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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 23rd 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,



Deanne M. O'Dell

DMO/lww
Enclosure

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March 23, 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:

On February 17, 2015, the Electronic Data Exchange Working Group (“EDEWG”) submitted its Pennsylvania Web Portal Working Group Solution Framework (“EDEWG Report”) to the Commission. The EDEWG Report is intended to comply with the Commission’s direction to develop a standardized solution for acquisition of interval usage data via a secure web-portal. While the Commission expected a shorter-term solution to offer 12 months of historical usage (“HIU”) data via a secure web platform and a longer-term solution would provide billing quality interval usage (“IU”) data within 24 to 48 hours of meter reads, the EDEWG Report defines the “minimal standards” for a manual portal framework,¹ i.e. the “Single User – Multiple Requests” (“SU-MR”), and discusses – but offers no consensus recommendation – regarding a long-term solution whereby the electric distribution companies (“EDCs”) would implement 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.² For the reasons further explained herein, Direct Energy urges the Commission to reject the SU-MR proposal and require the EDCs to implement the StS approach whereby the EDCs will 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”).³

¹ Importantly, not all participants agreed that the SU-MR should be the “chosen” portal framework. *See* EDEWG Report, Appendix C.

² EDEWG Web Portal Working Group Solution Framework at 2 and Appendix B at 20.

³ The Active EGS Rolling 10-Day Proposal is described on pp 24-25 in Appendix B of the EDEWG Report.

Consistent with the March 13, 2015 letter filed by NRG Retail Affiliates (“NRG Retail”), the March 20, 2015 letter filed by the Retail Energy Supply Association (“RESA”), Direct Energy agrees 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. Rather than spending any more time and energy on a process that is not useful and will not be utilized, Direct Energy urges the Commission require the EDCs to focus on a solution that would be useful.

Direct Energy, the largest competitive retail energy supplier in North America, is a licensed supplier in Pennsylvania and offers a broad range of competitive services and products to Pennsylvanians. Importantly, because of the ability of Direct Energy to receive usage data in other markets, the competitive products that Direct Energy can offer in those markets allow for the introduction of innovative products and services, not found in other jurisdictions. For example, Direct Energy offers Power-To-Go® electricity plans in Texas which provides customers real-time information about their usage. With this timely data, customers can better manage how much they want to pay and how often they would like to pay, based on awareness of how much electricity is used. Innovative, real-time products like this are available only where suppliers are able to access usage data of customers. Here, the Commission has an opportunity to move one step closer to realizing this potential for Pennsylvania consumers. To do so, however, Direct Energy respectfully recommends that the Commission reject implementation of SU-MR and require the EDCs to move forward with Active EGS Rolling 10-Day Solution.

Thus, Direct Energy supports the specific recommendations set forth in the NRG Retail letter about how to move forward regarding the EDEWG Report.

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)