

Implementation Plan
Mt. Carmel Public Utility Co.
Revision of 83 Ill. Adm. Code 280

December 29, 2014

Mt. Carmel Public Utility Co. (MCPU) is a small electric and gas utility located in Mount Carmel, Illinois with approximately 5,500 electric customers and 3,400 gas customers. Many of our customers interact with the MCPU staff by walking into the office or via phone. This allows for many processes to be performed manually today. In anticipation of the Order in ICC Docket 06-0703 (subsequent to analysis of the proposed rule changes), MCPU had determined the current Customer Information System and billing software (collectively referred to as "CIS") would not allow MCPU to meet all the requirements of Revised Part 280. MCPU has evaluated a new software vendor and is scheduled for a December 1, 2015 implementation thereof. Following implementation of the new CIS, the Company expects it will be able to comply with the requirements of Revised Part 280 as described below.

Upon receiving the final Order and the Revision of 83 Ill. Adm. Code 280, MCPU performed a high level review and determined that an additional, dedicated resource was necessary to meet this timeline and to implement the requirements of Revised Part 280 as well as the new CIS. A Project Manager with a utility background was contracted to assist in this project.

The estimated costs of implementing the requirements in the current Part 280 include the following:

New CIS Hardware, Software, and Installation	\$236,000
Custom Programming (TBD – Estimate)	50,000
Website Modifications (TBD – Estimate)	1,000
MCPU Labor Costs (Estimate)	50,000
Consulting Fees for Project Manager	<u>130,000</u>
Estimated Cost of Implementation	\$467,000

Each requirement of the Revised Part 280 was reviewed and evaluated against the current Part 280 and practices of MCPU. If the requirement was met in the current practice it was considered a "FIT." If the current practice requires a change to meet the requirement, it was considered a "GAP." An initial evaluation was made as to what type of change was required to bring the GAPs compliant with the Revised Part 280. These changes include the following:

Process – the creation of or modification to an existing formal MCPU procedure

Existing system – a modification to the existing software system

Website – a modification to the existing MCPU website

Other – any other action required, such as creation or revision to an existing MCPU form, need to file a new or revised tariff, etc.

New system – requirements will be met with the implementation of the new software system in December, 2015.

The timeline below indicates the month in which MCPU expects to be compliant with requirements in corresponding sections of the Revised Part 280. In every case, MCPU evaluated any method to comply with the Order as soon as practical, including a manual process to facilitate compliance. Within each section multiple types of change may be required. In determining the timeline several factors were considered:

Resource availability – MCPU is a small utility and therefore has limited additional resources. While the consultant will take on much of the work of developing procedures and drafting documentation, MCPU staff will actively participate in the development and training of the new procedures and documents. In addition, during the same time the Company is working to implement procedural changes to comply with the rules reflected in the Revision of Part 280, the implementation of the new CIS software will be taking place. The Company sees both the conversion to the new software and the development of new rules and procedures as part of this overall implementation plan.

Priority - The changes required in the Revision of Part 280 predominately include requirements that provide more consideration for the customer, and therefore the Company understands the desire of all parties (including MCPU) to move as quickly as practical to provide the information and considerations required. The Company has not weighted the priority toward the interests of MCPU. Instead, MCPU has considered dependencies between the processes, season of the year (Winter Heating, etc.), and dependency on implementation of the new software system.

New software implementation – If a requirement necessitated a programming change to the existing system, both because of the cost and time delay for requesting custom programming, MCPU has chosen to incorporate the requirement into the development process associated with the implementation of the new CIS. Prior to the final Order in this case, MCPU began reviewing a new vendor and has signed a letter of intent, however, the date for implementation of the CIS is December, 2015. This is still within the compliance period for the Order and prevents MCPU from incurring the additional expense of having the change made in both existing and new software systems. Based on the past experience with the current vendor, when both time constraints of their staff and costs are considered, it seems prudent to incur the cost once during the conversion and implementation instead of twice.

The plan below itemizes our plan to bring GAPS into compliance.

Task	Due Date/Status
Review the new Order	Complete
Evaluate resource needs	Complete
Contract Project Manager to manage the implementation	Complete
Analyze each requirement against existing MCPU practices	Complete
Define & document Fit/Gap	Complete
Determine high level solution to meet Gap <ul style="list-style-type: none"> - Procedures - Existing system - Website - New system 	Complete
Estimate duration to complete each solution & prioritize	Complete
Implementation Plan due to Illinois Commerce Commission	Complete
Upon approval of Implementation Plan status updates to start 120 days following	TBD
Implement changes prior to New System implementation	
A – Application	
B-280.30 Applicant Gaps: 280.30b, 280.30d4, 280.30f3, 280.30f4, 280.30f6, 280.30g, 280.30i, 280.30j3, 280.30j4, 280.30j5, 280.30j8, 280.30k	November 2014 February 2015
B-280.35 Revert to Landlord/Property Manager Agreements Gaps: 280.35a, 280.35b, 280.35c, 280.35f	November 2014 August 2015
C – Deposits	
C-280.40 Deposits Gaps: 280.40b2, 280.40d, 280.40f, 280.40h, 280.40h2, 280.40i1, 280.40i2, 280.40i3 Gaps: 280.40g2, 280.40j2 Bill print requirements	November 2014 May 2015 December 2015
C-280.45 Deposits for Low Income Customers Gaps: 280.45a, 280.45b, 280.45c	November 2014 March 2015
D - Regular Billing	
D-280.50 Billing Gaps: 280.50b, 280.50c2 Gaps: 280.50c1, 280.50c3, 280.50c5, 280.50d2, 280.50d3, 280.50f Billing print & electronic mailing & third party mailing requirements	November 2014 April 2015 December 2015
E – Payment	
E-280.60 Payment Gaps: 280.60c1, 280.60c2 Gaps: 280.60b2, 280.60d2 Bill print & calculation coding requirements	November 2014 June 2015 December 2015
E-280.65 Late Payment Fee Waiver for Low Income Customers Gaps: 280.65b Gaps: 280.65a, 280.65c Coding for Low Income requirements	November 2014 March 2015 December 2015
E-280.70 Preferred Payment Date	November 2014

Task	Due Date/Status
Gaps: 280.70b	February 2015
E-280.80 Budget Payment Plan Gaps: 280.80c, 280.80g1, 280.80g2, 280.80h, 280.80j, 280.80k2	November 2014 February 2015
F - Irregular Billing	
F-280.90 Estimated Bills Gaps: 280.90b3, 280.90c2, 280.90d3 Gaps: 280.90f2, 280.90f3 Bill print requirements	November 2014 July 2015 December 2015
F-280.100 Previously Unbilled Service Gaps: 280.100c Manual work around Gaps: 280.100c Bill print requirements	November 2014 November 2015 December 2015
G - Refunds and Credits	
G-280.110 Refunds and Credits Gaps: 280.110d, 280.110f3	November 2014 June 2015
H - Payment Arrangements	
H-280.120 Deferred Payment Arrangements Gaps: 280.120b1, 280.120g1, 280.120i1, 280.120j2 Gaps: 280.120e1, 280.120e2 Bill print requirement	November 2014 May 2015 December 2015
H-280.125 Deferred Payment Arrangements for Low Income Customers Gaps: 280.125b1, 280.125b2, 280.125c1, 280.125c2, 280.125d, 280.125e1, 280.125e2, 280.125e3 Procedural & manual work arounds Gaps: 280.125b1, 280.125b2, 280.125c1, 280.125c2, 280.125d, 280.125e1, 280.125e2, 280.125e3 Automatic processing	November 2014 May 2015 December 2015
I - Disconnection	
I-280.130 Disconnection of Service Gaps: 280.130b, 280.130c, 280.130d, 280.130f, 280.130g2, 280.130h, 280.130i1, 280.130i2, 280.130i3, 280.130j1, 280.130j2, 280.130k2, 280.130m, 280.130q, 280.130r	November 2014 July 2015
I-280.135 Winter Disconnection of Residential Heating Services Gaps: 280.135a, 280.135b1, 280.135b2, 280.135b3, 280.135c, 280.135d, 280.135g, 280.135j1, 280.135j2, 280.135j3 Procedural & manual work arounds Gaps: 280.135g Automatic processing	November 2014 August 2015 December 2015
J - Medical Certification	
J-280.160 Medical Certification Gaps: 280.160a, 280.160b, 280.160c, 280.160d, 280.160e2, 280.160f1, 280.160g, 280.160h, 280.160j Gaps: 280.160i1, 280.160i2 Bill print requirements	November 2014 June 2015 December 2015
K - Reconnection	
K-280.170 Timely Reconnection of Service Gaps: 280.170b1, 280.170f	November 2014 June 2015
K-280.180 Reconnection of Former Residential Customers for the Heating Season Gaps: 280.180b, 280.180e2, 280.180h Gaps: 280.180b Bill calculation & printing	November 2014 August 2015 December 2015
L - Unauthorized Service Usage	

Task	Due Date/Status
L-280.190 Treatment of Illegal Taps Gaps: 280.190e4	November 2014 September 2015
L-280.200 Tampering Gaps: 280.200d, 280.200e	November 2014 October 2015
L-280.220 Payment Avoidance by Location Gaps: 280.210d1, 280.210d2, 280.210d4, 280.210d5, 280.210d6, 280.210d7, 280.210e, 280.210f, 280.210g	November 2014 October 2015
M - Complaint Procedures	
M-280.220 Utility Complaint Process Gaps: 280.220f3, 280.220i1, 280.220j, 280.220l	November 2014 October 2015
N - Information	
N-280.240 Public Notice of Commission Rules	January 2015
N-280.250 Second Language Requirements	February 2015
N-280.260 Customer Information Packet Gaps: 280.260b1, 280.260b2, 280.260c1, 280.260c2, 280.260c3, 280.260c4, 280.260d	December 2015
Appendix A - Disconnection Notice	February 2015
Appendix B - Customer Rights Insert for Disconnection Notice	January 2015
Appendix C – Public Notice	February 2015
Appendix D - Disconnection Notice Insert for Residential Gas & Electric Customers	November 2015

In performing its analysis, MPCU broke the Revised Part 280 into 377 requirements. MPCU has identified 143 processes that contain GAPS which require additional actions to demonstrate compliance with Revised Part 280, and 234 requirements for which MPCU was fully compliant in November, 2014.

While this is MPCU’s official Implementation Plan, as stated above, MPCU will manually comply with the Revised Part 280 in circumstances where a manual work around is available.

As required, an Implementation Checklist will be updated periodically per the Revised Part 280 to reflect the status against this plan. A sample of the Implementation Checklist is included as Appendix A hereto and made part of this Implementation Plan filing.

Appendix A

SAMPLE Implementation Checklist
Mt. Carmel Utility Co.
(618)-262-5151

Task	Due Date/Status	Revised Order 280	Previous Order 280 Reference
Implement changes prior to New System implementation			
A – Application			
B-280.30 Applicant	Complete November 1, 2014		
Gaps:			
280.30b	February 2015	Information Requirements	N/A
280.30d4	February 2015	Service location and contact information required of applicants	N/A
280.30f3	February 2015	Past due debts	280.50b
280.30f4	February 2015	Past due debts	N/A
280.30f6	February 2015	Payment plan for past due debts	N/A
280.30g	February 2015	Disputed Past Due Debts	N/A
280.30i	February 2015	Timeline for Application Processing	N/A
280.30j3	February 2015	Timeline for Application Processing	N/A
280.30j4	February 2015	Timeline for Application Processing	N/A
280.30j5	February 2015	Exception for lack of access	N/A
280.30j8	February 2015	Timeline for Application Processing	N/A
280.30k	February 2015	Data Collection and Maintenance Requirements	N/A