CSS Estimated	MDMS Estimated	Total Estimated
5	7/5/2024	7/10/2024	78,569	77,613	98.78									
4	7/3/2024	7/9/2024	75,875	75,687	99.75	6	99.76							
3	7/2/2024	7/8/2024	79,915	79,661	99.68	38	99.73	4	99.73					
2	7/1/2024	7/5/2024	75,440	75,210	99.70	48	99.76	9	99.77	1	99.77	146	26	172
1	6/28/2024	7/3/2024	77,136	76,724	99.47	217	99.75	15	99.77	0	99.77	180	0	180
20	6/26/2024	7/1/2024	80,841	80,537	99.62	119	99.77	3	99.77	0	99.77	146	36	182
19	6/25/2024	6/28/2024	75,292	75,086	99.73	4	99.73	1	99.73	1	99.73	174	26	200
18	6/24/2024	6/27/2024	74,772	74,534	99.68	71	99.78	11	99.79	0	99.79	97	59	156
17	6/21/2024	6/26/2024	71,087	70,929	99.78	5	99.78	3	99.79	0	99.79	131	19	150
16	6/20/2024	6/25/2024	71,885	71,758	99.82	7	99.83	1	99.83	2	99.84	104	13	117
15	6/19/2024	6/24/2024	76,125	75,953	99.77	9	99.79	1	99.79	3	99.79	119	40	159
14	6/18/2024	6/21/2024	75,869	75,683	99.75	4	99.76	0	99.76	2	99.76	153	27	180
13	6/17/2024	6/20/2024	74,219	73,635	99.21	424	99.78	0	99.78	1	99.79	133	26	159
12	6/14/2024	6/19/2024	70,841	70,605	99.67	64	99.76	2	99.76	0	99.76	135	35	170
11	6/13/2024	6/18/2024	74,639	74,459	99.76	2	99.76	0	99.76	0	99.76	139	39	178
10	6/12/2024	6/17/2024	73,314	73,113	99.73	2	99.73	5	99.74	1	99.74	145	48	193
9	6/11/2024	6/14/2024	70,853	70,696	99.78	3	99.78	1	99.78	0	99.78	117	36	153
8	6/10/2024	6/13/2024	71,626	71,447	99.75	4	99.76	2	99.76	1	99.76	148	24	172
7	6/7/2024	6/12/2024	71,882	71,674	99.71	17	99.73	0	99.73	2	99.74	159	30	189
6	6/6/2024	6/11/2024	74,310	74,141	99.77	11	99.79	3	99.79	0	99.79	134	21	155

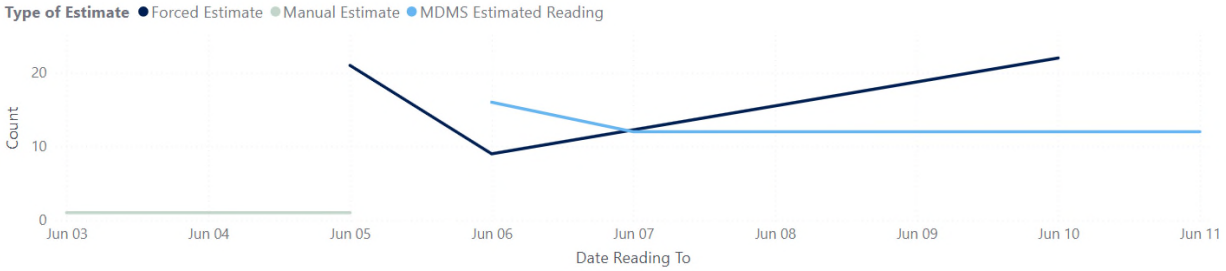
ESTIMATED BILLS BY TYPE

Type of Estimate Counts

Type of Estimate	Count	Percent	Bar Graph
Forced Estimate	52	54.74%	
Manual Estimate	3	3.16%	
MDMS Estimated Reading	40	42.11%	
Total	**95**	**100.00%**	

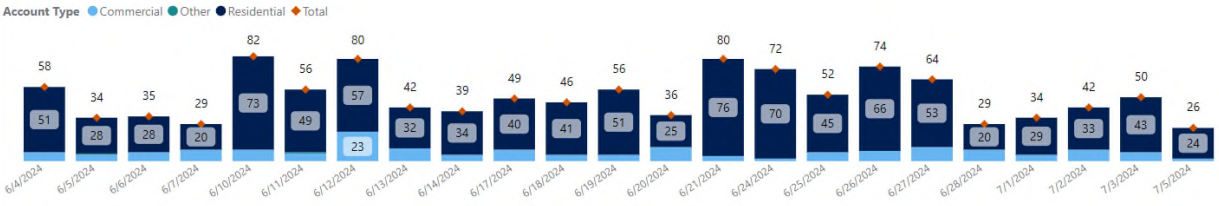


Daily Counts of Estimate Types Over Date Reading To



MULTI-PRIMARY BILLS BY DAY AND BILL GROUP

Daily Bill Count



Daily Bill Count

Bill Date	Commercial	Other	Residential	Total
7/5/2024	2		24	**26**
7/3/2024	7		43	**50**
7/2/2024	9		33	**42**
7/1/2024	5		29	**34**
6/28/2024	9		20	**29**
6/27/2024	11		53	**64**
6/26/2024	8		66	**74**
6/25/2024	7		45	**52**
6/24/2024	2		70	**72**
6/21/2024	4		76	**80**
6/20/2024	11		25	**36**
Total	**175**	**2**	**988**	**1,165**

Sparklines by Bill Group

Show as Table