

May 18, 2015

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
400 North Street
Keystone Building
2nd Floor, Room N201
Harrisburg, Pennsylvania 17120

Re: Docket M-2009-2092655 - Electronic Data Exchange Working Group (EDEWG) – Web Portal Working Group Report – Comments on Tentative Order dated April 23, 2015

Dear Secretary Chiavetta:

On April 23, 2015, the Public Utility Commission (“Commission”) issued a Tentative Order to address the implementation of data solutions by electric distribution companies to provide historical interval usage (HIU) and billing quality interval usage data (BQIU). As an electric generation supplier (EGS) serving customers in Pennsylvania, WGL Energy Services appreciates the opportunity to provide feedback on this Tentative Order.

The Commission has wisely recognized the importance of providing the System-to-System (StS) functionality in order to “maximize the benefits of smart meter technology.” WGL Energy offers two comments on this implementation.

- 1) This solution should require the EDCs to implement the “Active EGS” option as this is the most efficient way to provide access to the usage data for large numbers of accounts. The SOAP option is more difficult to scale for many accounts.
- 2) The implementation date for the StS solution should be accelerated in order to support the development of innovative products and services for Pennsylvania consumers. The existing EDC web portals can provide the channel to deliver this data in a flat file format and avoid the time and expense of development that will be required for the Single User – Multiple Requests (SU-MR) solution. The StS “Active EGS” solution should be implemented prior to the SU-MR solution, and the target date for this StS implementation should be no later than six months from the date of the Commission’s Final Order.



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WGL Energy Services has had positive experience with the flat data files provided by the PHI Utilities and has begun providing an Energy Management Platform that allows customers to visualize and analyze their usage and glean insights into potential strategies for improving their utilization of electricity. We look forward to providing similar services to the Pennsylvania customers as soon as possible.

WGL Energy Services appreciates the opportunity to provide these comments. If there are any questions, you may contact me at 703-793-7562 or Phil Woodyard at 703-793-7560.

Sincerely,

Bernice K. McIntyre
Program Director, Regulatory Strategy
WGL Business Development and Non-utility Operations
WGL Energy Services, Inc.