

John J. Gallagher

Attorney at Law

711 Forrest Road, Harrisburg, PA 17112

Tel. (717) 599-5839

✉ jgallagher@jglawpa.com

January 26, 2012

VIA HAND DELIVERY

Honorable Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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**Re: Petition of Pike County Light & Power For
Approval of Waiver of Certain Standards and
Billing Practices of 52 Pa. Code § 56.1 *et seq***

Dear Secretary Chiavetta:

Enclosed for filing, please find an original and three copies of Pike County Light & Power's Petition in the above referenced matter.

Should you have any questions concerning this filing please contact me at your convenience. Copies of this filing have been served on the parties listed in the attached Certificate of Service.

Sincerely,


John J. Gallagher

Enclosures

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pike County Light & Power Company :
For Approval of Waiver of Certain Standards and : Docket No.: P- _____
Billing Practices of 52 Pa. Code § 56.1 *et seq.* :

**PETITION OF
PIKE COUNTY LIGHT & POWER COMPANY
FOR EXTENSION OF TIME OR WAIVER
OF COMMISSION REGULATIONS**

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I. INTRODUCTION

Pike County Light & Power Company ("PCL&P" or the "Company") hereby submits this Petition for Extension of Time, or, Waiver of Commission Regulations pursuant to the provisions of 52 Pa. Code §§ 1.15 and 5.43 of the Commission's regulations. This Petition seeks Commission approval of an extension of the informal grace period provided by the Public Utility Commission's ("Commission") Bureau of Consumer Services ("BCS") to the compliance deadline set forth in the Commission's order dated June 13, 2011, at Docket No. L-00060182, where the Commission promulgated revisions to 53 Pa. Code § 56.231. In the alternative, PCL&P requests a temporary waiver of the Commission's revisions. This request for an extension of time, or, temporary waiver is needed to permit PCL&P more time to implement the extensive programming modifications to its information system necessary to produce the data required for PCL&P to file the required reports.

In support of its Petition, PCL&P sets forth the following:

II. BACKGROUND

1. PCL&P is an Electric Distribution Company serving approximately 4,700 residential and commercial customers in Pike County, Pennsylvania. PCL&P is a wholly-owned subsidiary of Orange and Rockland Utilities, Inc. ("O&R").¹ O&R provides electric service to approximately 225,000 customers in Orange, Rockland and Sullivan counties in the State of New York. Another subsidiary of O&R, Rockland Electric Company ("RECO"), serves approximately 72,000 customers in the State of New Jersey. PCL&P, O&R, and RECO operate a fully integrated electric system serving parts of Pennsylvania, New York and New Jersey (collectively referred to as the "System"). PCL&P receives all of its electricity through two 34.5 kV radial circuits that cross the Delaware River from Port Jervis, New York.

PCL&P is unique among Pennsylvania utilities. Unlike the other utilities in the Commonwealth, PCL&P, by virtue of being a part of the System, operates in the New York Control Area that is administered by the New York Independent System Operator ("NYISO"). In contrast, the other Pennsylvania electric utilities are members of the PJM Interconnection, LLC ("PJM"). Given its size, location in the far northeast corner of Pennsylvania, and affiliation with the System and NYISO (rather than PJM), PCL&P is plainly a one-of-a-kind electric provider among Pennsylvania utilities. Consequently, in reviewing this Petition, the Commission should consider PCL&P a special case, readily distinguishable from the other Pennsylvania utilities.

2. The name and address of PCL&P's counsel is:

John J. Gallagher, Esquire
711 Forrest Road
Harrisburg, PA 17112

¹ O&R is a subsidiary of Consolidated Edison, Inc.

(717) 599-5830
Attorney ID # 24589
jgallagher@jglawpa.com

3. On June 13, 2011, the Commission entered a Revised Final Rulemaking Order (“Order”) adopting revisions to Chapter 56 of its regulations to coincide with the statutory provisions contained in Chapter 14 of the Pennsylvania Public Utility Code.² The revisions became effective on October 8, 2011 when they were published in the Pennsylvania Bulletin.

4. The BCS informally provided the electric distribution companies (“EDC’s”) a grace period in which to comply with the revisions to the regulations, recognizing that extensive system reprogramming and training would be required of the EDC’s for compliance. The BCS’s informal deadline was set for December 31, 2011.

III. REQUEST FOR EXTENSION, OR TEMPORARY WAIVER

5. The revised regulations at 52 Pa. Code §§ 56.231 necessitate PCL&P to dedicate resources and reprogramming that the Company does not currently have in place. The revisions at Section 56.231 require EDC’s to submit a report to the Commission within 15 days from the end of each month containing 23 separate data compilations for residential accounts. The Company is in the process of arranging for the necessary work to begin for the necessary system restructuring.

6. The Company has had discussions with BCS staff who have suggested a six (6) month extension would be appropriate given the Company’s need for extensive reprogramming of its information systems. BCS staff has stated that it has no objection to PCL&P’s request.

7. Section 1.15 of the Commission’s regulations provide that extensions of time may be granted by the Commission for good cause and upon motion made before the expiration

² 66 Pa.C.S. § 1401 *et seq*

of the period originally prescribed.³ While the BCS provided an informal extension for compliance to December 31, 2011, it has, in discussions with PCL&P, consented to the Company's filing of this Petition based upon the reasons provided by the Company as discussed above.

8. PCL&P is requesting an extension of time to complete the system reprogramming in order to implement the revisions to 52 Pa. Code § 56.231. The Company will not be able to provide all of the information required in Section 56.231 prior to the time that its reprogramming is completed. PCL&P will file, as soon as practicable any data requirements that PCL&P has available for the period from January 1, 2012 through PCL&P's initial filing of the report.

9. PCL&P will be compliant with all revisions to Chapter 56 that are not contingent upon its planned reprogramming.

10. The BCS has recognized that there may be certain revisions which will take longer for certain EDC's to achieve compliance due to reprogramming and various other contingencies and therefore has requested any EDC's that foresee such difficulties at the beginning of 2012 to file a request for an extension of the implementation of the grace period.

11. As stated above, due to the impossibility of implementing the changes required by 52 Pa. Code § 56.231, PCL&P requests an extension of the informal grace period extended by the BCS until August 1, 2012.

12. In the alternative PCL&P requests that the Commission waive the revisions to 52 Pa. Code § 231 on a temporary basis through August 1, 2012 in order to permit the Company to implement the technical modifications necessary to comply with the revised regulation as permitted by the Commission's regulations at 52 Pa. Code § 5.43.

³ 52 Pa. Code § 1.15

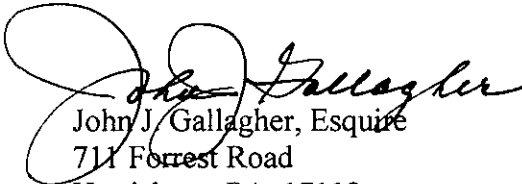
13. Section 5.43 provides that petitions be made to the Commission seeking waiver of regulations to include the interest of the petitioner in the waiver, the sections(s) for which a waiver is sought, and the statutory or other authority involved, as well as the purpose of, and, the facts constituting the grounds for the waiver.

14. PCL&P requests a waiver of 52 Pa. Code § 56.231 on the same basis, as stated above, for which it is requesting an extension of the BCS grace period.

IV. CONCLUSION

PCL&P respectfully requests that the Commission grant this Petition for Extension of Time to August 1, 2012, or, in the alternative, PCL&P requests that compliance with 52 Pa. Code § 56.231 be waived until August 1, 2012 in order for the Company to complete the necessary reprogramming to its system.

Respectfully submitted



John J. Gallagher, Esquire
711 Forrest Road
Harrisburg, PA 17112
(717) 599-5839
jgallagher@jglawpa.com

John L Carley
Assistant General Counsel
Consolidated Edison Company, Inc.
4 Irving Place
New York, New York 10003
Phone: (212) 460-2097
CarleyJ@coned.com

Counsel for Petitioner
Pike County Light & Power Company

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Date: January 26, 2012

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in the manner indicated below, and in accordance with the requirements of § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL

Johnnie E Simms, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Irwin A. Popowsky, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Steven C. Gray, Esquire, Esquire
Acting Small Business Advocate
Office of Small Business Advocate
300 N. Second Street, Suite 1102
Harrisburg, PA 17101

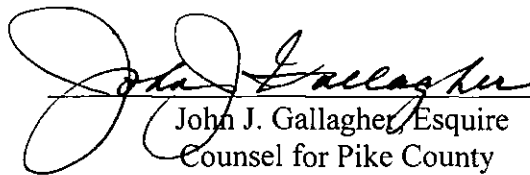
Alexis Bechtel
Director
Bureau of Consumer Services
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

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Dated: January 26, 2011



John J. Gallagher, Esquire
Counsel for Pike County
Light & Power Company
711 Forrest Road
Harrisburg, PA 17112
jgallagher@jglawpa.com