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**VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
P.O. Box 3265  
Harrisburg, PA 17105-3265

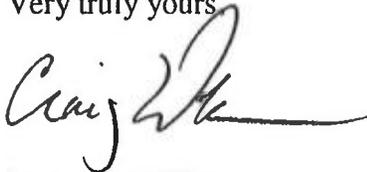
**Re: Submission of the Electronic Data Exchange Working Group's Web Portal  
Working Group's Solution Framework for Historical Interval Usage and Billing  
Quality Interval Usage - Docket No. M-2009-2092655**

Dear Secretary Chiavetta:

Enclosed please find **PECO Energy Company's Comments on the Commission's April 23, 2015 Tentative Order** in the above-referenced docket.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



W. Craig Williams

Enclosure

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Submission of the Electronic Data Exchange :  
Working Group’s Web Portal Working :  
Group’s Solution Framework for Historical : Docket No. M-2009-2092655  
Interval Usage and Billing Quality Interval :  
Usage :

**PECO ENERGY COMPANY’S COMMENTS ON THE  
COMMISSION’S APRIL 23, 2015 ORDER**

Pursuant to the April 23, 2015 Tentative Order (“Tentative Order”) entered by the Pennsylvania Public Utility Commission (the “Commission”) in the above-referenced docket, PECO Energy Company (“PECO” or the “Company”) hereby submits comments on the Commission’s proposals for a standardized solution for the acquisition of historical interval usage (“HIU”) and billing quality interval usage (“BQIU”) data. In particular, the Commission proposes that electric distribution companies (“EDCs”) with smart meters implement two options outlined in the Pennsylvania Web Portal Working Group (“WPWG”) Solution Framework (the “Framework”)<sup>1</sup>: (1) the Single User – Multiple Request (“SU-MR”) option, within eight months of the entry of a Final Order in this proceeding; and (2) the System-to-System (“StS”) functionality, within twelve months of a Final Order.

PECO fully supports standards to enable a customer to share usage data with third parties who have obtained the appropriate customer consent. To that end, PECO has worked diligently

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<sup>1</sup> See *Pennsylvania Web Portal Working Group Solution Framework*, submitted by the Electronic Data Exchange Working Group (“EDEWG”), Docket No. M-2009-2092655, received February 23, 2015.

to plan, design and implement the smart meter provisions of Act 129<sup>2</sup> since its passage in 2008 and has been a very active participant in EDEWG, including efforts to develop Smart Meter Data Exchange standards. PECO has also participated in WPWG since its inception and worked closely with EDEWG Leadership on developing the Framework.

PECO appreciates the Commission's efforts to provide direction regarding the proposed Framework solutions and shares Commissioner James H. Cawley's desire for efficient and effective solutions for sharing customer data. In these Comments, PECO requests additional clarity regarding third-party eligibility to utilize SU-MR and StS, proposes mechanisms to recover the costs of implementing the identified Framework proposals, and provides responses to the questions posed in the Statement of Commissioner Cawley accompanying the Tentative Order.

## **I. PECO'S COMMENTS**

### **A. Eligibility To Utilize SU-MR And StS**

#### **1. Third Party Eligibility And Enforcement Of Customer Data Protections**

In the Tentative Order, the Commission states that its proposal is intended to provide customer HIU and BQIU data to entities that have received customer consent for release of data, including electric generation suppliers ("EGSs") and conservation service providers / curtailment service providers ("CSPs").<sup>3</sup> However, the Framework solutions which the Commission proposes to implement were developed under the assumption that the only third-party to receive such data would be a Commission-licensed EGS.<sup>4</sup> As discussed below, the more limited scope of the Framework solutions was intended to ensure that the Commission would have jurisdiction

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<sup>2</sup> 66 Pa.C.S. § 2807(f).

<sup>3</sup> Tentative Order, p. 9.

<sup>4</sup> See Framework, p. 4, Section 2.1.1, Part c, Item i.

over third parties accessing and using this data. PECO requests clarification regarding the scope of third party eligibility to utilize the proposed SU-MR and StS solutions, the customer data protections that will apply to HIU and BQIU data, and how the Commission intends to enforce such protections against non-EGS third parties. This clarification is essential to EDCs so that they can properly design eligibility and intake processes for the Framework solutions.

The WPWG was very cognizant of customer data protection issues during the development of the Framework and recommended restricting third-party access to customer data to EGSs or entities serving as agents of an EGS. The WPWG also specifically stated that the use of the SU-MR solution by third parties not licensed as EGSs is outside the scope of the WPWG effort.<sup>5</sup> These limitations were based on previous Commission findings that Commission regulations pertaining to privacy of customer information at 52 Pa. Code § 54.8 are applicable to both EDCs and EGSs.<sup>6</sup> In addition, customer consent requirements have been streamlined between EDCs and EGSs so that an EDC is obligated to respond to Electronic Data Interchange (“EDI”)-based requests for electric historical usage without requiring the EGS to provide proof of authorization.<sup>7</sup> PECO adheres to this policy and responds to EGS requests via EDI for historical usage with the understanding that the EGS has customer consent to obtain data and that the EGS will be subject to Commission audit, at the Commission’s discretion, or appropriate enforcement action as necessary for any violations of the Commission’s regulations. The design of the Framework solutions reflects the responsibility of EGSs, not EDCs, to manage EGS receipt of appropriate customer authorization.

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<sup>5</sup> See Framework, p. 5, Section 2.1.1, Part c, Item iii.

<sup>6</sup> See, e.g., *Petition of PECO Energy Company for Approval of Smart Meter Technology Procurement and Installation Plan*, Docket No. M-2009-2123944 (Order entered June 3, 2010), p. 13.

<sup>7</sup> *Id.*

In the Final Order, the Commission should address the potential inconsistency between the third-party eligibility described in the Tentative Order and the applicability and enforceability of the Commission's customer data protections with respect to those parties. If the Commission determines that solution eligibility, as described in Section 2.1.1 of the Framework, requires expansion, it should address the applicability of customer protections to those additional parties and clarify the associated requirements for customer authorization. If EDCs will be required to manage proof of customer authorization for non-EGS parties, additional time will be required to revise the Framework solutions within the WPWG, and the costs of implementation as estimated in Section I.D.1 *infra*, will increase.

## **2. Customer Eligibility And Existing Customer Access Solutions**

The Framework solutions specifically exclude customers as users and PECO customers already have access to their own individual HIU and BQIU data via a web-based self-service functionality that is password-protected and also offers the capability to download usage data in Green Button format. Therefore, PECO intends to continue providing customer access in this manner and limit the scope of both SU-MR and StS solutions to eligible third parties. Should customer authorizations become a direct component of the processes for third-party access, PECO requests the flexibility to implement customer authorization capabilities within the infrastructure of the Company's existing customer self-service functionality.

PECO also will discontinue an existing website, the "Presentment Customer Usage" tool, which was originally implemented for commercial customers but used frequently by EGSs and other third parties.<sup>8</sup> As explained above, PECO customers have access to their usage data via

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<sup>8</sup> A description of the website can be found in the April 4, 2013 Secretarial Letter at Docket Nos. P-2011-2273650, P-2011-2273668, P-2011-2273669, and P-2011-2273670.

more recently implemented self-service web functionality. Third parties will have the ability to obtain the same data from the SU-MR solution proposed in the Tentative Order.

**B. “Bill Quality” Versus “Best Available” Data**

The Framework solutions are designed to provide access to HIU and BQIU data within 48 hours of daily meter reads. PECO believes the level of data quality required for BQIU should be clarified in the Final Order. Because the quality of data available within 48 hours will not be the same as verified billing data used in monthly billings, PECO submits that what the Commission describes as BQIU may be better described as “Best Available Interval Usage”, or “BAIU.”

In the Commission’s December 6, 2012 Final Order at this docket, the Commission adopted PECO’s definition of the term “bill quality” as “data that is sourced from an EDC’s meter data management system that has completed the process of being verified, estimated, and edited, in association with such systems.”<sup>9</sup> While this definition of “bill quality” remains appropriate, data that is available within 48 hours of a meter read has not fully completed PECO’s verification, estimation, and editing (“VEE”) processes and is not “billing quality.”<sup>10</sup> This is because PECO applies certain VEE rules upon receipt of the raw meter reads from its smart meters, but then applies additional rules at the time of billing the associated customer’s account. The latter step is necessary because VEE of raw meter reads typically only considers the reads obtained for a given day, while VEE at the time of billing evaluates these same readings over the entire billing period and ensures proper integration and estimation across each day of the billing period.

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<sup>9</sup> *Smart Meter Procurement and Installation*, Docket No. M-2009-20926755 (Final Order entered December 6, 2012), pp. 16-17.

<sup>10</sup> PECO notes that if BQIU is defined according to the “bill quality” definition adopted by the Commission, BQIU would be technically identical to HIU since HIU consists of usage as of customer billing.

Additionally, PECO notes that the existence and operation of a smart meter does not guarantee that actual readings will always be available within 48 hours of the usage date. For example, circumstances beyond the Company's control, such as power outage from storms, may prevent PECO from obtaining raw data from the meter within that timeframe. PECO has processes in place to re-attempt collection of actual reads, but even if such processes are successful, collection may occur after the 48-hour period has expired.

### **C. Cost Recovery**

The Tentative Order is silent with respect to how EDCs should recover the cost of implementing the Framework solutions. As with many retail market enhancements, cost recovery is not always one size fits all. PECO believes the EDCs should be allowed to recover costs through a base rate case, a non-bypassable surcharge or a retail markets enhancement charge depending upon the EDC's specific circumstances.

### **D. Responses To Commission Cawley's Questions**

#### **1. What are the implementation costs for the SU-MR option, as well as the StS solution?**

PECO currently estimates the total implementation cost of the SU-MR option to be approximately \$1.8 million with incremental solution maintenance fees of approximately \$360,000 annually. PECO currently estimates the total implementation cost of the StS functionality to be approximately \$2 million with incremental solution maintenance fees of approximately \$400,000 annually.

These estimates are based on two assumptions: (1) the implementation of the Framework solutions would be consistent with the standards in the Framework (e.g., third party access would be restricted to EGSs or their agents); and (2) the Commission would provide at least fourteen months to implement SU-MR and eighteen months to implement StS after issuance of a final

order adopting the Framework solutions. In the event that the Commission establishes the shorter timeframes proposed in the Tentative Order, PECO's overall implementation costs will increase by approximately 30-50% due to the volume and additional complexity of actions that would have to be completed in parallel. Therefore, assuming that all other factors remain unchanged, including the Commission's proposed implementation sequence (SU-MR solution first), PECO proposes to implement the SU-MR solution within fourteen months of the date of the Final Order and the StS solutions within eighteen months of the date of the Final Order.

In the event that standards are revised or newly applicable standards are developed prior to implementation, PECO would need to re-evaluate both the implementation cost and the Company's ability to complete the full scope of implementation within the prescribed timeframes. PECO assumes all changes to the Framework solutions will follow EDEWG change control processes.

2. **Assuming the StS functionality is to be implemented, what are the incremental costs of the SU-MR option? In other words, are the implementation costs for the SU-MR solution reduced if the StS solution is implemented?**

The work required by PECO to implement both solutions is the same regardless of the sequence in which the functionality is implemented. PECO does not expect reduced implementation costs for the SU-MR option as a result of initially implementing the StS solution.

3. **Can the Green Button solution serve as an effective substitute for the SU-MR option?**

PECO believes that the SU-MR option and the Green Button standard are not mutually exclusive and that Green Button can complement the SU-MR option. PECO has been a strong supporter of Green Button and, as discussed earlier in these Comments, already provides customers with access to the Green Button "Download My Data" option via a web-based self-service functionality. Although Green Button is not part of the minimum standards for the SU-

MR option, PECO believes that it would be reasonable and achievable for the Company to integrate a download option into the SU-MR solution.

**4. If the Green Button solution is currently not an effective substitute, can its functionality or access limits be modified, and at what cost, to make it suitable for this purpose?**

Another Green Button functionality, known as “Connect My Data,” could be integrated into the StS solution. During WPWG discussions, PECO introduced this functionality as a potential minimum standard for StS. As noted in the Framework,<sup>11</sup> for various reasons, use of Green Button did not receive enough stakeholder support for the WPWG to include it in the Framework as a consensus consideration. The Company intends to consider integrating this functionality into its StS solution and notes that the “Connect My Data” functionality is growing in popularity outside of Pennsylvania. Whether the Company decides to integrate the functionality will depend in part upon the Commission’s clarifications regarding third party eligibility and the management of proof of customer authorization.

**5. Is it practical for all system users to use the StS solution, or is this more costly and burdensome than the SU-MR solution for lower data volume users?**

Consistent with the Commission’s recommendations in the Tentative Order, PECO believes that both the SU-MR and the StS solutions have their place in Pennsylvania’s energy choice marketplace. While the cost and burden of each solution will vary for each user, the StS solution (with or without incorporating Green Button) will require more IT capabilities than SU-MR to retrieve and process customer data. For instance, requesting third parties intending to use the “By Request” simple object access protocol (“SOAP”) service that is part of StS must “develop and maintain the code necessary” to use it.<sup>12</sup> This would require technical software

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<sup>11</sup> See Framework, p. 22.

<sup>12</sup> See Framework, p. 27.

development effort on the part of entities electing to use this service. Therefore, offering the SU-MR solution alongside StS may add value for third parties that lack either the necessary IT capabilities or the resources to obtain those capabilities.

**6. What other standards are appropriate for this working group to establish in order to assure that a consistent solution is developed across all EDCs?**

To properly address this question, PECO believes that the Commission should clarify the degree of consistency that is expected regarding the Framework solutions. As a general matter, PECO believes that any additional standards should provide sufficient flexibility such that EDCs can develop solutions within the context of applicable enterprise-wide policies, processes, and procedures. This would be consistent with the existing Framework solutions, which are designed as minimum standards upon which an EDC can overlay additional processes and requirements.

Providing such flexibility would also be consistent with pre-existing EDI standards maintained by EDEWG regarding electric choice that have endured for over a decade. These standards allow for various EDC customizations while maintaining the overall consistency of business rules, data exchange format, testing expectations, and change control. The balance achieved between consistency and EDC flexibility is due in no small part to the continued involvement of market participant subject matter experts at a technical level, from not only the EDCs and EGSs but also from service providers, billing agents, and others representing those organizations.

PECO encourages the Commission to actively partner with EDEWG Leadership on any further standards development and believes that stakeholder involvement will continue to be of great importance. Participation in EDEWG up to this point has been primarily EDCs, EGSs, and related service providers. If the Commission intends to use SU-MR and StS to provide data access to a wider range of third parties, PECO believes that EDEWG must engage additional

stakeholders, such as CSPs, in any revisions or additions to the Framework standards. In addition, PECO notes that any standards-related discussions at a technical level will require each organization to actively engage appropriate technical subject matter experts as well as facilitators with sufficient technical and non-technical background capable of driving associated discussions to the stated goals.

## II. CONCLUSION

PECO appreciates the opportunity to comment on the Tentative Order and requests that the Commission consider and adopt the foregoing recommendations in developing the Final Order. PECO looks forward to continuing to work with the Commission and EDEWG to develop robust data sharing solutions to benefit customers.

Respectfully submitted,



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May 26, 2015

*For PECO Energy Company*