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April 20, 2015

VIA E-FILING

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

**Re: EDC Plan Filings for Seamless Moves and Instant Connects,
Docket No. M-2014-2401126**

Dear Secretary Chiavetta:

Enclosed for filing in accordance with the instructions set forth in the Commission's March 20, 2015 Secretarial Letter issued at the above docket is UGI Utilities, Inc. – Electric Division's ("UGI") Revised Plan for Implementing Seamless Moves and Instant Connects. UGI is not seeking cost recovery at this time, but reserves the right to request cost recovery at a future time as the costs of implementation become clearer.

Copies of this document have been served upon the persons indicated on the attached Certificate of Service.

Very truly yours,

A handwritten signature in blue ink that reads "Mark C. Morrow". The signature is fluid and cursive.

Mark C. Morrow

Counsel for UGI Utilities, Inc. – Electric Division

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDC Plan Filings for Seamless Moves and Instant Connects :
: Docket No. M-2014-2401126

**UGI UTILITIES, INC. – ELECTRIC DIVISION
REVISED PLAN FOR IMPLEMENTING SEAMLESS
MOVES AND INSTANT CONNECTS**

Introduction:

Consistent with the directive in the Commission’s Order in *Investigation of Pennsylvania’s Retail Electric Market: End State of Default Service*, Docket No. I-2011-2237952 (Order entered February 15, 2013), UGI Utilities, Inc. – Electric Division (“UGI”) filed a plan on December 20, 2013 for implementing seamless moves and instant connects on its system by June 1, 2015. Thereafter, in a Secretarial Letter dated August 13, 2014, UGI and other Electric Distribution Companies (“EDC”) were granted an indefinite extension of time for implementation to permit resources to be devoted to other retail market enhancement initiatives. In a March 20, 2015 Secretarial Letter, in turn, UGI and other EDCs were directed to file, on or before April 20, 2015, revised plans for implementing Seamless Moves and Instant Connects by July 1, 2016.

Definitions:

Seamless Move – The ability of a customer’s choice of supplier to move with the customer to a new address without interruption.

Instant Connect – The ability of supply service to start on “day one” of new utility service without the customer first having to go on default service.

Development of Implementation Plan:

UGI conducted an analysis regarding potential issues and possible approaches with respect to implementing seamless moves and instant connects using its existing customer information

system and EDI platform. In designing its implementation plan UGI consulted with other Pennsylvania EDCs, and considered the following key points:

- Possible impacts to existing PJM related scheduling and reconciliation processes
- Handling requests for service prior to the establishment of a new account in the UGI’s information system
- Treatment of enrollment “cancelations” on pending new accounts
- Notification to Electric Supply when the pending account becomes active
- Existing treatment of Commercial/Industrial service activations
- Automatic acceptance of customer move request by supplier
- Prohibition on backdating of connects
- Consistency with pending 814Move EDI transaction (EDEWG)
- No changes to rate class/rate code/tax exempt status
- Supplier drops of seamless moves consistent with existing rules
- Applicability of rescission process

UGI explored a number of potential methods for implementing seamless moves and instant connects before settling on the proposed process shown on the process flowcharts attached below. These process flowcharts will form the foundation for implementing its proposed system and business process modifications.

Rate Eligibility:

Seamless move and instant connect procedures will be applied to the residential and small commercial and industrial (“C&I”) rate schedules shown below; larger C&I customers typically do not move to similarly sized facilities and will be handled on a case-by-case basis by Account Managers.

Customer Group	Rate	Description
Residential	R	Residential Service
	RTU	Residential – Time of Use
C&I	CWH	Controlled Off-Peak Water Heating
	GS-1	General Service – Demand less than 5 kW and consumption less than 15,000 kWh
	GS-5	General Service – (Volunteer Fire Company, Non-Profit Senior Center, Non-Profit Rescue Squad, and Non-Profit Ambulance Service)

Project Schedule:

UGI estimates that it will take approximately twenty-six weeks to implement system changes to facilitate seamless moves. Any significant changes to the preliminary design could impact this time estimate. The chart below represents a high level project schedule showing the key phases of Design, Development and Testing for its Seamless Moves and Instant Connects implementation plan:

Month	16-Jan	16-Feb	16-Mar	16-Apr	16-May	16-Jun
Design	■	■	■			
Development			■	■	■	
Testing					■	■
Training						■

Project Costs and Recovery Method:

UGI estimates that the cost for system changes on its legacy Customer Information System (CIS) to accommodate Seamless Moves and Instant Connects is approximately \$85,000. It should be noted, however, that UGI is in the process of replacing its legacy CIS and there will likely be additional incremental costs to configure the new CIS to accommodate Seamless Moves and Instant Connects. Those incremental costs are undefined at this time. UGI reserves the right to petition for full cost recovery at a later date or to propose recovery of cost in a future base rate proceeding.

Conclusion:

WHEREFORE, UGI respectfully request that the Commission issue an Order accepting UGI's proposed implementation plan for seamless moves and instant connects.

Respectfully submitted,



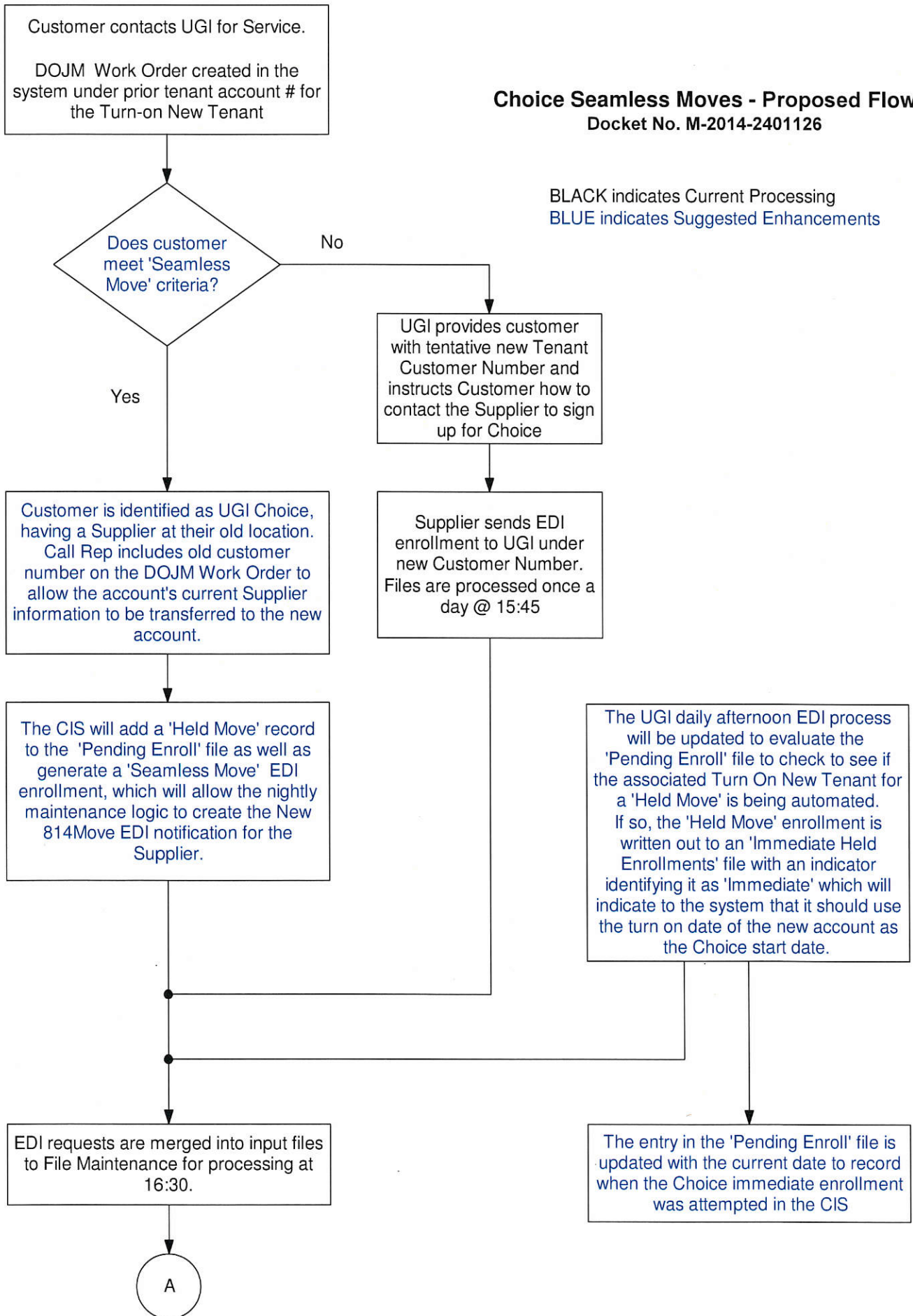
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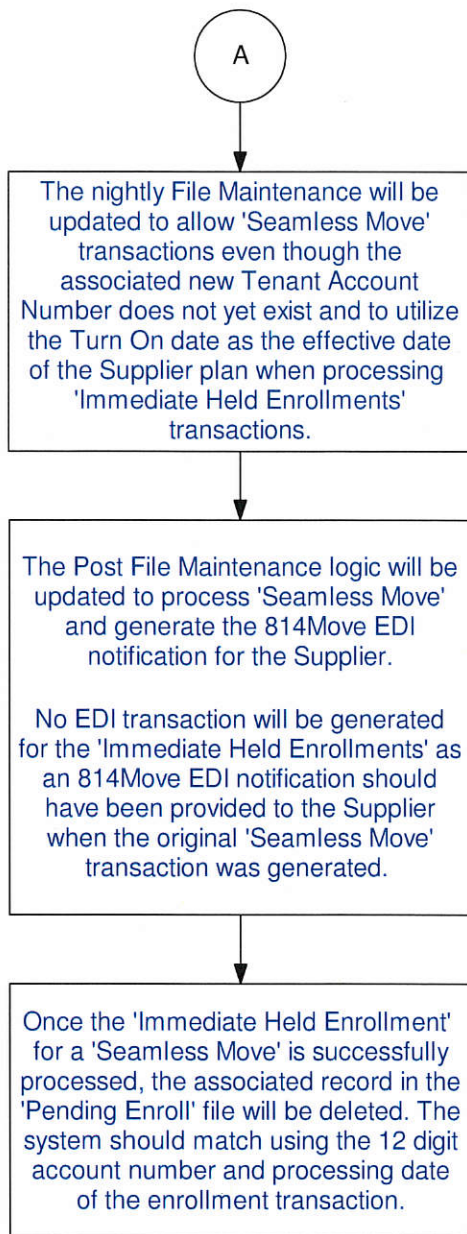
Counsel for UGI Utilities, Inc. – Electric Division

SEAMLESS MOVES
AND
INSTANT CONNECTS
PROCESS FLOWCHARTS

Choice Seamless Moves - Proposed Flow
Docket No. M-2014-2401126

BLACK indicates Current Processing
BLUE indicates Suggested Enhancements





Additional Processing Notes:

The Electric Rates/Supply group will need to know when the 'Seamless Move' transaction is processed as they will need to include it in the Choice energy scheduling.

- If the actual effective date differs from what was in the 'Seamless Move' 814Move EDI notification originally sent to the Supplier, then an EDI 814C needs to be sent to the Supplier informing them of the start date change. The Electric Rates/Supply group will also need to be notified so they can adjust the energy scheduling.

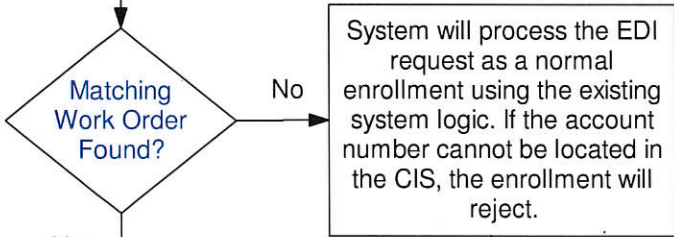
- If a 'Pending Enroll' is voided due to a work order that is cancelled or never automates, an EDI DROP record will be sent to the Supplier to inform them of the failed enrollment. Again, the Electric Rates/Supply group will need to be notified so the Choice energy scheduling can be adjusted accordingly.

Customer contacts UGI for Service.
DOJM Work Order created in the system for the New Service or Meter Set under NEW account number

UGI provides customer with tentative new Account number and instructs customer how to contact the Supplier to sign up for Choice

Supplier sends EDI enrollment to UGI under new Customer Number. Files are processed once a day @ 15:45

New process will look for an open DOJM Work Order (New Service or Meter Set), which is waiting to be processed through the CIS and has an account number that matches the EDI account number



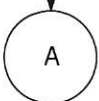
System will process the EDI request as a normal enrollment using the existing system logic. If the account number cannot be located in the CIS, the enrollment will reject.

The EDI enrollment information will be added to the new 'Pending Enroll' file. The enrollment transaction generated in the CIS will be marked as an 'Instant Connect' EDI enrollment, which will allow the nightly maintenance logic to create the normal EDI enrollment acknowledgement for the Supplier.

The UGI daily afternoon EDI process will be updated to evaluate the 'Pending Enroll' file and check to see if the associated New Service/Meter Set is being automated. If so the 'Pending' Enrollment is written out to an 'Immediate Held Enrollments' file with an indicator identifying it as 'Immediate', which will indicate to the system that it should use the turn on date of the account as the Choice start date.

EDI requests are merged into input files to File Maintenance for processing at 16:30.

The entry in the 'Pending Enroll' file is updated with the current date to record when the Choice immediate enrollment was attempted in the CIS.



Choice Instant Connect - Suggested Flow

Docket No. M-2014-2401126

- BLACK indicates Current Processing
- BLUE indicates Suggested Enhancements

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The nightly File Maintenance will be updated to allow 'Instant Connect' transactions even though the associated new Account Number does not yet exist and to utilize the Turn On date as the effective date of the Supplier plan when processing 'Immediate Held Enrollments' transactions.

The Post File Maintenance logic will be updated to process 'Instant Connects' and generate the associated enrollment response transaction for the Supplier.

No EDI transaction will be generated for the 'Immediate Held Enrollments' as an 'Instant Connect' response should have been provided to the Supplier when the Enrollment EDI was originally received.

Once the 'Immediate Held Enrollment' is successfully processed, the associated record in the 'Pending Enroll' file will be deleted. System should match using the 12 digit account number and processing date of the enrollment transaction.

Additional Processing Notes:

- The Electric Rates/Supply group will need to know when an 'Instant Connect' transaction is received as they will need to include it in the Choice energy scheduling.
- If the actual effective date differs from what was in the 'Instant Connect' EDI reply originally sent to the Supplier, then an EDI 814C needs to be sent to the Supplier informing them of the start date change. The Electric Rates/Supply group will also need to be notified so they can adjust the scheduling.
- If a 'Pending Enroll' is voided due to a work order that is cancelled or never automates, an EDI DROP record will be sent to the Supplier to inform them of the failed enrollment. Again, the Electric Rates/Supply group will need to be notified so the Choice energy scheduling can be adjusted accordingly.
- Currently Commercial & Industrial 'New Service/Meter Sets' are not automated in our system. They are entered manually. The processing suggested in the above flow should handle both automated and manual sets.

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

EDC Plan Filings for Seamless Moves and Instant Connects :
: Docket No. M-2014-2401126

CERTIFICATE OF SERVICE

I hereby certify that I have, this 20th day of April, 2015, served a true and correct copy of the foregoing document in the manner and upon the persons listed below:

VIA FIRST CLASS MAIL:

Office Of Consumer Advocate
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Harrisburg, PA 17101-1921

Office of Small Business Advocate
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Harrisburg, PA 17101

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120



Mark C. Morrow