

Liberty Utilities Implementation Plan for Part 280

Executive Summary

Liberty Utilities is a natural gas distribution utility that serves approximately 20,000 customers in Illinois. We have three offices located in Virden, Vandalia and Harrisburg, Illinois that are open to the public. Our customers can conduct all of their business with us in the office, including paying bills, having questions answered and resolving complaints. Of course, Liberty Utilities also offers full telephone and internet services if the customer does not want to personally visit our local offices.

In accordance with the Illinois Commerce Commission's recent revisions in Docket 06-0703 to its Part 280 rules concerning certain customer service and relationship standards, Liberty Utilities has quickly moved to identify and implement the requirements within the time specified by the Commission. In fact, Liberty Utilities is already far along in implementing the rule. As of the initiation of the implementation plan, Liberty Utilities has identified that it is already compliant with 351 sections of Part 280. We have proposed specific implementation efforts with respect to the remaining 104 sections of the rule that will require further changes. We consider some of these changes to be "low hanging fruit" that we can put in place with policy changes and employee training. Certain other sections will require extensive work in developing processes, CIS modifications and bill print changes that will require development and cooperation by outside vendors in order to meet the timelines.

Our implementation plan lists each relevant section of the rule and indicates whether the Company has already achieved compliance, or the expected final implementation date, as applicable. We believe our implementation plan reflects an aggressive yet realistic program to achieve full compliance within the time periods specified by the Commission.

In accordance with the Commission's requirements, we have included estimates of our expected cost of implementing the changes identified in the plan. The cost estimates include estimates by expense category such as Cogsdale (our CIS vendor), Fiserv (our billing vendor), training, testing etc. The Company would like to emphasize that its cost estimates are high level estimates and may vary significantly based on actual implementation costs. In particular, due to time constraints vendor estimates could not be obtained prior to the filing deadline. We also note that these costs do not include costs that have already been incurred prior to the filing of the implementation plan.

In accordance with Section 280.15, Liberty Utilities will submit updates every 120 days following initial approval until full compliance is reached. In addition, the Company will post an implementation checklist on its website.

Any questions regarding this filing may be directed to:

Steve Green | Liberty Utilities | Sr. Manager, Customer Care and Marketing
O: 573-755-0096 | C: 573-225-7837 | F: 573-243-1531
E: Charles-Steve.Green@libertyutilities.com
2751 N. High St, Jackson, MO 63755

Rule 280 – Implementation Plan - version 1, 30Dec2014

Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart A: General	Section 280.20	DEFINITIONS	280.20	"Low Income Customer" means a residential customer who has qualified under the income criteria of Section 6 of the Energy Assistance Act of 1989 [305 ILCS 20/6]. Qualification is effective for purposes of this definition when the Low Income Home Energy Assistance Program (LIHEAP) administrator notifies the customer's utility of the customer's low income status. Unless water and sewer utilities begin participation in a low income assistance program with the LIHEAP agencies, it shall be the individual customer's responsibility to notify and provide proof to the water and/or sewer utility of the customer's low income status under the income criteria of Section 6 of the Energy Assistance Act of 1989. Qualifications established on or after September 1 shall remain effective for purposes of this definition until December 31 of the following year. Qualifications established before September 1 shall remain effective until December 31 of that same year. The utility shall notify the customer 30 through 90 days prior to the expiration of a customer's qualification.	There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65, 280.125) Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms Need to record and track in Customer Information System	1. Define requirement/policies 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart A: General	Section 280.20	DEFINITIONS	280.20	"Medical Payment Arrangement" or "MPA" means a payment plan established after the use of a medical certificate under which a customer may retire a past due amount owing to a utility by paying installments towards the arrearage in addition to paying future bills.	<p>The items related to payment arrangements in section 280.100, 280.120, 280.160 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation.</p> <p>Need to configure CIS and test.</p> <p>Need to train staff</p> <p>Need to create/update forms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Design/Configure CIS 3. Update business process/policy documentation 4. Test Configuration 5. Train staff 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart A: General	Section 280.20	DEFINITIONS	280.20	"Past Due" means any amount unpaid for more than two days beyond the due date on a customer's utility account bill statement.	<p>The items related to section 280.45 b2 (late fee) and 280.60, 280.65 (waiver late fee) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. The timing is linked to the due date/preferred due dates changes in section 280.50/280.70 to leverage testing efforts as the changes for due date/late fee are interrelated when testing.</p> <p>2 grace days is currently in place. However with the updates to due date due to new rules listed above, will also review/test ensure this continues to be in place.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to update CIS systems/bill print</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop/Design CIS configuration 3. Update business process/policy documentation 4. Test config/process and bill image 5. Train staff 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 a) & b)	Intent: A utility may use reasonable means to verify the identity of its customers. Applicants shall have the right to a reasonable application process designed to provide for persons to obtain utility services without delay, while also safeguarding utilities and other customers from potential harm associated with fraud or the uncollected debts of applicants.	The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms	1. Define requirement/policies 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 c) 1)	Methods: The applicant shall have the option to choose from the available application methods offered by the utility.	The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms	1. Define requirements 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement - rollout web/reports to production	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 c) 2)	Third party applications may be made only by persons who have been authorized to act on behalf of the applicant, and the utility must verify this authorization either by documentation or by direct contact with the applicant. If a utility fails to verify authorization, it shall not be entitled to collect for service if the customer disclaims any responsibility for requesting the service; provided, however, that named customers who reside and receive mail at the service/billing address will be rebuttably presumed to have authorized the application if they do not contact the utility to contest billing within six months after service activation.	The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms	1. Define requirements 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement - rollout web/reports to production.	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 d) 1) 2) 3) 4) A) B) C) D) E)	Application Content:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 d) 4) F)	Application Content: Contact information for property owner/manager if premises are rental (optional).	The items related to section 280.30 d4f and 280.35 (Revert to Landlord) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to create forms Need to train staff	1. Define requirement/policies 2. Develop/Design CIS configuration 3. Update business process/policy documentation 4. Test CIS configuration 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 c) 1) 2) A) B) C)	Requirements for Successful Application:			Prior to Dec 31, 2014	In Place
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 f) 1) A) B) C) D) 2) 3)	Applicable Past Due Debts:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 f) 4)	Past due debts shall not include debts owing by persons other than the applicant, with the exception of debts owing as family expenses of married persons. Family expenses shall not include debts incurred at a location separate from the family by a spouse who abandons the family (see Section 15 of the Rights of Married Persons Act [750 ILCS 65/15]).		<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 f) 5)	This subsection (f) shall not prevent a utility from considering past due debts when evaluating applications or pursuing collections if those past due debts accumulated before November 1, 2014, and if the utility kept records to document the past due debts as were allowed at the time the debts were accumulated.			Prior to Dec 31, 2014	In Place
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 f) 6)	In instances in which the utility decides not to offer a payment plan for past due debts, it must provide a written statement to the applicant that contains the rationale for its refusal.	<p>The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 g)	Disputed Past Due Debts:			Prior to Dec 31, 2014	In Place
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 h)	Deposit Payment Requirement: The utility may require a deposit of an applicant for service under the criteria listed in Sections 280.40 (Deposits) and 280.45 (Deposits for Low Income Customers). The utility may require that the initial down payment of any applicable deposit be paid within a minimum of 12 days.	The items related to Deposits in section 280.30 and 280.40 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms/letters	1. Define requirements 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 i) 1) 2) 3)	Notification shall include the specific reasons for the rejection so that the applicant may have the opportunity to remedy the reasons for the rejection. If the utility is unable to contact the applicant for notification purposes by a method other than mailing, written notification of the problems shall be sent to the mailing address provided by the applicant.	The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms	1. Define requirements 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 j) 1) 2) 3)	Timeline for Service Activation:			Prior to Dec 31, 2014	In Place
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 j) 4)	If, through no fault of the applicant, the utility delays activation of service for two or more calendar days beyond the number of days required by this subsection (j), it shall issue a credit to the new customer's account equal to the monthly customer charge for that customer pro-rated by the number of days of the delay beyond the requirements of this subsection (j).	The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to add CIS configuration/test	1. Define requirements 2. Design Configuration 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 j) 5) 6)	Exception for lack of access: and Exception for damage or unsafe condition:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 j) 7) 8)	Temporary exception for unforeseen circumstances: and Reporting to the Commission's Consumer Services Division.	<p>The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.30	APPLICATION	280.30 k) 1) 2) 3) 4) 5)	<p>Data Collection and Maintenance Requirements: A utility shall collect the following data on a monthly basis and maintain the data for two years following its collection, making the data available to Commission Staff within 30 days after a request from Staff:</p> <p>1) The total number of residential applications taken by the utility; 2)The total number of non-residential applications taken by the utility; 3) The number of residential applications rejected by the utility. For purposes of this subsection (k), applications for service that are not accepted by the utility because the applications are incomplete shall be considered rejected applications; 4)The number of non-residential applications rejected by the utility; and 5)The reason, by category under subsection (e), for the rejection of each application listed in subsections (k)(3) and (4).</p>	<p>The items related to section 280.30 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms</p>	<p>1. Define requirements 2. Develop forms/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement</p>	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.35	Revert to Landlord/Property Manager Agreements	280.35 a)	Intent:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.35	Revert to Landlord/Property Manager Agreements	280.35 b)	Prearrangement to be in Writing: The utility and landlord/property manager shall agree in writing to the prearranged procedures entered into under this Section. The utility shall provide an example of its prearrangement form in the utility's tariff and maintain a copy of the form on its website. Absent written prearrangement with a landlord/property manager, the utility shall not place service in the name of the landlord/property manager unless the landlord/property manager contacts the utility to apply for service.	<p>The items related to section 280.30 d4f and 280.35 (Revert to Landlord) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to create forms Need to train staff</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop new form /Design CIS configuration 3. Update business process/policy documentation 4. Test configuration/process and bill image 5. Train staff 6. Implement and rollout form to web 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.35	Revert to Landlord/Property Manager Agreements	280.35 c)	Notice: Every time a utility places service into the responsibility of a landlord/property manager under prearrangement, the utility must, within two business days, notify the landlord/property manager that the service has been placed in the landlord/property manager's responsibility and that the landlord/property manager will be billed on a forward basis for service provided to the premises until a new tenant successfully applies for service. Notice shall be provided separately from the bill statement and shall be made prior to the first bill to the landlord/property manager. By agreement with the landlord/property manager, the utility may disregard the above notification provisions.	The items related to section 280.30 d4f and 280.35 (Revert to Landlord) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Due to requirement to update CIS/, additional vendor development, testing effort required. This will be implemented later than the other rules in section 280.35 Also need to develop /update business process/policy and related documentation. Define communication Need to train staff	1. Define requirement/policies 2. Design/Develop systems 3. Update business process/policy documentation 4. Test systems 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart B: Applications for Utility Service	Section 280.35	Revert to Landlord/Property Manager Agreements	280.35 d)	Tenant Bills: The utility shall not hold the landlord/property manager responsible for an amount owing to the utility by any tenant.			Prior to Dec 31, 2014	In Place
Subpart B: Applications for Utility Service	Section 280.35	Revert to Landlord/Property Manager Agreements	280.35 e)	Accuracy of Billing: Prior to making the landlord/property manager responsible for service, if the meter has not been read by the utility within the past 60 days, the utility shall obtain an actual meter reading to ensure correct billing, so long as the utility is provided access to the meter. If the utility is unable to obtain an actual meter reading, the utility must allow the landlord/property manager to provide the utility with a customer reading.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart B: Applications for Utility Service	Section 280.35	Revert to Landlord/Property Manager Agreements	280.35 f)	Itemization of Transfer Balances: When a landlord/property manager maintains multiple premises within a utility's service territory, the utility shall not transfer balances owing from one premises account to another until the landlord/property manager has failed to pay the final bill rendered for that premises or the landlord/property manager requests that the balance be transferred. When transferring final balances from one premises account to another, the utility shall indicate on the bill the location where the amount due originated.	<p>This will be implemented later than the other rules in section 280.35 as it will require system changes.</p> <p>This requirement will be tied into the other rules which bill print changes scheduled for Q1 2016. Need to confirm time with vendors as to available resources during this period. Also need to develop /update business process/policy and related documentation. Need to develop and test bill print changes Need to train staff Also develop/rollout Customer Communication</p>	<ol style="list-style-type: none"> 1. Requirements 2. Vendor development (CIS/Bill print vendor) 3. Test changes 4. Training 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 a) b) 1) 2) A) B) C) D) E) F) G) H) I)	Deposit:, Notification of Demand for Deposit: The initial deposit notice shall be made in writing and shall disclose:	The items related to Deposits in section 280.30 and 280.40 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms/letters	1. Define requirements 2. Create /Define letter 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 c) 1)	Calculation of Deposit Amounts: Residential and small business customer deposits shall not exceed 1/6 of the estimated annual charges for the service to that customer.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 c) 2)	Non-residential, other than small business, customer deposits shall not exceed 1/3 of the estimated annual charges for service to that customer			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 d) 1)	Applicant Deposits: The applicant was previously disconnected for non-payment of bill amounts owing to the utility for the same class and type of service;			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 d) 2)	The applicant failed to pay a final bill owing to the utility for the same class and type of service;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 d) 3)	The residential applicant's credit score fails to meet the minimum standard of the credit scoring system described in the utility's tariff;				N/A
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 d) 4)	The non-residential applicant fails to provide satisfactory credit references, including past utility service records or favorable history with other creditors. The utility shall file a tariff with the Commission describing its criteria by which non-residential applicants can establish satisfactory credit for this purpose;	The items related to Deposits in section 280.30 and 280.40 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirements 2. Update business process/policy documentation 3. Train staff - 4. Implement, submit for tariff	Q1 2016	Not Started
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 d) 5)	The utility has proof that the applicant previously benefitted from tampering as described in Section 280.200;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 d) 6)	The utility has proof that the conditions described in Section 280.210 (Payment Avoidance by Location) exist for the applicant.	The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms	1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 e) 1) A) B) 2)	Present Customer Deposits :A present customer may be required to pay a deposit if both of the following conditions occur: 1) The customer has paid late four times in the past 12 months; and 2) The customer's account has an undisputed past due balance that has remained unpaid for over 30 days beyond the due date.	The items related to Deposits in section 280.30 and 280.40 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to create a report/or system change to identify accounts. Need to create letter Need to train staff	1. Define requirements 2. Create report/or modification for CIS 3. Update business process/policy documentation 4. Test report 5. Train staff 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS		A present customer may be required to pay a deposit if the utility has proof that the customer benefitted from tampering.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 e) 4)	A present large commercial or industrial customer may be required to pay a deposit for indications of financial insecurity in accordance with, and as allowed by the terms and conditions of, a utility's effective tariffs. a deposit for indications of financial insecurity in accordance with, and as allowed by the terms and conditions of, a utility's effective tariffs.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 f)	Deposit Payment: A utility may require payment of 1/3 of an applicable deposit by including that amount on the first bill statement sent to the customer after the issuance of the deposit. The remaining 2/3 of the deposit shall be paid in equal installment amounts included on the next two bill statements. However, a deposit assessed under Section 280.210 may be collected in a single amount due prior to service activation.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 g) 1)	Deposit Interest: Interest shall be paid to the customer on all deposit amounts, including installments, held by the utility. The rate of interest will be the same as the rate existing for the average one year yield on U.S. Treasury Securities for the last full week in November. The interest rate will be rounded to the nearest 0.5%. In December each year, the Commission shall announce the rate of interest that shall be paid on all deposit amounts held during all or part of the subsequent year.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 g) 2)	After 12 consecutive months of accumulated interest, when a customer is not entitled to a refund of the deposit, the utility shall automatically credit the customer's account with the interest only. The credit shall be itemized on the customer's next regular bill statement as "deposit interest".	This requirement is part of current Liberty Utilities bill presentment project which is scheduled to be implemented Apr 30,2015	1. Requirements - Completed Dec 2014 2. Vendor development - (CIS/Bill print vendor) - Jan/Feb 2015 3. Test changes - March/Apr 2015 4. Implement - Apr 30,2015	30-Apr-15	In Progress
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 h) 1)	Refund Conditions for Deposits: The utility shall automatically refund the deposit plus accumulated interest once the customer completes 12 consecutive months of service with fewer than four late payments, no disconnections for nonpayment and no tampering with the service, if the customer has no past due balance owing at the time of the deposit refund.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 h) 2)	The utility shall automatically refund the deposit plus accumulated interest, less any unpaid utility service bill amount, when the customer voluntarily ends service and is not transferring service to another location. The refund shall be made at the time the final bill for service is issued.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 h) 3)	The utility shall refund the deposit plus accumulated interest automatically, less any unpaid utility service bill amount, 30 days after disconnection of service for non-payment when the former customer has not paid the full balance owing or otherwise made arrangements with the utility to have the service restored.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 h) 4)	Nothing shall prevent the utility from refunding a deposit earlier than required by this subsection (h).			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 i) 1)	Issuance of Deposit Refund: For a current small business customer, the refund, less past due unpaid utility service amounts, shall be by separate payment issued to the customer. The refund or credit shall be issued within 30 days after the event that triggers it.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 i) 2)	For all other current customers, the refund, less past due unpaid utility service amounts, shall be by separate payment issued to the customer, except when the customer requests a credit to the account instead of a refund payment. The refund or credit shall be issued within 30 days after the event that triggers it. The utility shall not be obliged to issue the refund by separate payment instead of a credit if the amount to be refunded does not exceed 125% of the customer's average monthly bill amount.	The items related to Deposits in section 280.30 and 280.40 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Due to the prioritization of other Rule 280 changes this has been scheduled in the latter part of the implementation window.	1. Define requirements 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 i) 3)	For any former customer, the refund, less unpaid utility service bill amounts, shall be by separate payment issued to the former customer. The refund shall be issued within 30 days after the event that triggers it.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 j) 1) 2) 3)	Records of Deposits:			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.40	DEPOSITS	280.40 k) 1) 2) 3) 4) 5) 6) 7)	Data Collection and Maintenance Requirements: A utility that elects to utilize a credit scoring program for applicants for residential service shall collect and maintain the following data for a period of five years following its collection				N/A

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 a) 1)	A low income customer or applicant may be required to pay a deposit if the following conditions exist: The utility has proof that the applicant or customer benefitted from tampering.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 a) 2)	The applicant was previously disconnected for non-payment of bill amounts owing to the utility for the same class and type of service.			Prior to Dec 31, 2014	In Place
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 b) 1)	With the following exceptions, all provisions of Section 280.40 shall apply equally to low income customers. Credit scoring: A utility shall not assess a low income customer a deposit based upon credit scoring. Credit scoring deposits shall be returned to the customer upon certification as a low income customer.				N/A

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 b) 2)	Late payments and past due over 30 days: A utility shall not assess a low income customer a deposit under Section 280.40(e)(1).	<p>There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65, 280.125)</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 b) 3)	Unpaid final bill: A utility may assess a deposit for a low income applicant if the applicant failed to pay a final bill owing to the utility for the same class and type of service, and that final bill was greater than 20% of the average annual billing for the residential customers of the utility for the calendar year preceding the time of the application.	<p>There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65, 280.125)</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 b) 4)	Payment: A utility may require payment of 1/5 of an applicable deposit within a minimum of 12 days after the issue date of a deposit notice to a low income applicant or customer, with the remaining 4/5 to be paid in equal installments over the next four billing cycles.	There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65, 280.125) Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System.	1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart C: Deposits	Section 280.45	DEPOSITS for LOW INCOME CUSTOMERS	280.45 c)	Deposits collected for any reason other than credit scoring prior to a customer's certification as a low income customer shall remain validly held by the utility until the customer meets the refund conditions found in Section 280.40.			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 a) b) 1) 2) 3)	Billing:, Billing Cycle:			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 1) A) B) C) D) E) F)	Bill Content:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 1) G)	The total amount owing on a payment arrangement, including the installment amounts due and the number of installments remaining to satisfy the arrangement, and that a late payment may result in the termination of the payment arrangement.	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Vendor development - (CIS/Bill print vendor) 3. Test changes 4. Training 5. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 1) H)	The amount of any deposit either held or owing and the accumulated interest on the deposit; and	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Vendor development - (CIS/Bill print vendor) 3. Test changes 4. Training 5. Implement	Q1 2016	Not Started
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 1) I)	Electric and gas utilities shall provide a graphic comparison, such as a bar chart or pie chart, of the current usage and the customer's previous 12 months of historical usage;			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 2) A)	Contact information:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 2) B)	The toll free telephone number for the Commission's Consumer Services Division and a statement indicating that the customer must contact the utility first before seeking assistance from the Commission's Consumer Services Division; and	This requirement can be included(change order) as part of current Liberty Utilities bill presentment project which is scheduled to be implemented Apr 30,2015	1. Requirements 2. Vendor development - (CIS/Bill print vendor) 3. Test changes 4. Implement	Q1 2016	Not Started
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 2) C)	The name and contact information for any supplier or other third parties authorized by the Commission to appear on the bill and with which the customer has contracted;				N/A
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 3) A) B) C) D) E) F) G) H) I)	Meter and rate classification information:			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 4)	Bills not based on metered usage: In the event that a bill is not based on usage derived from meter readings, the bill must indicate the period of time for which the bill is rendered, the type of service rendered, and a complete description of the service or rate classification under which the customer receives service;				N/A
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 5) A) B) C) i) ii) iii) D) i) ii) iii) E)	Itemization of billing amounts:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 5) F) G)	State tax:, Municipal tax:	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Vendor development - (CIS/Bill print vendor) 3. Test changes 4. Training 5. Implement	Q1 2016	Not Started
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 5) H)	Infrastructure maintenance fee;			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 5) I)	Optional services listed separately;			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 6)	The bill due date:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 7)	Definitions or explanations of any abbreviations and technical words used on the bill: and			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 c) 8)	For electric and gas utilities, the average use per day for the period over which the bill is rendered and for the comparable period one year earlier, and an indication of the difference in temperatures between the two periods.	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) - 4. Test changes 5. Training 6. Implement	Q1 2016	Not Started
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 d) 1) 2) 3) 4)	Bill Delivery:			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 e) 1)	Bills for residential customers shall be due a minimum of 21 days after the date they are sent to the customer, and bills for non-residential customers shall be due a minimum of 14 days after the date they are sent to the customer.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 e) 2)	If a bill is mailed from a state or location that does not border Illinois or if payment is received at a state or location that does not border Illinois, the due date shall be:	The items related to section 280.50(due dates) 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to update CIS systems configuration	1. Define requirement/policies 2. Develop/Design CIS configuration and update scripts 3. Update business process/policy documentation 4. Test configuration and update scripts/bill image 5. Train staff 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 e) 2) A)	Residential customer: a minimum of 23 days after the date the bill is sent to the customer; or	<p>The items related to section 280.50(due dates) 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation.</p> <p>Need to train staff</p> <p>Need to update CIS systems configuration</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop/Design CIS configuration and update scripts 3. Update business process/policy documentation 4. Test configuration and update scripts/bill image 5. Train staff 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 e) 2) B)	Residential customer: a minimum of 23 days after the date the bill is sent to the customer; or	The items related to section 280.50(due dates) 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to update CIS systems configuration	1. Define requirement/policies 2. Develop/Design CIS configuration and update scripts 3. Update business process/policy documentation 4. Test configuration and update scripts/bill image 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 e) 3) A) B)	If a bill is mailed from a state or location that does not border Illinois and is also received at a state or location that does not border Illinois, the due date shall be:				N/A

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 f)	Bill Transfers: When a customer has the same class and type of utility service at more than one location with the same utility, the utility shall not transfer a balance owing from one premises account to another until the customer has failed to pay the final bill rendered for that premises or the customer requests that the final balance be transferred directly to the other premises account. When transferring final balances from one premises account to another, the utility shall indicate on the bill the location where the amount due originated.			Prior to Dec 31, 2014	In Place
Subpart D: Regular Billing	Section 280.50	BILLING	280.50 g)	Each utility shall have an example of its bill form in its tariffs on file with the Commission and on its website.	Bill format is changing to meet new section 280 regulations. It is expected that by Q1 2016 all changes will be implemented into production. It is at this time the bill example will be filed with the commission. There is a current version of the bill on Liberty Utilities website. Website will be updated Apr 30 based on current Liberty Utilities bill presentment project. It will subsequently be updated Q1 2016 once rule 280 bill presentment changes have been implemented.	1. Implement Rule 280 bill presentment changes 2. Update website with bill sample	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.60	Payment	280.60 a)	Payment: Intent: This Section describes the methods of payment for utility service; recording of payment receipt; determining lateness of payment; allocation of payment amounts to the customer's account; and limitations on payment methods for accounts on which returned payments have been made.				N/A
Subpart E: Payments	Section 280.60	Payment	280.60 b) 1)	Method of Payment: At a minimum, the utility shall provide detailed information about all methods of payments on the utility's website and in the customer information packet required in this Section.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.60	Payment	280.60 b) 2)	The utility's bill to the customer shall advise the customer how to obtain information on the available payment methods. When contacted by a customer inquiring about making a payment, the utility's customer service personnel shall advise the customer of the available methods of payment, including the most expedient and least cost methods of available payment.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.60	Payment	280.60 b) 3)	When a utility determines that it will no longer accept a specific alternative method of payment, it shall provide advance notice to the affected customers.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.60	Payment	280.60 c) 1)	Payment is late when it has not been received by the utility within two days after the due date on the bill.	<p>The items related to section 280.45 b2 (late fee) and 280.60, 280.65 (waiver late fee) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. The timing is linked to the due date/preferred due dates changes in section 280.50/280.70 to leverage testing efforts as the changes for due date/late fee are interrelated when testing.</p> <p>2 grace days is currently in place. However with the updates to due date per new rules listed above, will also review/test to ensure this continues to be in place.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to update CIS systems/bill print</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop/Design CIS configuration 3. Update business process/policy documentation 4. Test configuration/process and bill image 5. Train staff 6. Implement 	Q1 2016	Not Started
Subpart E: Payments	Section 280.60	Payment	280.60 c) 2)	The date a payment or payment instrument is presented to or arrives at the utility or its agent/vendor is the date of payment receipt.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.60	Payment	280.60 c) 3)	A utility shall not wait until funds are transferred or posted to the utility bank account for purposes of determining payment receipt.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.60	Payment	280.60 d) 1)	Late Fees: If a utility elects to assess late fees, it shall file a tariff describing the late fees.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.60	Payment	280.60 d) 2)	Late fees shall not exceed 1.5% per month assessed towards any undisputed amounts remaining unpaid for more than two days after the due date on a bill.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.60	Payment	280.60 d) 3)	Late fees may be assessed on undisputed overdue budget installment amounts (not the accumulated uncollected budget plan payment balance) owing on a budget payment plan when there is an overall deficit credit balance in an account, as an alternative to termination of participation in the plan for late payment.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.60	Payment	280.60 d) 4)	A utility shall not continue to assess late fees on any final bill that has been outstanding for more than six months.			Prior to Dec 31, 2014	In place
Subpart E: Payments	Section 280.60	Payment	280.60 d) 5)	Late fees shall not be assessed on any amount billed that is not for utility service unless otherwise authorized by statute.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.60	Payment	280.60 d) 6)	Late fees for units of State government shall be assessed according to the State Prompt Payment Act [30 ILCS 540]. No late payment charges shall be assessed on the amounts owing on units of county and local government (including, but not limited to, townships, municipalities and school districts) until 45 days after the date of the issuance of the bill for utility service.	The items related to section 280.45 b2 (late fee) and 280.60, 280.65 (waiver late fee) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. The timing is linked to the due date/preferred due dates changes in section 280.50/280.70 to leverage testing efforts as the changes for due date/late fee are interrelated when testing. Need to develop /update business process/policy and related documentation. Need to train staff Need to update CIS systems/bill print	1. Define requirement/policies 2. Develop/Design CIS configuration 3. Update business process/policy documentation 4. Test configuration/process and bill image 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart E: Payments	Section 280.60	Payment	280.60 e) 1)	Returned Payments: Limiting: A utility shall not limit a customer from paying by any of the available methods acceptable to the utility unless the customer has provided one or more returned payments in the past 12 months, without an explanation from the customer's financial institution that the returned payment was not the customer's fault.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.60	Payment	280.60 e) 2)	Notice: A utility shall notify a customer when it will no longer accept a form of payment from the customer as a result of returned payment.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.65	Late Payment Fee Waiver for Low Income Customers	280.65 a)	Waiver: A low income customer shall not be assessed late payment fees while he or she is qualified as a low income customer.	<p>There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65 and 280.125) in addition this rule will be tied specifically with the other late fee rules being implemented in July 31, 2015.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms Need to record and track in Customer Information System</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Configure/Develop functionality in CIS 3. Update business process/policy documentation 4. Test functionality in CIS 5. Train staff 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.65	Late Payment Fee Waiver for Low Income Customers	280.65 b)	New Qualification: When a customer is qualified as a low income customer, the utility shall not be obliged to waive late fees that were assessed prior to qualification.	The items related to section 280.45 b2 (late fee) and 280.60, 280.65 (waiver late fee) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. The timing is linked to the due date changes in section 280.50 to leverage testing efforts for due dates/late fee changes. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirement/policies 2. Develop/Design CIS configuration 3. Update business process/policy documentation 4. Test configuration 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart E: Payments	Section 280.65	Late Payment Fee Waiver for Low Income Customers	280.65 c)	Expiration of Qualification: If a customer is not re-qualified as a low income customer, then the utility may begin assessing late fees on past due amounts. However, late fees shall not be assessed retroactively on bills issued during the time period when the customer was qualified as a low income customer.	The items related to section 280.45 b2 (late fee) and 280.60, 280.65 (waiver late fee) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. The timing is linked to the due date changes in section 280.50 to leverage testing efforts for due dates/late fee changes. Need to develop /update business process/policy and related documentation. Need to train staff Need to possibly update CIS systems	1. Define requirement/policies 2. Develop/Design CIS configuration 3. Update business process/policy documentation 4. Test configuration 5. Train staff 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.70	Preferred Payment Date	280.70 a)	Intent: An eligible residential customer who is billed monthly and who can demonstrate that his or her primary source of income is derived from a benefit that is received during the 10 day period after the customer's regular due date shall be entitled to a preferred payment date to enable the customer to submit timely payments.	The items related to section 280.50(due dates) and 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart E: Payments	Section 280.70	Preferred Payment Date	280.70 b) 1) 2) 3)	Notification: When a customer pays late two times in a 12 month period, the utility shall notify the customer of the availability of a preferred payment date. The utility shall make a record on the customer's account of the notification, and notification shall be made by any of the following methods: 1) - Message included in the customer's bill; 2) - Separate written communication; or 3) - Verbal communication.	The items related to section 280.50(due dates) and 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to update CIS systems, bill print or IVR	1. Define requirement/policies 2. Develop/Design solution 3. Update business process/policy documentation 4. Test configurationand update scripts/bill image 5. Train staff 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.70	Preferred Payment Date	280.70 c) 1) 2) 3) 4)	<p>Eligibility: Residential customers shall be eligible for a preferred payment date if they are included in any one of the following:</p> <p>1) - Customers receiving Temporary Assistance for Needy Families (TANF) or Aid to the Aged, Blind and Disabled (AABD);</p> <p>2) - Customers receiving benefits from General Assistance or Supplemental Security Income;</p> <p>3) - Customers receiving income from Social Security benefits or Veterans benefits; or</p> <p>4) - Customers receiving unemployment compensation benefits.</p>	<p>The items related to section 280.50(due dates) and 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation.</p> <p>Need to train staff</p>	<p>1. Define requirement/policies</p> <p>2. Update business process/policy documentation</p> <p>3. Train staff</p> <p>4. Implement</p>	Q1 2016	Not Started
Subpart E: Payments	Section 280.70	Preferred Payment Date	280.70 d) 1) 2)	<p>Options:</p> <p>Options: The utility shall inform an eligible customer of the following options from which the customer may choose:</p> <p>1- Enter into a budget payment plan with a preferred payment date that is not more than 10 days after the customer's regular billing date and is agreed upon by the customer and the company; or</p> <p>2- Establish a preferred payment date that shall not be more than 10 days after the customer's regular billing date.</p>	<p>The items related to section 280.50(due dates) and 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation.</p> <p>Need to train staff</p>	<p>1. Define requirement/policies</p> <p>2. Develop/Design CIS configuration</p> <p>3. Update business process/policy documentation</p> <p>4. Test configuration</p> <p>5. Train staff</p> <p>6. Implement</p>	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.70	Preferred Payment Date	280.70 e)	Removal: If the customer fails to pay on or before the preferred payment date more than four times in a 12 month period, the utility may remove the customer's account from the preferred payment date and return the customer to the regular bill due date. After the removal of a customer, the utility shall not be obliged to offer the preferred payment date to that same customer for a period of 12 months.	The items related to section 280.50(due dates) and 280.70 (preferred due date) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirement/policies 2. Develop/Design CIS reports 3. Update business process/policy documentation 4. Test reports 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 a)	Intent: This Section provides a process to equalize payments for utility service, based upon the customer's average bill instead of the actual fluctuating amount for each separate billing period.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 b)	Applicability: The requirements of this Section shall apply to residential customers and small business customers. Nothing shall prevent a utility from offering a budget payment plan to non-residential customers that are not small businesses.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 c) 1)	Eligibility: No past due amount owing: A customer whose account balance is current may enroll in a budget payment plan at any time of the year.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 c) 2)	Past due: In order to establish eligibility for a budget payment plan, a customer owing a past due amount must either pay the entire past due amount or enter into a DPA with the utility to retire the past due debt.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 d)	Offering: The utility shall inform its customers of the availability of its budget payment plan and encourage its use.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 e)	Enrollment: Upon inquiry from the customer, the utility shall calculate and advise the customer what the projected budget payment plan amount will be for the customer's account. If the customer accepts the offer to enroll in budget billing, the utility shall begin the plan for that account.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 f)	Bill Itemization: In addition to the regular billing requirements of Section 280.50, the bill statement for an account enrolled in the budget payment plan shall contain separate line items for:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 f) 1)	The budget payment amount; and			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 f) 2)	The amount of the accrued credit or shortfall			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 g) 1) 2)	Periodic Adjustments:				N/A
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 h) 1) 2)	Reconciliation:				N/A
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 i)	Late Payments: No late payments charge shall be assessed on a budget payment plan unless there is an overall budget deficit balance in an account when the late payment occurs. The late payment charge shall be computed on the late installment only, not on the accumulated budget deficit in the account.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 j)	Transfer of Service: When a customer on a budget payment plan informs the utility that the customer will be transferring service with that utility from the current location to a new location served by the same utility, the utility shall advise the customer what the projected budget payment plan amount will be at the new location and that the customer may choose to either remain on the budget payment plan at the new location or cancel the plan.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 k) 1)	Cancellation: A customer may cancel a budget payment plan at any time.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 k) 2)	A utility may cancel a customer's budget payment plan when the customer either submits a payment that is less than the full budget payment plan amount or the customer's payment is 21 days in arrears. Late fees may be assessed on undisputed budget installment amounts owing on a budget payment plan as an alternative to termination of participation in the plan.			Prior to Dec 31, 2014	In place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 k) 3)	Any shortfall amount owing to the utility at the time of cancellation shall be included and payable as current charges on the next bill statement.			Prior to Dec 31, 2014	In Place
Subpart E: Payments	Section 280.80	Budget Payment Plan	280.80 k) 4)	Any credit amount owing to the customer at the time of cancellation shall appear as a credit on the next bill statement. After the issuance of that bill statement, Section 280.110 shall apply to the credit balance.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 a)	Intent: This Section describes the utility's responsibilities to obtain actual readings of the customer's meter and the process by which a utility may issue an estimated bill to a customer when the utility is unable to obtain an actual reading or a customer reading.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 b) 1)	Utility Meter Reading: A utility shall perform an actual reading of a customer's meter at least every second billing period unless the utility's attempt to do so is prevented.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 b) 2)	A utility shall perform an actual reading of a customer's meter every billing period if that meter is equipped with a remote reading device, unless the utility effort to do so is prevented.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 b) 3)	<p>When the utility's attempt to read the meter fails, it shall record the date, time of day, utility personnel involved, and reason for the failure. The record shall be retained for a period of two years. In addition, its field representative making the visit to read the meter shall leave a door tag at the premises. The door tag shall indicate when the utility representative was there and provide the utility's contact information for the customer to set up an appointment with the utility to gain access to the meter. If the customer's meter is equipped with a remote reading device to obtain a reading without the presence of field personnel on the customer's property, then the utility may mail or use other means to deliver written notification (may include electronic written notification to customers who have elected electronic billing methods) of the failed reading to the customer in lieu of leaving a door hanger. The utility may contact a customer by telephone to provide notice of a failed reading, provided that written notification must be sent if the utility fails to reach the customer directly or successfully leave a voice message.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 b) 4)	A reading provided by a remote reading system or device shall be considered an actual reading.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 b) 5)	A reading provided by a Commission certified meter service provider in compliance with the utility's tariff shall be considered an actual reading.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 b) 6)	If a utility issues two consecutive estimated bills to a customer, the utility shall contact the customer to resolve the reason for the consecutive estimated bills, so that the utility may obtain an actual reading of the meter or a customer reading. If the utility is unable to contact the customer, it shall send a letter advising the customer of the utility's need for contact on the matter. The utility shall make a record of each effort to contact the customer.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 c) 1)	Customer Meter Reading: A customer reading of the meter provided to the utility shall satisfy the actual reading requirement in subsection (b)(1). However, a utility shall not require a customer to provide customer readings when the customer can provide access to the meter for utility personnel.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 c) 2)	After six consecutive months of customer provided readings, a utility shall take an actual reading of the meter in accordance with subsections (b)(1) and (2).			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 d)	Meter Readings for Beginning and Ending Service: Unless a utility has taken an actual reading of the meter within the past 60 days, it shall take an actual reading of the meter as prescribed in this subsection (d). The utility may satisfy the requirements of this subsection (d) on the day before or the day after the beginning or ending date if that date falls upon a non-business day of the utility.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 d) 1)	On the beginning date of service for a new customer, so long as the new customer has provided the utility with at least five days advance notice of the start date, and so long as the customer provides the utility with access to the meter;			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 d) 2)	On the ending date of service for a customer who is stopping service, so long as the customer has provided the utility with at least five days advance notice of the end date, and so long as the customer provides the utility with access to the meter.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 e)	Estimated Bill Formula: A utility's formula for estimating customer meter readings shall be filed in the utility's tariff.	Need to review current documentation for estimation formula and make necessary updates if required.	Document estimation formula	Q1 2016	Not Started
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 f) 1)	Bill Labeling: A bill based upon an estimated reading shall indicate that it is an estimated bill and that the meter reading figure is an estimated reading.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 f) 2)	A bill based upon an actual reading shall indicate that the meter reading figure is an actual reading.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 f) 3)	A bill based upon a customer reading shall indicate that the meter reading figure is a customer reading.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.90	Estimated Bills	280.90 g)	Unless the utility's attempt to access the meter has been prevented, as described in subsection (b)(3), the utility shall not disconnect a customer for non-payment of two or more consecutively estimated bills until the utility takes an actual reading of the meter to verify the accuracy of the billing.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 a)	Intent: This Section provides for the billing and payment of previously unbilled service caused by errors in measuring or calculating a customer's bills.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 b) 1)	Time Limits: Bills for any utility service, including previously unbilled service, supplied to a residential customer shall be issued to the customer within 12 months after the provision of that service to the customer.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 b) 2)	Bills for any utility service, including previously unbilled service, supplied to a non-residential customer shall be issued to the customer within 24 months after the provision of that service to the customer.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 b) 3)	The time limits of subsections (b)(1) and (2) shall not apply to previously unbilled service attributed to tampering, theft of service, fraud or the customer preventing the utility's recorded efforts to obtain an accurate reading of the meter.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 b) 4)	No utility shall intentionally delay billing beyond the normal bill cycle.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 c)	Itemization: Any amount attributed to previously unbilled service shall be labeled as such on the customer's bill and include the beginning and ending dates for the period during which the previously unbilled amount accrued.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 d)	Calculation: For previously unbilled service accrued over a period of time when the rates for service have varied, the utility shall issue the makeup billing amount calculated on a prorated basis to reflect the varying rates.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 e) 1)	Payment: If a utility issues a makeup bill for previously unbilled service, it shall offer the customer a special payment arrangement to retire the amount by periodic payments, without interest or late fees, over a time equal to the amount of time for the delay in billing.			Prior to Dec 31, 2014	In Place
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 e) 2)	The special payment arrangement does not exhaust a customer's right to a DPA or medical payment arrangement (MPA), provided however, that neither the special payment arrangement nor the DPA nor the MPA may be used simultaneously unless it is agreed to by both the utility and the customer.	The items related to payment arrangements in section 280.100, 280.120, 280.160 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart F: Irregular Billing	Section 280.100	Previously Unbilled Service	280.100 e) 3)	Late fees may be assessed on any installment amount on the special payment arrangement that is unpaid after two days beyond the due date on the bill containing that installment.			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 a)	Intent: This Section describes the procedures for customers to receive credits and refunds for overpayments and overcharges for utility service.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 b)	Billing Time Period for Refunds and Credits Due to Overcharges Resulting from Utility Error:			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 b) 1)	A utility shall issue a refund or credit to a customer's account for the full period of time during which an overcharge occurred, so long as either the utility or the customer has retained billing records that would allow determining a refund or credit.			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 b) 2)	A utility shall retain billing records and ledgers that would allow determining a refund or credit for a minimum of two years from the current date.			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 b) 3)	A utility shall not be obliged to issue to a customer a refund or credit that extends into a time period during which that customer was not the customer of record. Exceptions may be made when the utility issues a refund or credit as a result of a Commission order.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 c) 1)	Overpayment without Utility Error: If the overpayment is the result of the customer paying more than the amount due on the bill, then the overpayment shall be noted on the customer's next bill statement, itemized to indicate the credit balance.			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 c) 2)	If the customer requests that the money overpaid be refunded to him/her, then the utility shall be obliged to do so as long as the overpayment credit amount exceeds 25% of the customer's average monthly bill. The refund shall be made within 10 business days after the utility confirms that it has received the money involved with the overpayment.	The items related to section 280.110 (Refunds and Credits) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 c) 3)	This subsection (c) shall not apply to any overpayment that results from payment on the customer's account by a State or federal assistance agency. Any such overpayment or credit on the customer's account shall be handled in the manner specified by the State or federal agency.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 d)	Interest on Refunds and Credits: All refunds and credits due to utility billing error shall be accompanied with interest calculated at the rates set by the Commission for customer deposits (see Section 280.40(g)). Interest shall accumulate starting 30 days after the date the actual money comprising the overpayment is received by the utility until the date the utility issues a refund or credit to the customer's account. Credit balances accumulated on active budget payment plans shall not be subject to interest under this subsection unless the budget payment plan is cancelled while a credit balance remains. Interest shall accumulate from the date of the budget payment plan cancellation until the credit is refunded or consumed by future billing.	The items related to section 280.110 (Refunds and Credits) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.	<ol style="list-style-type: none"> 1. Define requirement/policies - May 2015 2. Update business process/policy documentation - Jun 2015 3. Update CIS configuration and test - Jun 2015 4. Train staff - Jul 2015 5. Implement - Jul 2015 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 e)	Itemization of Overcharges: All credits and refunds resulting from overcharges shall be accompanied by an itemization describing the reason for the credit or refund to the customer.	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement	Q1 2016	Not Started
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 f) 1)	Credit to Bill Statement or Direct Refund to Customer: Regular billing: For active service or transfer of service accounts, the utility shall either issue a credit to the account or, if the customer requests it at any time, make a direct refund to the customer so long as the credit balance exceeds 25% of the customer's average monthly bill.	The items related to section 280.110 (Refunds and Credits) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.	1. Define requirement/policies - May 2015 2. Update business process/policy documentation - Jun 2015 3. Train staff - Jul 2015 4. Implement - Jul 2015	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 f) 2)	Final bills: When the credit amount exceeds the total amount due on a customer's final bill, the utility shall issue a direct refund to the customer.			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 f) 3)	Exemptions from refunds: A utility shall not be obliged to issue a refund to a customer for a credit balance accrued as the result of Commission approved billing programs or rates that specifically disallow the issuance of refunds, or when the customer owes the utility a past due amount for the same class and type of service at another location.			Prior to Dec 31, 2014	In Place
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 g) 1)	Time Limit to File Complaint: Excessive or unjust charges: All complaints for the recovery of damages shall be filed with the Commission within 2 years from the time the produce, commodity or service as to which complaint is made was furnished or performed. [220 ILCS 5/9-252]			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart G: Refunds and Credits	Section 280.110	Refunds and Credits	280.110 g)2)	Refunds for overcharges: When a customer pays a bill as submitted by a public utility and the billing is later found to be incorrect due to an error either in charging more than the published rate or in measuring the quantity or volume of service provided, the utility shall refund the overcharge with interest from the date of overpayment at the legal rate or at a rate prescribed by the Commission (see Section 280.40(g)). Refunds and interest for such overcharges may be paid by the utility without the need for a hearing and order of the Commission. Any complaint relating to an incorrect billing must be filed with the Commission no more than 2 years after the date the customer first has knowledge of the incorrect billing. [220 ILCS 5/9-252.1]	The items related to section 280.110 (Refunds and Credits) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.	1. Define requirement/policies - May 2015 2. Update business process/policy documentation - Jun 2015 3. Develop report - Jun 2015 4. Train staff - Jul 2015 5. Implement - Jul 2015	Q1 2016	Not Started
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 a)	Deferred Payment Arrangements: Intent: Payment arrangements shall be structured and administered to maximize the successful retirement of past due utility service amounts owing to the utility while allowing the customer to retain active utility service.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 b) 1)	Mandatory offering by the utility: A residential customer owing a past due amount for utility service shall be eligible for a deferred payment arrangement so long as the customer has not failed to complete a previous DPA in the past 12 months.			Prior to Dec 31, 2014	In place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 b) 1) A)	At any time a customer's account balance owing is brought to current status, the utility shall consider all previous DPAs completed.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 b) 1) B)	A customer who is eligible for a DPA under this subsection (b) shall remain fully eligible until utility service is disconnected.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 b) 2) A)	At the utility's discretion, an applicant owing a past due amount for utility service may enter a DPA to retire the debt.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 b) 2) B)	At the utility's discretion, a non-residential customer owing a past due amount for utility service may enter a DPA to retire the debt.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 b) 2) C)	At the utility's discretion, a residential customer owing a past due amount for service, but who is not automatically eligible for a DPA under subsection (b)(1), may enter into a DPA to retire the debt.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 c)	Amounts Included in DPA: The DPA shall only include amounts owing for utility service for which the utility would otherwise be entitled to disconnect the customer's service after proper notice if the customer was not on the DPA. DPA default shall not occur as a result of failure to pay non-utility service charges.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 d)	Transfer: When a customer transfers service, an existing DPA established at the old premises shall transfer with the customer to the new premises. A utility may be allowed to start an entirely new DPA at the new premises to accommodate its billing systems programming so long as the "new" DPA is identical to the previous DPA.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 e) 1)	Bill Itemization: Each bill rendered to a customer who has established a DPA with the utility and has not defaulted shall include the following information:				N/A

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 e) 1) A)	The total balance remaining on the DPA;	This requirement can be included(change order) as part of current Liberty Utilities bill presentment project which is scheduled to be implemented Apr 30,2015	1. Requirements - Completed Dec 2014 2. Vendor development - (CIS/Bill print vendor) - Jan/Feb 2015 3. Test changes - March/Apr 2015 4. Implement - Apr 30,2015	30-Apr-15	In Progress
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 e) 1) B)	The amount of the installment;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 e) 1) C)	The number of remaining installments on the DPA; and	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Vendor development - (CIS/Bill print vendor) 3. Test changes 4. Training 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 e) 1) D) i), ii)	A statement explaining that: a late or partial payment may result in the cancellation of the DPA, causing the total deferred amount and current charges to become immediately due in full; ii)and non-payment of the full amount due may result in disconnection	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Vendor development - (CIS/Bill print vendor) 3. Test changes 4. Training 5. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 e) 2) A)	<p>If a DPA defaults and is not reinstated prior to the next bill statement, the utility shall notify the customer of the default by at least one of the following methods: A message on the next bill statement stating the amount required to reinstate the DPA if paid in full by a specific date and that a later payment may result in additional charges or the cancellation of the DPA ; or</p> <p>B) - A separate written notice stating the amount required to reinstate the DPA if paid in full by a certain date and that a later payment may result in additional charges or the cancellation of the DPA; or</p> <p>c) -A live phone call to the customer. The utility shall make a record of the date, time of day and utility personnel involved in the phone call, and retain the record for two years. If the utility is unable to speak with the customer directly, it shall provide either a message on the next bill statement or separate written notice of default in accordance with subsection (e)(2)(A) or (B).</p>	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 f) 1)	<p>Down Payment:In order to initiate a DPA, the customer must pay a minimum of 25% of the past due amount for utility service.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 f) 2)	By agreement with the customer, the utility may include current billing amounts with the past due amount as the total balance from which the 25% down payment may be calculated.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 f) 3)	At the utility's discretion, the down payment amount may be decreased.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 g) 1)	Length of DPA: The amount of time negotiated with the customer for the completion of the DPA shall be set between 4 to 12 billing cycles, with the utility having the discretion to agree to more than 12 billing cycles for completion of the DPA.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 g) 2)	In determining the length of time to offer, the utility shall take into account the ability of the customer to successfully complete the DPA.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 g) 3)	If a residential customer's household income will not allow the customer to successfully complete a DPA of any length, the utility shall advise the customer of the availability of local assisting agencies.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 h) 1)	Installments: The installments shall be equal amounts, unless unequal amounts are established by agreement with the customer.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 h) 2)	The installments shall be due at the same time as the regular bill due dates.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 i) 1)	A utility may consider a DPA in default when a customer fails to pay the full amount of the installment and the current bill by the second day after the bill due date.	<p>The items related to payment arrangements in section 280.100, 280.120 and 280.160 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. However this item will require a modification to CIS and will be implemented in the next upgrade ETA Q3 2015.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff</p>	<ol style="list-style-type: none"> 1. Define requirement/policies - Jan 2015(as this will involve a CIS modification, need to review earlier in the process) 2. Vendor Design/Develop modification to CIS 3. Update business process/policy documentation 4. Test CIS 5. Train staff 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 i) 2)	The utility may resume collection activity after a DPA defaults, including delivery of a disconnection notice and subsequent disconnection of the service unless the customer pays the full amount past due or pays the reinstatement amount and any applicable reinstatement fee in order to resume the DPA.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 j) 1)	A utility is not obliged to reinstate a defaulted DPA once it has disconnected service to the customer for nonpayment.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 j) 2)	A customer may reinstate a previously defaulted DPA by paying the required amount of the DPA installments owing up to that date, including all past due bills that were not included in the original DPA amount. The default notice shall state that DPA reinstatement is possible for a stated amount if paid in full by a certain date and that reinstatement subsequent to that date may include additional charges.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 j) 3)	The utility shall not assess a reinstatement fee for the first reinstatement of a defaulted DPA.				N/A

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 j) 4)	For each subsequent default after the first, in addition to paying the amounts required under subsection (j)(2), the customer shall pay a reinstatement fee if the utility has filed a tariff establishing a reinstatement fee.				N/A
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 1)	Renegotiation: A customer whose financial conditions change during the course of a DPA shall be allowed to renegotiate the length of the DPA with the utility to ensure its successful completion.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 2)	One renegotiation is allowed during the course of a DPA, so long as:			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 2) A)	The customer is willing to discuss the customer's financial circumstances;			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 2) B)	The customer has at least made the down payment on the original DPA; and			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 2) C)	The DPA is not currently in default status.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 3)	Through renegotiation, the utility shall not be obliged to extend the term of the DPA any longer than 4 to 12 additional billing cycles beyond the original term of the DPA; provided, however, that the utility and customer may renegotiate the DPA for a longer term if both parties agree.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 k) 4)	Renegotiation does not preclude a customer's right to reinstate a defaulted DPA prior to disconnection.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 l)	Overlapping Arrangements: Multiple arrangements of any type under this Section shall not be employed simultaneously without the consent of both the utility and the customer. However, the utility shall not maintain an otherwise defaulted arrangement to prevent a customer from using another type of payment arrangement for which the customer is eligible.	The items related to payment arrangements in section 280.100, 280.120 and 280.160 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.120	Deferred Payment Arrangements	280.120 m)	Eligibility for Winter DPA: A customer's right to establish a winter DPA under Section 280.135 shall be unaffected by any default on a DPA under this Section.	<p>The items related to payment arrangements in section 280.100, 280.120 and 280.160 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.125	Deferred Payment Arrangements for Low Income Customers	280.125 a)	Deferred Payment Arrangements for Low Income Customers: Intent: To enable low income customers to better retain essential utility services, a low income customer shall be eligible for all the provisions described in Section 280.120 from April 1 through November 30. In addition, a low income customer shall be entitled to the altered provisions described in this Section.	<p>There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65 and 280.125).</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.125	Deferred Payment Arrangements for Low Income Customers	280.125 b) 1)	<p>Down Payment: In order to initiate a DPA, a utility may require a maximum down payment of 20% towards the past due amounts for utility service.</p> <p>By agreement with the customer, the utility may include current billing amounts with the past due amount as the total balance from which the 20% down payment may be calculated.</p>	<p>There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65 and 280.125).</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System.</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.125	Deferred Payment Arrangements for Low Income Customers	280.125 c) 1)	Length of DPA Term: The amount of time offered to a low income customer for the completion of a DPA shall be set by the utility at 6 to 12 billing cycles.	There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65 and 280.125). Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System.	1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart H: Deferred Payment Arrangements	Section 280.125	Deferred Payment Arrangements for Low Income Customers	280.125 c) 2)	At its discretion, the utility may set the term for a period longer than 12 months.			Prior to Dec 31, 2014	In Place
Subpart H: Deferred Payment Arrangements	Section 280.125	Deferred Payment Arrangements for Low Income Customers	280.125 d)	Reinstatement Fee Waiver: A utility shall not assess a reinstatement fee for any reinstatement of a DPA by a low income customer.				N/A

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart H: Deferred Payment Arrangements	Section 280.125	Deferred Payment Arrangements for Low Income Customers	280.125 e) 1)	<p>Amended DPA: A utility shall offer an amended DPA to a low income customer who is in default on a first DPA if the customer has made at least two consecutive full payments under the first DPA and the customer has not been in default on the first DPA for more than 90 days.</p> <p>2) The amended DPA shall be for the same term or longer than the term of the first DPA.</p> <p>3) As a condition of entering the amended DPA, the utility <i>may</i> require the customer to participate in the payment option described in Section 280.80.</p>	<p>There are several rules through various subparts of rule 280 related to low income which are not currently in place. These are being grouped into a 'sub-project' to ensure a holistic process is developed. (This includes (280.20, 280.45, 280.65 and 280.125).</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to record and track in Customer Information System.</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 a)	Disconnection of Service: Intent: The purpose of this Section is to provide adequate notice and reason for disconnection; allow for the customer to remedy the problem and avoid disconnection; create an expectation to act upon notice by a utility when a customer does not remedy the problem; and set prohibitions and limits on disconnection under certain circumstances.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 1)	Allowable reasons for disconnection: Non-payment of past due bill for the same class and type of utility service;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 2)	Non-payment of valid utility service deposit owing on account;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 3)	Non-payment of a deposit owing as result of utility evidence of a problem described in Section 280.210;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 4)	Failure to provide access in multi-meter premises to utility facilities after attempts by the utility to gain access as described in Section 280.140;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 5)	Failure to provide access to utility facilities after four attempts (two attempts if in order to meet regulatory requirements) by the utility to gain access to a single customer premises, provided that the utility must comply with the same notification and record keeping requirements as in Section 280.140 (c)(1), (2) and (3);			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 6)	Occupant usage without a valid customer of record;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 7)	Theft of service and/or tampering;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 8)	Non-compliance with any rules of the utility on file with the Commission for which the utility is authorized by tariff to disconnect service in the event of non-compliance;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 9)	Non-compliance with an order of the Commission;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 10)	Unsafe conditions; or			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 b) 11)	Cooperation with civil authorities.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 c) 1)	Non-deniable Charges: The following shall not constitute valid reasons for disconnection of regulated utility services: Charges for non-utility services, unless otherwise authorized by Illinois statute;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 c) 2)	Charges for another class (residential or non-residential) of utility service;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 c) 3)	Charges for another type (gas, electric, water or sewer, unless water and sewer utility service are provided by the same utility) of utility service;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 c) 4)	Charges for equipment or merchandise unless otherwise authorized by statute; or			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 c) 5)	Charges currently in dispute under Section 280.220 or Section 280.230.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 1)	Disconnection Notice Content: Utility disconnection notices shall conform with Appendices A, B and D and shall include at least: Date issued;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 2)	Effective date;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 3)	Reason for disconnection;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 4)	Options for the customer to prevent disconnection;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 5)	Contact information for the utility;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 6)	Contact information for the Commission's Consumer Services Division; and	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new forms.</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirement 2. Vendor updates 3. Test Disconnect Notice 4. Training 5. Implement 	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 d) 7)	Medical certification process and customer bill of rights in Appendix B.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 e) 1)	Method of Disconnection Notice Delivery: All utility disconnection notices shall be sent separately from any other mailing to the customer.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 e) 2)	The notice shall be sent by U.S. Mail or hand delivered.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 e) 3)	The utility shall record the date the notice is sent or delivered and retain that record for two years.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 e) 4)	If the utility and customer have agreed to electronic communications, a utility shall submit a duplicate notice to the customer electronically as long as it has also mailed or hand delivered a paper version of the notice to the customer.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 f)	Third Party Notice: A customer may designate, by written request to the utility, that a third party will be sent or delivered a duplicate notice whenever a disconnection notice is sent or delivered to the customer. The utility will send or deliver any third party notice at the same time as the notice is sent or delivered to the customer.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 g) 1)	Timing of Notice: When notice shall be sent: A utility shall not send or deliver a disconnection notice until after one of the reasons described in subsection (b) occurs.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 g) 2)	Effective date: The utility shall not disconnect service until at least 10 days after the sending or delivery of the notice to the customer.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 g) 3)	Duration of notice: The notice shall remain effective for 45 days after it is sent or delivered.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 g) 4)	Overlapping notices: A utility may send or deliver a new notice prior to the expiration of a previous notice. The customer shall be entitled to the remedies offered in the previous notice until the effective date of the new notice.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 g) 5)	The customer's regular monthly bill shall not be considered a new disconnection notice or operate to extend the due date of a previously issued disconnection notice.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h)	Exemptions to Notice Requirements: Disconnection notices substantially in the form of Appendix A shall be required prior to all disconnections of service, except in cases of:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h) 1)	Occupant usage without a customer of record, provided that the utility shall refer to subsection (i) for special provisions related to occupant usage;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h) 2)	Theft of service and/or tampering;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h) 3)	Unsafe conditions;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h) 4)	Cooperation with civil authorities;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h) 5)	Cooperation with civil authorities;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 h) 6)	The current customer has requested the service be disconnected.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 i)	Warning Letter Required Instead of Appendix A (Disconnection Notice for Occupant Usage without Valid Customer):	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new letters</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop warning letter/review and update existing reports for identification of scenario - 3. Update business process/policy documentation 4. Test reports 5. Train staff 6. Implement - rollout /reports to production 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 i) 1)	When the utility has left the service on at a premises and there is usage without a customer of record, it shall send or deliver a warning letter to the premises address, containing the utility's toll free contact information, advising that an applicant must contact the utility to become a new customer or the service will have to be disconnected after 10 days.	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new letters</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop warning letter/review and update existing reports for identification of scenario 3. Update business process/policy documentation 4. Test reports 5. Train staff 6. Implement - rollout /reports to production 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 i) 2)	If the utility has contact information for the landlord or property manager of the premises, a duplicate warning letter shall be sent or delivered to that person at the same time as the warning letter to the premises.	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new letters</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop warning letter/review and update existing reports for identification of scenario 3. Update business process/policy documentation 4. Test reports 5. Train staff 6. Implement - rollout /reports to production 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 i) 3)	If there is no response within 10 days after the sending of the warning letter, the utility shall have the right to disconnect the service.	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new letters</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop warning letter/review and update existing reports for identification of scenario 3. Update business process/policy documentation 4. Test reports 5. Train staff 6. Implement - rollout /reports to production 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 i) 4)	The utility shall not be obliged to send a warning letter to a premises when it disconnects service within 10 days after the date that the current customer requests as the date the utility will shut off and end that customer's service.	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new letters</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Update business process/policy documentation 3. Train staff 4. Implement 	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 j) 1)	Warning Call to Residential and Master-metered Customers: Unless the customer has no phone number on record, the utility shall provide a warning call to the customer a minimum of 48 hours prior to the scheduled disconnection.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 j) 2)	The warning call may be live or automated, and it shall advise the customer of the utility's intent to disconnect the service. A second call shall be required 24 hours prior to the schedule disconnection if the first call does not reach a person or an answering machine.	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed</p> <p>Requires system changes - reporting to be built and tested. Multiple vendors will need to be engaged.</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop reports/call messaging 3. Test 4. Update business process/policy documentation 5. Train staff 6. Implement - rollout /CIS report/IVR outbound updates to production 	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 j) 3)	The warning call shall provide the customer with the toll free or local phone numbers that the customer may use to contact the utility to discuss the situation.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 j) 4)	The utility shall make a record of the date and time of day of, and its success or failure in reaching the customer through, the warning call. It shall retain the record for two years.	<p>The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed</p> <p>Requires system changes - reporting to be built and tested. Multiple vendors will need to be engaged.</p> <p>The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.</p>	<ol style="list-style-type: none"> 1. Define requirements 2. Develop reports/call messaging 3. Test 4. Update business process/policy documentation 5. Train staff 6. Implement - rollout /CIS report/IVR outbound updates to production 	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 k) 1)	Obligation to act: When a utility has sent or hand delivered four consecutive disconnection notices to the same customer for the same unremedied reason for disconnection under subsection (b), it shall not send a fifth notice of disconnection for the same unremedied reason unless its effort to disconnect the service has failed. Such failure shall include any temporary moratoriums that would prevent the utility from attempting to disconnect service during the effective period of the disconnection notice.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 k) 2)	Obligation to Act: If the utility's effort to disconnect the service fails, the utility shall record the date, time of day, utility personnel involved and a description of the reason for the failure. It shall retain this record for two years.	The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed Requires reporting to be built and tested. The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Develop reports 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 l)	Time of Day and Day of the Week Prohibitions and Limits: Except for matters of safety, emergency maintenance and cooperation with civil authorities, a utility shall comply with the following prohibitions and limits upon disconnection:				N/A
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 l) 1)	Non-business hours prohibition: A utility shall not disconnect a customer within one hour before or at any time during which it does not have its customer service personnel available to handle the customer's contact.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 l) 2)	Weekday afternoon limits: A utility shall not disconnect a customer after 4:00 PM on Monday through Thursday unless the utility is prepared to take the customer's payment and reconnect the customer that same day if the customer remedies the reason for the disconnection.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 l) 3)	Friday limits: A utility shall not disconnect a residential customer after noon on Friday or a non-residential customer after 4:00 PM on Friday, unless it is prepared to take the customer's payment and reconnect the customer that same day if the customer remedies the reason for the disconnection.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 l) 4)	Weekend limits: A utility shall not disconnect a customer on Saturday or Sunday unless it is prepared to take the customer's payment and reconnect the customer that same day if the customer remedies the reason for the disconnection.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 l) 5)	Time of Day and Day of the Week Prohibitions and Limits: Holiday limits: A utility shall not disconnect a customer on a State of Illinois or utility holiday, or after noon on any day preceding a State of Illinois or utility holiday, unless the utility is prepared to take the customer's payment and reconnect the customer that same day if the customer remedies the reason for the disconnection.	The items related to section 280.130 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Update business process/policy documentation 3. Update CIS configuration 4. Test Configuration 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 m)	Medical Certification: A utility shall not disconnect service to a residence for 60 days upon receipt of a valid medical certificate for a resident of the household, so long as the account is eligible for medical certification under Section 280.160.	The items related to section 280.130 m, 280.160 (Medical Payment Arrangements) which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes	1. Define requirements 2. Update business process/policy documentation/Design CIS configuration 3. Test business process with CIS 4. Train staff 5. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 n) 1)	Temperature Prohibitions: Cold weather: Termination of gas and electric utility service to all residential users, including all tenants of apartment buildings where gas or electricity is used as the only source of space heating or to control or operate the only space heating equipment, is prohibited:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 n) 1) A)	On any day when the National Weather Service forecast for the following 24 hours covering the area of the utility in which the residence or master-metered apartment building is located includes a forecast that the temperature will be 32 degrees Fahrenheit or below; or			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 n) 1) B)	On any day preceding a holiday or weekend when the National Weather Service forecast covering the area of the utility in which the residence or master-metered apartment building is located includes a forecast that the temperature will be 32 degrees Fahrenheit or below at any time during the holiday or weekend. [220 ILCS 5/8-205(a)]			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 n) 2)	Hot weather: If gas or electricity is used as the only source of space cooling or to control or operate the only space cooling equipment at a residence or master-metered apartment building, then a utility with over 100,000 residential customers may not terminate gas or electric utility service to the residential user, including all tenants of master-metered apartment buildings:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 n) 2) A)	On any day when the National Weather Service forecast for the following 24 hours covering the area of the utility in which the residence or master-metered apartment building is located includes a forecast that the temperature will be 95 degrees Fahrenheit or above; or			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 n) 2) B)	On any day preceding a holiday or weekend when the National Weather Service forecast covering the area of the utility in which the residence or master-metered apartment building is located includes a forecast that the temperature will be 95 degrees Fahrenheit or above at any time during the holiday or weekend. [220 ILCS 5/8-205(b)]			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 o)	Energy Act of 1989 Participants (Low Income Customers) Winter Disconnection Prohibition: Notwithstanding any other provision of this Part, no electric or gas public utility shall disconnect service to any residential customer who is a participant under Section 6 of the Energy Assistance Act of 1989 [305 ILCS 20/6] for nonpayment of a bill or deposit where gas or electricity is used to control or operate the primary source of space heating equipment at the premises during the period of time from December 1 and including March 31 of the immediately succeeding calendar year. [220 ILCS 5/8-206(k)]			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 p)	Electric Space-Heating Customer Winter Disconnection Prohibition: A utility that served more than 100,000 electric customers in Illinois as of December 31, 2005 shall not terminate electric service to a residential space heating customer for non-payment from December 1 through March 31. [220 ILCS 5/16-111.6]				N/A
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 q)	Military Personnel on Active Duty Disconnection Prohibition: No utility shall for nonpayment stop gas or electricity from entering the residential premises that was the primary residence of a service member immediately before the service member was assigned to military service. [220 ILCS 5/8-201.5(b)]			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.130	Disconnection of Service	280.130 r)	Service Member or Veteran Disconnection Prohibition: No electric or gas public utility shall disconnect service to any residential customer who has notified the utility that he or she is a service member or veteran for nonpayment of a bill or deposit where gas or electricity is used as the primary source of space heating or is used to control or operate the primary source of space heating equipment at the premises during the period of time from December 1 through and including March 31 of the immediately succeeding calendar year. [220 ILCS 5/8-206(l)]			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 31	280.135 a)	Winter Disconnection of Residential Heating Services, December 1 through March 31: Notwithstanding any other provision of this Part, no electric or gas public utility shall disconnect service to any residential customer or master-metered apartment building for nonpayment of a bill or deposit where gas or electricity is used as the primary source of space heating equipment at the premises during the period of time from December 1 through and including March 31 of the immediately succeeding calendar year, unless:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 32	280.135 a) 1) A)	The utility: Has offered the customer a winter deferred payment arrangement (winter DPA) allowing for payment of past due amounts over a period of not less than four months not to extend beyond the following November and the option to enter into a budget payment plan for the payment of future bills. The maximum down payment requirements shall not exceed 10 percent of the amount past due and owing at the time of entering into the agreement; and			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 33	280.135 a) 1) B)	provides the customer with the names, addresses and telephone numbers of governmental and private agencies which may provide assistance to customers of public utilities in paying their utility bills; the utility must obtain the approval of an agency before placing the name of that agency on any list used to provide the information to customers;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 34	280.135 a) 2)	The customer has refused or failed to enter into a winter DPA as described in subsection (a)(1)(A); and			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 35	280.135 a) 3)	All disconnection notice requirements as provided by law and this Part have been met by the utility.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 36	280.135 b)	Prior to termination of service for any residential customer or master-metered apartment building during the period from December 1 through and including March 31 of the immediately succeeding calendar year, all electric and gas public utilities shall, in addition to all other notices:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 37	280.135 b) 1)	Notify the customer or an adult (a person over the age of 18) residing at the customer's premises either by telephone, a personal visit to the customer's premises or by first class mail, informing the customer that:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 38	280.135 b) 1) A)	The customer's account is in arrears and the customer's service is subject to disconnection for nonpayment of a bill;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 39	280.135 b) 1) B)	The customer can avoid disconnection of service by entering into a deferred payment agreement to pay past due amounts over a period not to extend beyond the following November and the customer has the option to enter into a budget payment plan for the payment of future bills; and			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 40	280.135 b) 1) C)	The customer may apply for any available assistance to aid in the payment of utility bills from any governmental or private agencies from the list of the agencies provided to the customer by the utility.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 41	280.135 b) 2)	A public utility shall be required to make only one contact required in subsection (b)(1) with the customer during any period from December 1 through and including March 31 of the immediately succeeding calendar year.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 42	280.135 b) 3)	Each public utility shall maintain records which shall include, but not necessarily be limited to, the manner by which the customer was notified and the time, date and manner by which any prior unsuccessful efforts to contact the customer were made. These records shall also describe the terms of the DPA offered to the customer and those entered into by the utility and the customer. These records shall indicate the total amount past due, the down payment, the amount remaining to be paid and the number of months allowed to pay the outstanding balance. No public utility shall be required to retain records pertaining to unsuccessful efforts to contact or DPAs rejected by the customer after the customer has entered into a DPA with the utility.	The items related to section 280.130/280.135 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Update business process/policy documentation 3. Test Reports 4. Train staff 5. Implement - rollout tracking and report process	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 43	280.135 c)	No public utility shall disconnect service for nonpayment of a bill until the lapse of six business days after making the notification required in subsection (b)(1) so as to allow the customer an opportunity to:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 44	280.135 c) 1)	Enter into a DPA and the option to enter into a budget payment plan for the payment of future bills; and			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 45	280.135 c) 2)	Contact a governmental or private agency that may provide assistance to customers for the payment of public utility bills.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 46	280.135 d)	Any residential customer who enters into a DPA pursuant to this Section and subsequently, during that period of time set forth in subsection (a), becomes subject to disconnection, shall be given notice as required by law and this Part prior to disconnection of service.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 47	280.135 e)	During that time period set forth in subsection (a), a utility shall not require a down payment for a deposit from a residential customer, pursuant to Section 280.40, in excess of 20% of the total deposit requested. An additional four months shall be allowed to pay the remainder of the deposit. This provision shall not apply to master-metered apartment buildings or other non-residential customers.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 48	280.135 f)	During that period of time set forth in subsection (a), the provisions of Section 280.120 that allow a utility to refuse to offer a DPA to a residential customer who has defaulted on an agreement within the past 12 months are suspended. However, no utility shall be required to enter into more than one DPA under this Part with any residential customer or master-metered apartment building during the period from December 1 through and including March 31 of the immediately succeeding calendar year.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 49	280.135 g)	In order to enable customers to take advantage of energy assistance programs, customers who can demonstrate that their applications for a local, State or federal energy assistance program have been approved may request that the amount they will be entitled to receive as a regular energy assistance payment be deducted and set aside from the amount past due on which they make DPAs. Payment on the set-aside amount will be credited when the energy assistance voucher or check is received, according to the utility's common business practice.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 50	280.135 h)	In no event shall any utility send a disconnection notice to any customer who has entered into a current DPA and has not defaulted on that DPA, unless the disconnection notice pertains to a deposit request.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 51	280.135 i)	Each utility will include with each disconnection notice sent during the period from December 1 through and including March 31 of the immediately succeeding calendar year to a residential customer an insert explaining the provisions of this Section and providing a telephone number of the utility company the customer may call to receive further information.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 52	280.135 j) 1)	Filing with the Commission: Each utility shall file with the Commission prior to December 1 of each year a plan detailing the implementation of this Section. This plan shall contain, but not be limited to:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 53	280.135 j) 1) A)	A description of the methods to be used to notify residential customers as defined in this Part, including the forms of written and oral notices which shall be required to include all the information contained in subsection (b);			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 54	280.135 j) 1) B)	A listing of the names, addresses and telephone numbers of governmental and private agencies which may provide assistance to residential customers in paying their utility bills;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 55	280.135 j) 1) C)	The program of employee education and information which shall be used by the company in the implementation of this Section; and			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 56	280.135 j) 1) D)	A description of methods to be utilized to inform residential customers of those governmental and private agencies and current and planned methods of cooperation with those agencies to identify the customers who qualify for assistance in paying their utility bills.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 57	280.135 j) 2)	A utility that has a plan on file with the Commission need not resubmit a new plan each year. However, any alteration of the plan on file must be submitted prior to December 1 of any year.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.135	Winter Disconnection of Residential Heating Services, December 1 through March 58	280.135 j) 3)	All plans are subject to review and approval by the Commission, which may direct a utility to alter its plan to comply with this Part. [220 ILCS 5/8-206]			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 a)	Disconnection for Lack of Access to Multi-meter Premises: Intent: This Section provides adequate notice and reason for disconnection of an entire multi-meter premises when a utility is unable to gain access to its facilities; allows for the property owner/manager and customers of the premises to remedy the problem and thereby avoid disconnection; and sets prohibitions and limits on this form of disconnection.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 b) 1)	Allowable Reasons for Disconnection of an Entire Multi-Meter Premises: The customers and property owner/manager have failed two consecutive times to provide access to utility facilities in order to meet regulatory requirements, including, but not limited to, inside safety inspections and meter exchanges;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 b) 2)	The customers and property owner/manager have failed three consecutive times to provide access to utility facilities for non-payment disconnections; or			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 b) 3)	The customers and property owner/manager have failed four consecutive times to provide access to utility facilities for meter readings.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 c) 1)	Utility Actions Required prior to Disconnection of an Entire Multi-Meter Premises: The utility must attempt to obtain contact information for the property owner/manager, independently or with the assistance of the affected customers			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 c) 2)	The utility must seek access by physical visit. For each failure to gain access, the utility must record the date, time of day, utility personnel involved, a detailed description of utility's efforts to gain access and the reason for each failure to gain access. The utility shall retain the records for two years;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 c) 3)	For each effort to gain access, the utility must send or deliver warning letters to each affected customer and property owner/manager with at least 10 days advance notice of the utility's intent to gain access and the need for the customer to contact the utility to set up an appointment to provide access;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 c) 4)	After the final consecutive failure to provide access, according to the number of consecutive failures required in subsection (b), the utility must send or deliver a disconnection notice to each affected customer and the property owner/manager as required by Section 280.130;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 c) 5)	At the same time the utility sends or delivers the notices required in subsection (c)(3), it must also post the building with a written notice of disconnection; and			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 c) 6)	If the utility seeks access to disconnect non-paying customers, the utility must send or deliver a disconnection notice for non-payment to the customers in the premises that it intends to disconnect for non-payment.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 d) 1)	Inconvenience Compensation Credit: An inconvenience compensation credit shall be issued by the utility to the accounts of customers who are not otherwise eligible for non-payment disconnection when those customers are disconnected as a result of the utility's disconnection of non-paying customers in the same premises. The inconvenience compensation credit shall be four times the monthly "customer charge" or \$60, whichever is greater.	The items related to section 280.140/280.150/280.130/280.135 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Define new configuration 3. Update business process/policy documentation 4. Test New configuration 5. Train staff 6. Implement - process	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 e)	Limitations on Non-payment Disconnections for Multi-Meter Premises: All of the limits, prohibitions and protections to customers offered in Sections 280.130 and 280.135 shall apply equally to lack of access disconnections of multi-meter premises for non-payment.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 f)	Reconnection: The utility shall not disconnect a building unless it has the resources in place and is prepared to reconnect service on the same day as the disconnection or the day access is provided for any customers of a multi-meter premises who were otherwise not eligible for non-payment disconnection.			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g)	Data Collection and Maintenance: The utility shall collect the following data on a monthly basis and maintain the data for two years following its collection. The utility shall make the data available to Commission Staff within 30 days after a request from Staff:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) 1)	In addition to the record keeping required under subsection (c)(2), the utility shall record the total number of "at-risk" buildings (i.e., any buildings the utility believes are currently eligible for disconnection or would be eligible for disconnection in 30 days);	The items related to section 280.140/280.150/280.130/280.135 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Develop reports 3. Update business process/policy documentation 4. Test Reports 5. Train staff 6. Implement - rollout tracking and report process	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) 2)	The utility shall retain a record of the following information regarding a disconnection event:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) 2) A)	Address of building or facility disconnected			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) 2) B)	Number of units affected by the disconnection;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) 2) C)	Duration of the building disconnection from the date of the disconnection to the date that the building was reconnected;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) D)	Cause for multi-unit disconnection;			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) 2) E)	The utility shall retain a record of the following information regarding a disconnection event: Compensation credit issued; and	The items related to section 280.140/280.150/280.130/280.135 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Develop reports 3. Update business process/policy documentation 4. Test Reports 5. Train staff 6. Implement - rollout tracking and report process	Q1 2016	Not Started
Subpart I: Disconnection	Section 280.140	Disconnection for Lack of Access to Multi-Meter Premises	280.140 g) F)	Customer contacts received prior to and as a result of disconnection and their given reason for failure to provide access.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.150	Disconnection of Master-Metered Apartment Buildings	280.150	Disconnection of Master-Metered Apartment Buildings: Reference to Governing Statute: The Rental Property Utility Service Act [765 ILCS 735] governs procedures for disconnection of service to accounts affecting master-metered apartment buildings when a landlord or property manager has not paid the utility bill for the master-metered account. These procedures include requirements for a utility to:			Prior to Dec 31, 2014	In Place
Subpart I: Disconnection	Section 280.150	Disconnection of Master-Metered Apartment Buildings	280.150 a)	Inform tenants of the pending disconnection of their utility service; and			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart I: Disconnection	Section 280.150	Disconnection of Master-Metered Apartment Buildings	280.150 b)	Set out their remedies, including the right to petition a court for appointment of a receiver to collect rents and remit a portion of the rents to the utility for payment of utility bills.	The items related to section 280.140/280.150/280.130/280.135 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Requires business process changes The next period of high consumption will be 2015 winter. These disconnect rules to be in place prior to then.	1. Define requirements 2. Develop notification 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 a)	Medical Certification: Intent: The purpose of this Section is to temporarily prohibit disconnection of utility service to a residential customer for at least 60 days in cases of certified medical necessity; and to provide an opportunity for the customer to retire past due amounts by periodic installments under an automatic medical payment arrangement commencing after 30 days.			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 b)	Certifying Parties: Certification may be made by either a licensed physician or a local board of health.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 c) 1)	Method of Certification: Initial certification by phone call is allowed.			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 c) 2)	Written (may be mailed, faxed or delivered electronically) certification must be provided within 7 days after an initial certification by phone call.			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 d) 1)	Certificate Content: Name and contact information for the certifying party;			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 d) 2)	Service address and name of patient;			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 d) 3)	A statement that the patient resides at the premises in question; and			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 d) 4)	A statement that the disconnection of utility service will aggravate an existing medical emergency or create a medical emergency for the patient.			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 e) 1)	Certificate Timing: Certificate presentation prior to disconnection entitles a customer to receive a medical payment arrangement term, as described under subsection (i)(1).			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 e) 2)	The certificate may be presented up to 14 days after disconnection, with utility discretion as to whether it shall accept a certificate more than 14 days after disconnection have passed. Certification presented after disconnection entitles a customer to receive a medical payment arrangement term, as described under subsection (i)(2).			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 f) 1)	Restoration: When a valid medical certification is provided to the utility up to 14 days after disconnection, service shall be restored within one day after the provision of certification.			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 f) 2)	The utility shall not treat the disconnected customer as an applicant for service for purposes of restoration under a medical certificate.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 g)	Duration of Certificate: The certificate shall protect the account from disconnection for 60 days after the date of certification. If the customer was disconnected prior to certification, the 60 day period shall not begin until the utility restores the customer's service.	The items related to payment arrangements in section 280.100, 280.120 and 280.160 and 280.130 m, which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff	1. Define requirement/policies 2. Design/Configure CIS 3. Update business process/policy documentation 4. Test Configuration 5. Train staff 6. Implement	Q1 2016	Not Started
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 h)	Data Collection and Maintenance: The utility shall collect the following data on a monthly basis and maintain the data for two years following its collection. The utility shall make the data available to Commission Staff within 30 days after a request from Staff:			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 h) 1)	The total number medical certificates requested and, in instances in which a utility declines to issue a medical certificate, the reason for denial;			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 h) 2)	The total number of medical certificates issued by the utility;			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 h) 3)	The duration, including start and end dates, of the medical certification period (whether the end date is based on payment by the customer or expiration of the 60-day period).			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 1)	Medical Payment Arrangement: If valid medical certification is received prior to disconnection, the first bill statement that will be due after 30 days after the certification date shall indicate:	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 1) A)	An amount to pay that is equal to 1/12th of the total amount owing for utility services by the customer;	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 1) B)	The remaining balance owing for utility services;	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) - 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 1) C)	That the customer is on a medical payment arrangement; and	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 1) D)	11 remaining installments of equal amounts to be paid on future bills.	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 2)	If valid medical certification is received after disconnection, the first bill statement that will be due after 30 days after the certification date shall indicate:	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 2) A)	An amount to pay that is equal to 1/4th of the total amount owing for utility services by the customer;	Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time. Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.	1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 2) B)	The remaining balance owing for utility services;	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 2) C)	That the customer is on a medical payment arrangement; and	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 2) D)	Nine remaining installments of equal amounts to be paid on future bills.	<p>Requires system changes - multiple vendors (CIS, Bill Print). This requirement will be grouped with other Rule 280 bill changes to leverage the same testing cycle, customer communications, and minimize risk by doing one update rather than multiple changes in close succession into production. Therefore scope is greater than this requirement alone and will take additional time.</p> <p>Current Liberty Utilities bill presentment project in progress to be implemented Apr 30, 2015. Rule 280 bill presentment change work will begin subsequently.</p>	<ol style="list-style-type: none"> 1. Requirements 2. Update business process/policy documentation 3. Vendor development - (CIS/Bill print vendor) - 4. Test changes 5. Training 6. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 i) 3)	Valid medical certification shall entitle a customer to an MPA, regardless of the success or failure of previous payment plans of any sort.	The items related to payment arrangements in section 280.100, 280.120 and 280.160 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. Need to develop /update business process/policy and related documentation. Need to train staff Need to create/update forms.	1. Define requirement/policies 2. Update business process/policy documentation 3. Train staff 4. Implement	Q1 2016	Not Started
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 j)	New Certification of Previously Certified Accounts: Accounts that received a prior valid medical certificate shall be eligible for new certification any time after either:			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 j) 1)	The total account balance has been brought current; or			Prior to Dec 31, 2014	In Place
Subpart J: Medical Certification	Section 280.160	Medical Certification	280.160 j)2)	12 months from the beginning date of the prior certification has passed			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 a)	Timely Reconnection of Service: Intent: This Section provides for the timely reconnection of disconnected customers after they have remedied the reasons for the disconnection or provided valid medical certification.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 b)	Timing: Once a disconnected customer remedies the reason for the disconnection or provides a valid medical certificate, the utility shall prioritize reconnection as indicated in this subsection (b). If the utility does not comply with the time limits in this subsection (b), it shall not bill the customer a reconnection charge. If, through no fault of the customer, the utility delays reconnection for two or more calendar days beyond the number of days required in this subsection (b), it shall issue a credit to the customer's account equal to two non-prorated monthly customer charges for that customer. If a disconnection is made in error, the penalty shall be an amount equal to three non-prorated monthly customer charges, in addition to any reconnection fees made for non-timely reconnection.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 b) 1)	A customer account for which a valid medical certificate has been provided shall receive first priority and be reconnected within one business day after the certification.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 b) 2)	A customer disconnected in error shall be reconnected within one business day.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 b) 3)	A disconnected electric, water or sewer customer who remedies the reason for the disconnection, and is not required by the utility to provide information as a new applicant for service, shall be reconnected within four calendar days.				N/A
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 b) 4)	A disconnected natural gas customer who remedies the reason for the disconnection, and is not required by the utility to provide information as a new applicant for service, shall be reconnected within seven calendar days.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 c)	Exception for Lack of Access: A utility shall not be obliged to conform to the time limits in subsection (b) if it is not allowed access to reconnect the service; provided, however, that the utility must record the date, time of day, utility personnel involved and reason access was not gained. It shall retain the record for two years.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 d)	Exception for Disconnection not at the Meter or not at the Normal Place of Disconnection: A utility shall not be obliged to conform to the time limits in subsection (b) if it was forced, by lack of access, to disconnect the service at a location other than the meter or at a place other than the normal place of disconnection if the utility does not normally disconnect service at the meter.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 e)	Exception for Damage or Unsafe Condition: A utility shall not be obliged to conform to the time limits of subsection (b) if repair, construction or correction of an unsafe condition is required prior to reconnection of service.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 f)	Temporary Exception for Unforeseen Circumstances: A utility that experiences a temporary, unanticipated and not reasonably foreseeable overload of its ability to provide for the timely reconnection of disconnected customers may, upon notice explaining the circumstances to the Commission's Consumer Services Division, temporarily forego the requirements of this Section so long as the utility can demonstrate that it is taking diligent action to remedy the overload.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.170	Timely Reconnection of Service	280.170 g)	If service was shut off in error, the utility shall not bill the customer a reconnection charge.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 a)	Reconnection of Former Residential Customers for the Heating Season: Any former residential customer whose gas or electric service was used to provide or control the primary source of space heating in the dwelling and whose service is disconnected for non-payment of a bill or a deposit from December 1 of the prior winter's heating season through April 1 of the current heating season shall be eligible for reconnection and a deferred payment arrangement under the provisions of this Section. Under this Section, a former residential customer shall also include a former customer who has moved to a new location after the service at the customer's former premises was disconnected. However, it shall be the responsibility of the former customer to notify the utility of his or her need for service at the new premises, and a utility shall not be obliged to search for former customers who have moved for the purpose of subsection (g).			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 b)	Limitations: A utility shall not be required to reconnect service to and enter into a deferred payment arrangement with a former customer under the provisions of this Section:			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 b) 1)	Except between November 1 and April 1 of the current heating season for former customers who do not have applications pending for the program described in Section 6 of the Energy Assistance Act [305 ILCS 20/6], and except between October 1 and April 1 of the current heating season for all former customers who do have applications pending for the program described in Section 6 of the Energy Assistance Act and who provide proof of application with the utility.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 b) 2)	<i>In two consecutive years;</i>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 b) 3)	<p><i>Unless that former customer has paid at least 33 1/3 percent of the amount billed for utility service rendered by that utility subsequent to December 1 of the prior year. A former customer who did not pay the required amount prior to disconnection may establish eligibility by paying the required amount when seeking reconnection under this Section. In addition to calculating the 33 1/3 percent the former customer must pay to establish eligibility, the utility shall calculate the amount the customer must pay to enter into a payment agreement. For purpose of simplification, the utility shall inform the customer of the total amount needed for reconnection, including amounts required under subsections (b)(3), (b)(4), (d) and (e). The utility shall accept multiple sources of payment, including but not limited to energy assistance program payments, for purposes of satisfying this requirement.</i></p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 b) 4)	<i>Until the customer pays the charges associated with the tampering, in any instance where the utility can show that there has been tampering with the utility's wires, pipes, meters (including locking devices), or other service equipment and further shows that the former customer enjoyed the benefit of utility service in the aforesaid manner.</i>			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 c)	DPA: The terms and conditions of any deferred payment arrangements established by the utility and a former customer shall take into consideration the following factors, based upon information available from current utility records or provided by the former customer:			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 c) 1)	<i>The amount past due;</i>			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 c) 2)	<i>The former customer's ability to pay;</i>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 c) 3)	<i>The former customer's payment history;</i>			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 c) 4)	<i>The reasons for the accumulation of the past due amounts; and</i>			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 c) 5)	<i>Any other relevant factors relating to the former customer's circumstances.</i>			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 d)	<i>After the former customer's eligibility has been established in accordance with subsections (a) and (b), and, upon the establishment of a deferred payment agreement, the former customer shall pay 1/3 of the amount past due (including reconnection charge, if any) and 1/3 of any deposit required by the utility.</i>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 1)	Reconnection: Upon payment of the 1/3 of the amount past due and 1/3 of any deposit required by the utility, the former customer's service shall be reconnected as soon as possible. The company and the former customer shall agree to a payment schedule for the remaining balances which will reasonably allow the former customer to make the payments on the remainder of the deposit and the past due balance while paying current bills during the winter heating season.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2)	Notwithstanding the requirements of subsection (e)(1), a former customer who demonstrates to the utility, or to the Commission through formal or informal complaint under Sections 280.220 or 280.230, a financial inability to meet the requirement of the 1/3 of the amount past due and 1/3 of any deposit requested by the utility shall be reconnected upon paying a reasonable amount and upon entering into a deferred payment agreement			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) A)	In determining financial inability under this subsection (e)(2), the following factors, among others, shall be considered:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) A) i)	The combined income and financial resources of all persons residing in the former customer's household;			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) A) ii)	The combined living expense of the former customer's household;			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) A) iii)	The former customer's payment history; and			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) A) iv)	The reasons for the accumulation of past due amounts.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) B)	A low income customer as defined by this Part shall automatically qualify for financial inability under this subsection (e)(2).			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 2) C)	For purposes of this subsection (e)(2), a "reasonable amount" shall be 20 percent of the amount past due and 20 percent of any deposit required by the utility.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 e) 3)	However, the utility is not obliged to make payment arrangements extending beyond the following November. The utility shall allow the former customer a minimum of four months in which to retire the past due balance and a minimum of three months in which to pay the remainder of the deposit. The former customer shall also be informed that payment on the amounts past due and the deposit, if any, plus the current bills must be paid by the due date or the customer may be subject to disconnection of service.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 f)	Any payment agreement made shall be in writing, with a copy provided to the former customer. The renegotiation and reinstatement provisions contained in Sections 280.120 and 280.125 and the budget payment plan provisions of Section 280.80 shall also apply to payment agreements made pursuant to this Section.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 g) 1)	Survey and Notice to Affected Customers: Not later than September 15 of each year, every gas and electric utility shall conduct a survey of all former residential customers whose gas and/or electric service was used to provide or control the primary source of space heating in the dwelling and whose gas and/or electric services was terminated for non-payment of a bill or deposit from December 1 of the previous year to September 15 of that year and where service at that premises has not been restored.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 g) 2)	Not later than October 1 of each year, the utility shall notify each of these former customers that the gas and/or electric service will be restored by the company for the coming heating season if the former customer contacts the utility and makes arrangements to pay the past due balance and any deposit to the utility under the conditions set forth in this Section.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 g) 3)	A utility shall notify the former customer or an adult member of the household by personal visit, telephone contact or mailing of a letter by first class mail to the last known address of that former customer. The utility shall keep records which would indicate the date, form and results of the contact.			Prior to Dec 31, 2014	In Place
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 g) 4)	Any former customer who meets the eligibility requirements under subsections (a) and (b) shall be eligible for reconnection under this Section, regardless of whether the utility identified the former customer in the survey requirements of this subsection (g) and regardless of whether that former customer received notification under this subsection (g).			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 h)	Not later than November 20 and May 20 of each year, each gas and electric utility that has former customers affected by this Section shall file a report with the Commission providing statistical data concerning numbers of disconnections and reconnections involving utility service and deposits, and data concerning the dollar amounts involved in these transactions. The Commission shall notify each gas and electric utility prior to August 1 of each year concerning the information which is to be included in the report for the following heating season.	This is difficult/complex report to build. Report needs to track former customer's related information after reconnection. System changes and policy and procedure changes must be made in order to identify, track and report information.	<ol style="list-style-type: none"> 1. Define requirements 2. Develop reports 3. Update business process/policy documentation 4. Test Reports 5. Train staff 6. Implement - rollout tracking and report process 	Q1 2016	Not Started
Subpart K: Reconnection	Section 280.180	Reconnection of Former Residential Customers for the Heating Season	280.180 i)	In no event shall any actions taken by a utility in compliance with this Section be deemed to abrogate or in any way interfere with the utility's rights to pursue the normal collection processes otherwise available to it. [220 ILCS 5/8-207]			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 a)	Treatment of Illegal Taps: Intent: The purpose of this Section is to require the utility to investigate high bills resulting from an abnormal or unexplained increase in consumption alleged by a customer. The utility shall investigate the allegation, to the extent customer-owned facilities are readily visible or accessible, to determine the reason and whether the consumption is caused by an illegal tap or diversion of service.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 b)	Utility Investigation: When, within 30 days after receipt of a utility's bill, a customer alleges that the level of consumption is unreasonably high, the public utility furnishing natural gas, electricity or water to that customer shall investigate the allegation.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 c)	Notice of Investigation Results: If, as a result of the investigation, the public utility determines that a tap has been constructed on the pipes and/or wires of the customer, the utility shall attempt to notify the landlord, property owner or his or her agent and instruct that the tap be removed immediately. The customer shall also be provided with notice of the investigation results.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 d)	Disconnection of Service: This Section shall in no way prohibit a utility from disconnecting service if the utility determines that an unsafe condition exists.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 e)	Utility Determination of Benefitting Party: The utility shall also attempt to determine the identity of the party benefitting from the tapped service. The following procedures shall apply once the tap has been removed:			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 e) 1)	The customer whose pipes and/or wires had been tapped by a third party shall be billed by the utility according to the newly established usage pattern and/or degree day analysis, whichever is appropriate.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 e) 2)	If the utility identifies the third party and finds that the third party is currently a customer of the utility on another account, the utility is authorized to bill that third party's account for the excess usage that is not attributable to the customer whose line had been tapped plus all related expenses incurred by the utility.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 e) 3)	If the utility identifies the third party and finds that the third party is not a customer of the utility, the utility is authorized to bill that third party for the excess usage that is not attributable to the customer whose line had been tapped plus all related expenses incurred by the utility using the procedures established for the billing of unauthorized use of utility service.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 e) 4)	In cases when the utility cannot determine the identity of the party benefitting from the tap, the utility may assign the dollar amount representing the excess usage and expenses to its bad debt account.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 f)	Construction Error: When the diversion of gas, electricity or water is the result of a construction error in the pipes and/or wires that is not the responsibility of the public utility, the accounts of the customers involved may be adjusted according to the newly established usage pattern and/or degree day analysis, whichever is appropriate.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.190	Treatment of Illegal Taps	280.190 g)	When the customer of record benefitted from, cooperated in or acquiesced to the tap, the utility may collect all related expenses from the customer of record for the services associated with the tap.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 a)	Tampering: Intent: Tampering with utility wires, pipes, meters or other service equipment is prohibited. The intent of this Section is to describe the process by which the utility shall bill the customer for the unauthorized usage when the utility has proof that the customer benefitted from tampering.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 b)	Proof: The utility has the burden of proving by a preponderance of the evidence that tampering has occurred with the utility's wires, pipes, meters or other service equipment, that the customer has benefitted from the tampering, and that the utility's billing is reasonable.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 c)	Investigation: When the utility has reason to suspect that tampering has occurred, it shall investigate without delay.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 d)	Notice to Customer: Once the utility has full proof of the tampering, it shall report to the customer the details of the investigation.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 e)	Remedy: As soon as the condition becomes known to the utility, it shall take steps to correct the condition and issue a corrected bill without delay. Pursuant to any tariffed meter tampering charge, before assessing the charge, the utility shall review the situation to determine if the person benefitting from the tampering was responsible either directly or indirectly for the tampering.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 f)	Timing: If tampering evidence extends to previous customers of record, the current customer shall not have to pay for the portions of the unauthorized usage that are attributable to the previous customers.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.200	Tampering	280.200 g)	Record Keeping: The utility shall document and record the evidence that proves the tampering, and it shall save the full evidence proving the tampering for a minimum of three years from the date that the customer is issued a corrected bill for the tampering.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.205	Non-Residential Tampering	280.205 a)	Non-Residential Tampering: Intent: The provisions of Section 280.200 shall apply in cases of non-residential tampering. In addition, this Section shall provide the utility with immediate relief from further unauthorized usage of service by a non-residential customer.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.205	Non-Residential Tampering	280.205 b)	Disconnection: When the utility has evidence proving the unauthorized use of non-residential service, it may disconnect service to the tampering customer until:			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.205	Non-Residential Tampering	280.205 b) 1)	The utility or the customer removes the facilities that allow the customer to use service without paying for it. If the utility must remove the facilities, the customer shall pay the costs associated with the work; and			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.205	Non-Residential Tampering	280.205 b) 2)	The customer pays for the unauthorized usage. The utility shall determine the amount of unauthorized usage and provide a bill to the customer without delay.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 a)	Payment Avoidance by Location: Intent: With the understanding that a utility and its customers must deal in good faith with each other, this Section defines the process by which a utility may protect itself and its ratepayers from persons seeking to use a pattern of action to avoid payment for service used at a specific service location.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 b)	<p>Conditions: Payment avoidance by location (PAL) applies only when <u>all</u> the following conditions occur:</p> <p>1) a utility receives a new application for service at a service location;</p> <p>2) a former customer who was disconnected for non-payment at the same service location still resides at the service location; and</p> <p>3) the utility has proof that the new applicant for service also occupied the service location during the time the previous customer's debt accrued.</p>	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<p>1. Define requirement/policies</p> <p>2. Develop forms/letters/develop and test reports</p> <p>3. Update business process/policy documentation</p> <p>4. Train staff</p> <p>5. Implement</p>	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 c)	Exemption: Payment avoidance by location shall not include new owners and/or new tenants at a service location.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 d)	Notification of PAL: When a utility can demonstrate with evidence that a pattern of payment avoidance is occurring by a person or persons at a location, in order to invoke the protections of this Section, it shall provide the following notice:	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 d) 1)	The utility shall notify the person of the PAL allegation using the same method of contact by which that person contacted the utility.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 d) 2)	The utility shall notify the person of the PAL allegation in writing. The written notification may be sent electronically if agreed upon by the utility and the person receiving the notification.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 d) 3)	The notice shall be sent no later than two business days after the utility's decision to invoke the protections available to it under this Section.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 d) 4)through 6)	<p>4) The notice shall contain a detailed description of the problem and the facts and evidence that the utility has to support the PAL allegation.</p> <p>5) The notice shall contain an explanation of the steps that the person must take in order to dispute or remedy the problem.</p> <p>6) The notice shall contain the toll free number and contact information for the utility and the toll free number and contact information for the Commission's Consumer Services Division.</p>	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<p>1. Define requirement/policies</p> <p>2. Develop forms/letters/develop and test reports</p> <p>3. Update business process/policy documentation</p> <p>4. Train staff</p> <p>5. Implement</p>	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 d) 7)	A duplicate copy of the notice shall be sent to the Commission's Consumer Services Division at the same time it is sent to the person.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 e)	Deposit: When a utility has proof that PAL is occurring, it may require the applicant to provide a deposit under the following conditions:	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 e) 1)	A deposit required under this Section shall be equal to 1/3 of the estimated annual charges for the premises.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 e) 2)	The utility may require payment of the deposit in full prior to service.	The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process. Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms	1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement	Q1 2016	Not Started
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 e) 3)	The deposit shall earn interest as described in Section 280.40.			Prior to Dec 31, 2014	In Place
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 e) 4)	The deposit plus interest shall be refunded as described in Section 280.40.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 f)	Burden of Proof: It shall be the sole responsibility of the utility to prove with evidence that PAL has occurred. The person accused of PAL shall have the right to the full evidence possessed by the utility and the opportunity to present information to refute the allegations.	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation. Need to train staff Need to create new reports/letters/tracking mechanisms</p>	<ol style="list-style-type: none"> 1. Define requirement/policies 2. Develop forms/letters/develop and test reports 3. Update business process/policy documentation 4. Train staff 5. Implement 	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart L: Unauthorized Service Usage	Section 280.210	Payment Avoidance by Location	280.210 g)	<p>Data Collection and Maintenance: A utility that includes this Section as part of its practices shall collect the following data on a monthly basis and maintain the data for two years following its collection. The utility shall make the data available to Commission Staff within 30 days after a request from Staff:</p> <p>1) The total number of instances in which the utility alleged that PAL occurred;</p> <p>2) The total number of PAL instances in which the utility denied service;</p> <p>3) The total number of PAL instances in which the utility required a deposit to begin service;</p> <p>4) The total number of PAL instances in which the person successfully refuted the utility's evidence of PAL;</p> <p>5) The total number of PAL instances in which the utility discovered that its evidence was inaccurate; and</p> <p>6) The total number of PAL instances in which the person remedied the problem by payment of the arrearage accrued for disconnection of the previous customer.</p>	<p>The items related to Payment Avoidance by Location - section 280.40 and 280.210 which are not currently in place are being grouped into a 'sub-project' to ensure a holistic process is developed. This is a brand new process.</p> <p>Need to develop /update business process/policy and related documentation.</p> <p>Need to train staff</p> <p>Need to create new reports/letters/tracking mechanisms</p>	<p>1. Define requirement/policies</p> <p>2. Develop forms/letters/develop and test reports/CIS configuration</p> <p>3. Update business process/policy documentation</p> <p>4. Train staff</p> <p>5. Implement</p>	Q1 2016	Not Started

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 a)	Intent: To provide utilities and customers with the ability to resolve complaints or appeal complaints that cannot be resolved directly between the parties.			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 b)	Customer Contact: The customer must contact the utility and attempt to resolve the complaint directly with the utility before proceeding to the Commission's informal complaint process. The customer and the utility shall cooperate to resolve the complaint.			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 c)	Methods of Contact: The utility shall maintain local and/or toll free telephone numbers; a mailing address to receive customer complaints and correspondence; and, when the utility has the capability, a means of receiving electronically submitted complaints.			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 d)	Availability: The utility shall maintain regular business hours and staffing to answer all customer inquiries and complaints.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 e)	Complaint Response Timeline: The utility shall respond to complaints within 14 days after their receipt, with exceptions in which both the customer and the utility agree to an extension or in which the utility can demonstrate to the customer that more time is required by circumstances beyond its control			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 f)	Customer Payment During Complaint: If the complaint involves a dispute over the amount billed: 1 - The customer shall pay the undisputed portion of the bill or an amount equal to last year's bill at the location for the same period normalized for weather; 2 - The utility shall confirm the disputed portion and the amount to be paid by the customer; and 3 - The utility shall note and set aside the disputed amount in its records for the account.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 g)	<p>Late Fees:</p> <p>1 - No late fees may be assessed on any amount in dispute while the complaint remains unresolved.</p> <p>2-No late fees may be assessed on a previously disputed amount so long as the customer pays the previously disputed amount within 14 days after the resolution of the complaint and so long as the complaint was made to the utility before the disputed amount became past due.</p>			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 h)	<p>Third Party Services and Billing: If the customer's complaint involves a service or good provided by a party other than the utility and the third party uses the utility for billing purposes, then the utility shall make a record in its files of the complaint and advise the customer how to contact the third party. The utility shall refrain from applying a customer's payment towards any amount in dispute with a third party on the bill until the complaint involving that portion of the bill has been resolved.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 i)	<p>Appeal to Supervisor:</p> <p>1 - If the customer requests a referral to a supervisor, the utility personnel shall note the account and make the referral the same day.</p> <p>2 - The supervisory personnel must respond to the customer without delay, and priority shall be given:</p> <p>A) First to customer accounts that are disconnected or when a health or safety concern has been raised by the customer;</p> <p>B) Second to customer accounts in jeopardy of disconnection; and</p> <p>C) Third to all other supervisory referrals.</p>			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 j)	All customer complaints must be assigned a complaint number that shall be retained by the utility for two years.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 k)	Prohibition Against Disconnection: The utility shall not disconnect a customer's utility service during the pendency of a complaint for any amount or reason that is the subject of the complaint. However, nothing shall prevent the utility from disconnecting service for reasons of safety or cooperation with civil authorities.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	Section 280.220	Utility Complaint Process	280.220 l)	<p>Appeal to Commission Complaint Process: Once a final answer is provided to the customer, and, if the customer indicates non-acceptance of the response:</p> <p>1 -The utility shall advise the customer of the right to appeal the utility's answer to the Commission's Consumer Services Division for an informal complaint;</p> <p>2- The utility shall provide the customer with the contact information for the Commission's Consumer Services Division; and</p> <p>3 -In the case of a pending disconnection, the utility shall refrain from disconnection for at least three business days to allow the customer to contact the Commission's Consumer Services Division.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 a)	Intent: This Section provides utilities and customers with a process through the Commission's Consumer Services Division that allows the parties to settle a dispute without litigation; or to appeal an ongoing conflict that cannot be resolved informally to the Commission's formal complaint process			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 b)	Intake of Complaints by the Commission's Consumer Services Division: 1 - Telephone or in person: The Consumer Services Division shall perform a customer interview and draft an informal complaint, including a description of the dispute and the relief sought. Telephone or in person informal complaints may also be taken from the customer's designated representative. 2 - Writing: The customer or the customer's designated representative may submit informal complaints in writing, either electronically or through traditional mail or fax (if available), to the Consumer Services Division.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 c)	<p>Presentation of the Complaint to the Utility:</p> <p>1)Except as noted in subsection (c)(2), the complaint shall be submitted by the Consumer Services Division to the utility in writing and shall contain as much of the following information as is available: the customer's name, service address, mailing address if different from service address, phone number, account number, any alternative contact information; a description of the complaint; and the relief being sought by the customer</p> <p>2)If all the parties agree, the written informal complaint process may be waived, and the Consumer Services Division may work to resolve the complaint by immediate direct contact between the parties at the time the customer initiates the informal complaint.</p>			Prior to Dec 31, 2014	In Place
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 d)	<p>Timeline to Answer:</p> <p>1)The utility shall answer the informal complaint within 14 days.</p> <p>2) The Consumer Services Division shall mark as "urgent" those informal complaints that should be handled by the responding party on a priority basis.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 e)	Extensions: By contact with the Consumer Services Division prior to the lapse of the 14 day response period, the utility may seek to extend the timeline for a response. Consumer Services Division Staff shall decide whether to grant the extension.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 f)	<p>Utility Answer to the Informal Complaint:</p> <p>1) Except when the parties agree to a non-written response, the utility's answer to the Consumer Services Division shall be made in writing and shall contain:</p> <p>a)A detailed description of the utility's position on the complaint, including the reasons for taking the position;</p> <p>b)If applicable, a reference to the section of the tariff, rule or law that supports the utility's position;</p> <p>c)A description of any interaction between the utility and the customer in answering the informal complaint.</p> <p>d)The amount of any adjustments to the customer's bill;</p> <p>e)The results of any tests performed on the equipment serving the customer; and</p> <p>f)Any additional information requested by the Commission Staff.</p> <p>2 - Review of answer with customer: After receipt of the utility response, the Consumer Services Division shall have 14 days to contact the customer to review the results of the informal complaint.</p> <p>3 -Ongoing dialogue/negotiations: Upon agreement of</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
				the customer and the utility, further discussion may occur between the parties after the response to the informal complaint.				

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 g)	Prohibition on Disconnection: The utility shall refrain from disconnecting a customer during an informal or formal complaint for any amount or reason that is the subject of the informal or formal complaint. However, nothing shall prevent the utility from disconnecting service for reasons of safety or cooperation with civil authorities.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 h)	<p>Right to Appeal:</p> <p>1- Except in situations in which to do so would cause the statute of limitations for filing a formal complaint to expire, any customer with a dispute arising under the jurisdiction of this Part shall first use the informal complaint process before proceeding with a formal complaint</p> <p>2 - If the customer expresses non-acceptance of the response to the informal complaint, and further dialogue cannot secure an agreement, the Consumer Services Division shall advise the complainant of the right to escalate the informal complaint to the Commission's formal complaint process.</p> <p>3 - If the utility fails to respond to the informal complaint within 14 days, the customer may file a formal complaint in accordance with the Commission's Rules of Practice (83 Ill. Adm. Code 200).</p> <p>4 - Upon a customer's request for escalation to a formal complaint, the Consumer Services Division shall provide notice to the utility of the customer's intent to escalate the complaint.</p> <p>5 - Upon notice from Consumer Services Division of the customer's intent to file a formal complaint, the utility shall provide a minimum of 10 business days for the customer to file the formal complaint without disconnection of service. Nothing, however, shall prevent the utility from disconnecting service for reasons of safety or compliance with civil authorities.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Complaint Procedures	280.230.	Commission Complaint Process	280.230 i)	<p>Timeline to File a Formal complaint to seek refund:</p> <p>1) - Excessive or unjust charges: All complaints for the recovery of damages shall be filed with the Commission within 2 years from the time the produce, commodity or service as to which complaint is made was furnished or performed. [220 ILCS 5/9-252]</p> <p>2) - Refunds for overcharges: When a customer pays a bill as submitted by a public utility and the billing is later found to be incorrect due to an error either in charging more than the published rate or in measuring the quantity or volume of service provided, the utility shall refund the overcharge with interest from the date of overpayment at the legal rate or at a rate prescribed by the Commission. Refunds and interest for such overcharges may be paid by the utility without the need for a hearing and order of the Commission. Any complaint relating to an incorrect billing must be filed with the Commission no more than 2 years after the date the customer first has knowledge of the incorrect billing. [220 ILCS 5/9- 252.1]</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Information	Section 280.240	Public Notice of Commission Rules		Each utility shall provide notice to customers of the availability of Commission rules. Notice substantially in the form shown in Appendix C shall be posted on any utility web site and written notice shall be provided to customers annually. The notice to customers may be in the form of a bill message in which customers will be provided the opportunity to obtain copies of the Commission's rules upon request or by accessing the utility's website.			Prior to Dec 31, 2014	In Place
Subpart M: Information	Section 280.250	Second Language Requirements		When there is a demonstrated need for second language notices in the service area of any utility, notices as set out in Appendices A and B sent to customers located within the area should contain the following warning in the appropriate second language: "Important – This notice affects your rights and obligations and should be translated immediately."			Prior to Dec 31, 2014	In Place
Subpart M: Information	Section 280.260	Customer Information Packet	Section 280.260 a)	a) - Intent: The utility shall develop customer information material and provide the material to customers without additional charge.			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Information	Section 280.260	Customer Information Packet	Section 280.260 b)	<p>b) Content:1)Description 2)Customer rights and responsibilities under this Part, including, at a minimum:a)A brief description of billing information such as frequency of billing, due dates, and electronic billing and other billing options;b) A description of the estimated bill process;c) Payment options, including budget payment plan and deferred payment arrangements;d)Payment methods and locations;e)Late fees;f)Deposit requirements;g)Disconnection and reconnection proceduresh)Utility dispute procedures and escalation procedures if a dispute is not resolved;i) Contact information for the utility;j) Commission's Consumer Services Division's informal complaint procedures;k) Contact information for the Commission's Consumer Services Division;l) A statement that the Commission's rules apply to service standards and reliability;m) Notice of the availability of the Commission's rules; andn)That special rights are available to low income customers, and how to qualify for low income customer status.</p>			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Subpart M: Information	Section 280.260	Customer Information Packet	Section 280.260 c)	c) Distribution : 1) Written copy sent or delivered to all new customers; 2)Written copy sent or delivered to customers upon request; 3) Material available on any utility web site; and 4)Notice that the material is available free of charge and instructions on obtaining material sent to all customers annually.			Prior to Dec 31, 2014	In Place
Subpart M: Information	Section 280.260	Customer Information Packet	Section 280.260 d)	Filing with Commission: The material shall be kept current and a current copy shall be filed with the Manager of the Consumer Services Division. Any changes in the material shall be presented to the Manager of the Consumer Services Division at least 45 days prior to being made available to customers.			Prior to Dec 31, 2014	In Place
Appendix	Section 280.Appendix A	Disconnection Notice	Section 280.Appendix A	Disconnection Notice			Prior to Dec 31, 2014	In Place
Appendix	Section 280.Appendix B	Customer Rights (Appearing on the reverse side of disconnection notices sent to residential customers)	Section 280.Appendix B	Customer Rights (Appearing on the reverse side of disconnection notices sent to residential customers)			Prior to Dec 31, 2014	In Place

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Subpart	Section	Section Description	Regulation Act	Description	Rationale for Delay	Description of work to complete	Implementation Date	Implementation Status
Appendix	Section 280.Appendix C	Public Notice	Section 280.Appendix C	Public Notice			Prior to Dec 31, 2014	In Place
Appendix	Section 280.Appendix D	Disconnection Notice Insert for Residential Gas and Electric Customers	Section 280.Appendix D	Disconnection Notice Insert for Residential Gas and Electric Customers			Prior to Dec 31, 2014	In Place

Table: Cost to implement remaining regulations

No.	Sub Project Name	Date	# of Regulations	Cost	Comments
1	Account Management	Q1 2016	9	\$40K	Process Changes (and reports/letters)
2	Landlord Changes	Q1 2016	3	\$40K	Process Changes (and reports/letters)
3	Low Income	Q1 2016	8	\$40K	Process Changes (and reports/letters)
4	Payment Arrangements (Default/Special/Medical)	Q1 2016	8	\$40K	Process Changes (and reports/letters)
5	Payment Avoidance Location	Q1 2016	15	\$40K	Process Changes (and reports/letters)
6	Due Date	Q1 2016	8	\$40K	
7	Late Fee	Q1 2016	6	\$40K	
8	Refunds	Q1 2016	4	\$40K	Process Changes (and reports/letters)
9	Disconnect	Q1 2016	16	\$40K	
10	Bill Presentment	Q1 2016	23	\$800K	Changes include Deposits, Payment Arrangements, Bill Corrections, Bill Messages.
11	Deposits	Q1 2016	5	\$40K	Process Changes (and reports/letters)
12	Other	Q1 2016	1	\$10K	
	Miscellaneous Items			\$900K	Includes: Test Environments Infrastructure/CIS modifications development and testing/Customer Communications and other items
	TOTAL		106	~ \$2.1 M	