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March 25, 2015

**Via Electronic Filing**

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

Re: Electronic Data Exchange Working Group (EDEWG) – Web Portal Working Group  
Project, Docket No. M-2009-2092655

Dear Secretary Chiavetta:

The attached letter was filed electronically on Friday, March 20<sup>th</sup> at M-2014-2448825 which is the incorrect docket number. It should be filed at the above docket number. My apologies for the mistake.

Sincerely,

A handwritten signature in black ink that reads "Deanne M. O'Dell". The signature is written in a cursive, flowing style.

Deanne M. O'Dell

DMO/lww  
Enclosure

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March 20, 2015

**Via Electronic Filing**

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

Re: Electronic Data Exchange Working Group February 17, 2015 Proposal in Response to  
Smart Meter Procurement and Installation Implementation Order,  
Docket No. M-2014-2448825

Dear Secretary Chiavetta:

In response to the Commission's December 5, 2012 Order in the above referenced docket, the Electronic Data Exchange Working Group ("EDEWG") submitted a Pennsylvania Web Portal Working Group Solution Framework ("EDEWG Report") to the Commission for its consideration. As directed by the Commission, the purpose of the EDEWG Report is to develop a standardized solution for acquisition of interval usage data via a secure web-portal. The Commission expected the shorter-term solution to offer 12 months of historical usage ("HIU") data via a secure web platform, while the longer-term solution would provide billing quality interval usage ("IU") data within 24 to 48 hours of meter reads. Also relevant is the Commission's April 4, 2013 Secretarial Letter which advised EDEWG of the Commission's support for a web-based solution so that electric generation suppliers ("EGSs") and customers "may view key usage information in a single place, or a web-based solution for customer usage data, which can provide information in a timely manner to enable real time pricing to customers."<sup>1</sup>

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<sup>1</sup> The Commission's April 4, 2013 Secretarial Letter followed the Commission's final order regarding the default service plan of the FirstEnergy Companies which became effective on June 1, 2013 which agreed with RESA that delays in customer interactions inherent in FirstEnergy's systems needed to be addressed and should be addressed by EDEWG in the context of this process. *Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company and West Penn Power Company For Approval of Their Default Service Programs*, Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669, and P-2011-2273670, Opinion and Order entered August 16, 2012 at 157 ("*FirstEnergy DSP II Proceeding*").

In response to these directives, the EDEWG Report defines the “minimal standards” for the “chosen” manual portal framework,<sup>2</sup> i.e. the “Single User – Multiple Requests” (“SU-MR”), while leaving any related items not specifically addressed at the discretion of the individual EDCs.<sup>3</sup> The EDEWG Report also notes that representatives expressed a long-term preference for EDC implementation of a System-To-System (“StS”) approach for accessing interval usage data that allows an authorized user’s IT systems to communicate directly with the secure web portal system of the EDC.<sup>4</sup> While information about potential StS approaches was included with the report, EDEWG members did not reach a consensus on the mechanics of an StS approach or whether or not EDCs should be required to implement such approach.

Consistent with the letter filed by NRG Retail Affiliates (“NRG Retail”), the Retail Energy Supply Association (“RESA”)<sup>5</sup> submits that the manual SU-MR process will not result in a meaningful and useful method by which suppliers can receive timely and reliable access to usage data to enable them to offer competitive and innovative products to customers. Because of this, RESA recommends that the Commission reject the SU-MR approach and, instead, require mandatory implementation of the System-to-System (“StS”) approach<sup>6</sup> which would require the EDCs to provide flat files to each EGS containing the 48 hour (or less) old IU data for all of the customers being served by the EGS (i.e. the “Active EGS Rolling 10-Day Solution”).<sup>7</sup>

RESA is a broad and diverse group of retail energy suppliers who share the common vision that competitive retail energy markets deliver a more efficient, customer-oriented outcome than a regulated utility structure. RESA’s members include Pennsylvania licensed suppliers of various sizes and business models. RESA as an organization as well as its individual members have been active participants in numerous Commission proceedings – including those focused on

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<sup>2</sup> Importantly, not all participants agreed that the SU-MR should be the “chosen” portal framework. *See* EDEWG Report, Appendix C.

<sup>3</sup> EDEWG Report at 2.

<sup>4</sup> EDEWG Report, Appendix B at 20.

<sup>5</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

<sup>6</sup> This is described in the EDEWG Report, Appendix C, pp. 36-38 (i.e. Position 2) and is the same solution referred to by NRG Retail as the “Active EGS Rolling 10-Day Solution” described on pp. 5-6 of the NRG Retail letter dated March 13, 2015.

<sup>7</sup> The Active EGS Rolling 10-Day Proposal is described on pp 24-25 in Appendix B of the EDEWG Report. Reasons in support of making it a mandatory requirement are detailed in the EDEWG Report, Appendix C, pp. 36-38 (i.e. Position 2).

addressing the needs of competitors regarding access to customer usage information. To that end, RESA has been a strong proponent of the ability of suppliers to be able to receive timely and reliable access to near real time usage data.<sup>8</sup> As RESA commented in 2010:

EGSs need timely and reliable access to usage data of [an EDC's] current customers so that they can accurately price alternate supply service and make a competitive offer to the customer. Delayed access to this information or receiving information that is not accurate may discourage competitors from coming into the market and could lead to confusion for customers if the EGS is either delayed or inaccurate in the price it offers only due to issues related to the underlying data.<sup>9</sup>

Just as important is the ability of EGSs to have timely and reliable access to usage data of current customers. Importantly, we live in a marketplace of instant gratification. In every other industry, service providers are geared around providing very quick customer service turnaround. The inability of suppliers to have timely and reliable access to their customer's usage data is a barrier on the ability of suppliers' to satisfy the demands of customers. Such a result would occur with the implementation of SU-MR. This is not reasonable nor in the public interest.

For these reasons, RESA shares the concerns set forth by NRG about the focus of the EDEWG report on the SU-MR because it is a manual process that could only provide customer IU data one account at a time. As NRG Retail notes, "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."

While RESA recognizes that significant time and energy has been dedicated to developing the standards for the SU-MR process, the reality is that the SU-MR process is not one that has any value to EGSs and will not be used. Therefore, RESA urges the Commission to take into serious consideration whether moving forward to implement SU-MR is an efficient use of the utilities' time and resources and a worthwhile cost to impose on ratepayers. Because RESA believes that

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<sup>8</sup> See RESA Main Brief dated May 2, 2012 at 92-93 in the *FirstEnergy DSP II Proceeding* (The availability of such a powerful web-based tool enables an EGS to offer potential customers a "one stop" shopping website where a price can be immediately offered and accepted. This becomes possible because the customer enters relevant information at the EGS's website which is then matched with the utility's usage data from the utility's website, and an instant, custom price for that particular account can be displayed. Remaining on the EGS website with the price offer, the customer can then sign a contract and enroll with the EGS for service. Such customer conveniences make shopping a positive experience for the consumer and can be an effective way to encourage customers to shop. In addition, the immediate availability of relevant customer information can be used to notify the customer that he or she may not be eligible, for whatever reason, for an EGS's offer and can be immediately referred to the Commission's PowerSwitch website for information about other alternative suppliers. The more immediate, accurate and up-to-date the information, the better the price that can be offered to the customer and the less likelihood for errors because the customer can immediately sign up via the EGS website.)(*internal cites omitted*).

<sup>9</sup> *Petition of PECO Energy Company for Approval of its Smart Meter Technology and Installation Plan*, Docket No. M-2009-2123944, Comments of Retail Energy Supply Association dated May 17, 2010 at 1.

moving forward with SU-MR is not reasonable or likely to result in any significant benefit to customers, RESA strongly supports mandatory implementation of the StS approach which would require the EDCs to provide flat files to each EGS containing the 48 hour (or less) old IU data for all of the customers being served by the EGS (i.e. the “Active EGS Rolling 10-Day Solution”).<sup>10</sup> As detailed in its letter, NRG Retail has set forth a reasonable way in which this solution can be implemented and RESA agrees that its mandatory implementation is a much more reasonable way to achieve the goals established by the Commission for this process for the ultimate benefit of the consumers.

Thank you for your time and consideration of this important issue and do not hesitate to contact me if you have any questions or concerns.

Sincerely,



Deanne M. O'Dell

DMO/lww

cc: Office of Competitive Market Oversight (via email to ra-OCMO@pa.gov)

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<sup>10</sup> The Active EGS Rolling 10-Day Proposal is described on pp 24-25 in Appendix B of the EDEWG Report. An additional StS approach, “SOAP Web Service,” is also described in the EDEWG Report. However, the SOAP Web Service suffers from similar problems as the SU-MR. While SOAP Web Service would be automated, it is still a one account at a time request process that will only serve to unnecessarily delay access to the data and preclude innovative offers to customers. Therefore, RESA urges the Commission to focus instead on the Active EGS Rolling 10-Day Proposal.