

NRG Retail Northeast
3711 Market Street
Philadelphia, PA 19104

March 13, 2015

VIA ELECTRONIC FILING

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

**Re: Electronic Data Exchange Work Group (EDEWG) - Web Portal
Work Group Report – Docket No. M-2009-2092655**

Dear Secretary Chiavetta:

On February 17, 2015, the Electronic Data Exchange Work Group (EDEWG) filed a report with the Public Utility Commission ("PUC" or "Commission"). The report outlines recommendations and seeks Commission guidance on proposals to create a Web Portal to be used by Electric Generation Suppliers (EGSs) and Conservation Services Providers (CSPs) to access their customers' historical and 48 hour (or less) old Interval Usage (IU) data. The NRG Retail Affiliates ("NRG Retail") participated in the Web Portal Work Group (WPWG) discussions throughout 2014, providing input and proposing an alternative solution.¹

NRG Retail would like to make the Commission aware of significant concerns it has with the EDEWG report's recommendations, and to strongly urge the Commission to give clear, definitive guidance to the EDEWG and the utilities to develop a solution that will enable the market to deliver innovative products and services that engage and empower the Commonwealth's electricity customers to take control of their energy consumption. The proposed "consensus" solution described in the EDEWG report **will not** meet this goal.

As is explained in more detail below, NRG Retail urges the Commission to:

¹ NRG Retail Affiliates include Reliant Energy Northeast LLC d/b/a NRG Home, Green Mountain Energy Company and Energy Plus Holdings LLC.

1. Reject the "Single User – Multiple Requests (SU-MR)" solution as wholly insufficient, as it will not enable the market to meet the Commission's goal of empowering the Commonwealth's electricity consumers and should not be implemented.
2. Require the Electric Distribution Companies (EDCs) to implement the "Active EGS" Rolling 10-Day Solution no later than the third quarter 2015.
3. Determine whether SOAP is adequate to meet the needs of CSPs before requiring it to be implemented.

Delivering the Full Value of Smart Meters to Pennsylvania's Electricity Consumers Requires Fast, Daily Access to 48 Hour (or less) Old Interval Usage Data

An EGS's ability to deliver product innovations that empower consumers to take control of their energy consumption hinges on timely access to their customers' real time IU data every single day.²

Moreover, EGSs need to be able to retrieve that data as fast as possible each day so they can quickly load data into their systems and present it to their customers swiftly. The key to being able to offer customers products and services that enable them to change their behavior and shift their energy consumption is communicating information about their consumption to them as quickly as possible so they are able to make a connection between what they were doing at a given time with their electricity usage during that time. Consumers simply cannot remember what they did days, weeks or months after the fact – time is of the essence. We live in the age of "Amazon.com" consumerism. Customers expect instant access to timely information in all aspects of their lives from the number of steps they take in a day to instant access to movies online to the products and services they buy. The older the IU data that is provided to consumers, the less valuable and useful it is to motivating them. Commissions all over the country want retail suppliers to "engage" with consumers. The only way to do that is to require that the retail electricity industry generally, and utilities specifically, join the 21st

² To the extent the EDCs can provide interval usage data that is less than 48 hours old, the Commission should require them to do so – the more current the data is, the more valuable and useful it is to the customer, and the better products that will be delivered by the market.

century and provide access to customer data as absolutely quickly as possible.

The first step toward incenting consumers to change their behavior is engaging and educating them by providing information they can use in a convenient and easy to understand manner. In Texas, NRG Retail affiliate Reliant, currently has more than 700,000 customers benefiting from at least one Smart Energy Product or service. Reliant owns a Smart House in downtown Houston where they test new technologies and new products to determine the most practical in home applications so that they can then develop product and service offerings. Reliant provides all of its customers with free access to some basic home energy management tools including:

- An Account Management tool that allows customers to personally monitor their electricity use, set cost and usage alerts, and compare their energy use to that of their neighbors;
- Cost and Usage alerts – provided via email or text messages – notify customers when they are approaching any cost or usage thresholds they have selected;
- Home Energy Monitors that allow customers to track their usage in real time;
- Weekly Summary Emails that highlight the customer's electricity usage — and approximately what it costs — for the most recent week as compared to the week before it. This information is then used to generate an estimate of the next bill to help the customer better manage his/her electricity budget.

Once customers are educated and engaged, suppliers can offer them choices that build on their newfound knowledge – whether it be payment plans that help customers budget their energy costs more easily, pricing plans that encourage consumers to shift usage and conserve, or other value-added products.

With more informed, engaged customers suppliers then have a platform from which to take things to the next level and offer innovative new products and services designed to change how people use energy.

NRG Retail is eager to deliver these same innovations to its Pennsylvania customers. However, none of these innovations are possible if EGSs lack fast and easy access to all of their customers' 48 hour (or less) IU data every single day.

The "Single User – Multiple Requests" (SU-MR) Is Inadequate

The EDEWG report provides detailed standards for an SU-MR Web Portal and recommends it be implemented by the EDCs as the primary, and potentially only, way to meet the Commission's mandate "to develop a standardized solution for acquisition of IU data via a secure web-portal".³ The proposal is represented in the report as a "consensus" proposal, however, as the report notes, "During January 2014 WPWG meetings, several market participants voiced concerns regarding this approach and indicated a long-term preference for implementation of the "StS" framework (Option 3)."⁴ While the work group may have agreed that the detailed standards outlined in the report form the basis for ***minimal*** access to IU data via a web portal, there was no consensus that it should be implemented.

SU-MR is a ***manual*** process that requires users to request customer IU data ***one account at a time***. The system will enable a user to submit data requests for up to 10 customer accounts at a time, but each account must be manually submitted and added to the request one at a time before the request can be submitted. The system does not allow for any automation and, most significantly, it is not scalable. It is simply not possible for a supplier who has tens of thousands – or even thousands – of customers to obtain the IU data for those customers very quickly, every day. It's akin to computing with an abacus.

Simply stated, SU-MR will have no value to EGSs, will not be used, and would be an inefficient use of EDC resources and ratepayer dollars. It will

³ Pennsylvania Public Utility Commission Order entered December 6, 2012, Docket No. M-2009-2092655.

⁴ Web Portal Work Group Report filed by the Electronic Data Exchange Work Group (EDEWG), February 17, 2015, Docket No. M-2009-2092655, pp. 3. The only "Option 3" solution that is workable from the EGS perspective is the "Active EGS" 10-Day Rolling Average Solution proposed by NRG Retail.

not empower the Commonwealth's electricity consumers and should not be implemented.

The "Active EGS" Rolling 10-Day Solution is the Only Proposed Solution that will Enable EGSs to Deliver Innovative Solutions aimed at Empowering Pennsylvania's Electricity Consumers

NRG Retail offered the "Active EGS" solution during the work group process as a simple and easy to implement solution that will provide the data access EGSs need to deploy innovative products and services that leverage their customers' IU data on a large scale. This solution requires the EDCs to provide flat files (or "Batch CSV files") for each EGS that includes all of the 48 hour (or less) IU data for all of the customers being served by the EGS.⁵ The data files can be provided to EGSs via the EDCs existing secure supplier portals. In the same way that EGSs currently retrieve the Eligible Customer Lists from the utility web portals, an EGS would log into the existing supplier portal using an EDC-assigned username and password, download their data file(s), and begin the work necessary to translate that data into useful information for its customers. EGSs would continue to obtain historical IU data through the existing EDI process. Only EGSs that are licensed by the PUC and certified to do business with the EDCs have access to the supplier portals and an EGS would only be able to access the IU data for its own customers.⁶

The "Active EGS" solution is very similar to the IU data access methods employed in Texas and by the PHI utilities (Pepco and Delmarva Power) in Maryland, Delaware and the District of Columbia. In Texas, a single, standardized web portal is used by all transmission and distribution services providers (a.k.a. TDSPs – i.e., EDCs), retail suppliers and customers to transmit and access IU data for all customers. The TDSPs load the customer data into the system daily and suppliers access the system daily to download all of their customer data at one time. Similarly, suppliers in Maryland,

⁵ Again, to the extent the EDCs can provide interval usage data that is less than 48 hours old, the Commission should encourage require them to do so – the more current the data is, the more valuable and useful it is to the customer, and the better products that will be delivered by the market.

⁶ CSP access to both historical and interval usage data will likely require a different solution. However, NRG Retail estimates that the "Active EGS" solution will require only minimal EDC resources to implement and will not detract from the EDCs ability to develop and implement a different solution to deliver data access to the CSP community.

Delaware and the District can log onto the Pepco and Delmarva Power supplier portals and retrieve the data files for all of their customers daily.

The "Active EGS" solution is the only proposed solution that will provide EGSs with the quick and easy access to their customers' 48 hour (or less) IU data that is necessary to develop and deploy the innovative products and services that will 1) empower Pennsylvania consumers and 2) enable them to realize the full value of the very large AMI investment they have made.

The Commission should require the EDCs to implement the "Active EGS" solution instead of the SU-MR, and to do so by the end of the third quarter of 2015. NRG Retail is not aware of any technical or operational barriers to this solution being implemented quickly, and believes it can be implemented without an undue burden on EDC resources.⁷

EGSs and consumers have been waiting too long for access to this data. Moreover, EGSs will need time to bring new products and services to market. EGSs will need to (1) become familiar with and analyze the data, (2) design and program the systems needed to capture, store, analyze, and push that data to customers in real-time, and (3) develop, test, market and deliver new products that leverage that data to customers. The longer retail suppliers must wait to gain access to this data, the longer it will be before the innovative solutions that the Commission anticipates will be available to customers.

The "By Request" Simple Object Access Protocol Web Service (SOAP) Solution May be Necessary to Satisfy the Needs of CSPs

As detailed in the EDEWG report, SOAP provides secure web portal access to both EGSs and CSPs and allows them to request their customers' historical IU or 48 hour (or less) IU data one account at a time. SOAP will allow for automation so that an EGS or CSP computer system can communicate directly to an EDC's computer system. However, unlike the "Active EGS"

⁷ NRG Retail is well aware that the EDCs are currently devoting significant resources to the deployment of various initiatives including accelerated switching, seamless moves and instant connects. NRG Retail does not believe that the development of the "Active EGS" solution will require a reallocation of EDC resources currently devoted to those other important activities. Those solutions demand resources with EDI expertise, while the "Active EGS" solution does not.

solution, users will *not* be able to request or obtain IU data for *all* of their customers *at one time*.

An EGS serving tens of thousands – or even thousands – of customers would be forced to wait hours, if not an entire days, every day, before beginning the task of analyzing, parsing and converting the data retrieved from the utility system into useful information for its customers. SOAP simply cannot handle the number of requests or volume of data necessary for a retail supplier to effectively deploy a large scale retail product offer that is entirely dependent on the timely access to its customers' real time interval usage data. Moreover, multiple EGSs submitting high numbers of requests at the same time are likely to cause significant performance problems for the EDC systems. The EDEWG report acknowledges that "High request volume (both number of requests and volume of data requested) may impact the performance of the EDC's service," and the EDCs reserve the right to cap the number of requests within any given time window at their discretion.⁸

Given this significant limitation, SOAP has little to no value to EGSs like NRG Retail, who are interested in deploying innovative products and services on a large scale to all of its customers. As noted above, the significant delay in obtaining IU data significantly diminishes its usefulness and value for an EGS and would prevent an EGS from offering the innovation that will empower consumers.

NRG Retail is unsure whether SOAP would meet the needs of CSPs. Unlike EGSs, CSPs are not certified by the EDCs to do business and do not currently have the needed access to the EDCs secure web portal to avail themselves of the "Active EGS" 10-Day Rolling Solution proposed by NRG Retail. The Commission should explore whether SOAP would meet the CSPs needs before determining whether it should be implemented.

Conclusion

The EDEWG report argues that the "Active EGS" and the SOAP solutions be optional and that the EDCs be permitted to implement these solutions at their discretion. NRG Retail strongly disagrees. For all the reasons stated

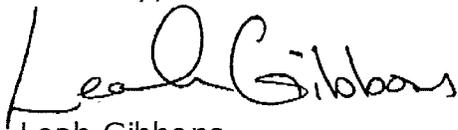
⁸ Web Portal Work Group Report filed by the Electronic Data Exchange Work Group (EDEWG), February 17, 2015, Docket No. M-2009-2092655, pp. 27.

above, NRG Retail urges the Commission to help propel Pennsylvania's electric service into the 21st Century by:

1. Rejecting "Single User – Multiple Requests (SU-MR)" as wholly insufficient, incapable of enabling the market to meet the Commission's goal of empowering the Commonwealth's electricity consumers, and should not be implemented.
2. Requiring the EDCs to implement the "Active EGS" Rolling 10-Day Solution no later than the third quarter 2015.
3. Determining whether SOAP is adequate to meet the needs of CSPs before requiring it to be implemented.

I appreciate the opportunity to share NRG Retail's perspective on the EDEWG's Web Portal Work Group report. Please feel free to contact me at 301.509.1508 or via email at lgibbons@nrg.com if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Leah Gibbons". The signature is written in a cursive, flowing style.

Leah Gibbons
Director, Regulatory Affairs

Electronic CC:
Office of Competitive Market Oversight