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May 26, 2015

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
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 Use; Docket No. M-2009-2092655

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Comments of the Retail Energy Supply Association's ("RESA") with regard to the above-referenced matter. If you have any questions regarding this filing, please contact me at your convenience.

Sincerely,



Deanne M. O'Dell

DMO/jls  
Enclosure

cc: Lee Yalcin ([lyalcin@pa.gov](mailto:lyalcin@pa.gov))  
Jeff McCracken ([jmccracken@pa.gov](mailto:jmccracken@pa.gov))  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**COMMENTS OF  
THE RETAIL ENERGY SUPPLY ASSOCIATION  
TO TENTATIVE ORDER ENTERED APRIL 23, 2015**

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**I. INTRODUCTION**

In its December 5, 2012 Order at this docket, the Commission directed the Electronic Data Exchange Working Group ("EDEWG") to develop a standardized solution for acquisition of interval usage data via a secure web-portal through a shorter-term solution which would offer 12 months of historical usage ("HIU") data via a secure web platform and a longer-term solution that would provide billing quality interval usage ("IU") data within 24 to 48 hours of meter reads. In compliance with this direct, EDEWG filed a Pennsylvania Web Portal Working Group Solution Framework ("EDEWG Report") on February 17, 2015.

The EDEWG Report defines the "minimal standards" for the "chosen" manual portal framework,<sup>1</sup> i.e. the "Single User – Multiple Requests" ("SU-MR"), while leaving any related items not specifically addressed at the discretion of the individual electric distribution companies ("EDCs").<sup>2</sup> The EDEWG Report notes that representatives expressed a long-term preference for EDC implementation of a System-To-System ("StS") approach for accessing IU data that allows

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<sup>1</sup> Importantly, not all participants agreed that the SU-MR should be the "chosen" portal framework. See EDEWG Report, Appendix C.

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

an authorized user's IT systems to communicate directly with the secure web portal system of the EDC.<sup>3</sup> While information about potential StS approaches was included with the EDEWG 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.

Following the filing of the EDEWG Report, the Retail Energy Supply Association ("RESA")<sup>4</sup> and several other electric generation suppliers ("EGSs") filed letters with the Commission. These letters generally advocated 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. RESA specifically recommended that the Commission reject the SU-MR approach and, instead, require 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 StS Solution").<sup>5</sup>

After consideration of the EDEWG Report and the letters, the Commission entered its Tentative Order on April 23, 2015 and invited interested parties to submit comments within 30 days. In its Tentative Order, the Commission tentatively concludes that the SU-MR option may not be sufficient or efficient "for large-scale suppliers" but that alone does not warrant rejection

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<sup>3</sup> EDEWG Report, Appendix B at 20.

<sup>4</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>5</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).

since the Commission tentatively concludes that it may still be useful to conservation service providers (“CSPs”) and smaller EGSs. Therefore, the Commission proposes that the SU-MR option be implemented within 8 months of the entry date of the final order.<sup>6</sup> However, the Commission does agree that an StS methodology should be the end result and proposes that the StS option be included in system upgrades within 12 months of the entry date of the final order.<sup>7</sup> The Commission invited stakeholder feedback on its proposals.

As explained further below, RESA urges the Commission to abandon implementation of the manual, inefficient and not likely to be used SU-MR process. Rather, the Commission should direct the EDCs to implement the Active EGS Rolling 10-Day StS Solution which would utilize existing supplier portals and can be implemented quickly. To the extent the Commission continues to believe that some entities may find value in the SU-MR process, then RESA would urge the Commission to direct implementation of the SU-MR process only after Active EGS Rolling 10-Day StS Solution is implemented.

## **II. COMMENTS**

### **A. Implementation of SU-MR**

As noted in RESA’s March 20, 2015 letter, RESA is a strong proponent of the ability of suppliers to be able to receive timely and reliable access to near real time usage data and believes that such access is particularly essential in view of the fact that we live in a marketplace of instant gratification. Unfortunately, the SU-MR process is inadequate to satisfy these requirements. This is because it is a manual process which requires users to upload requests one at a time. As such, the SU-MR process cannot be automated and is not scalable to enable an

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<sup>6</sup> Tentative Order at 9, 12.

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

EGS to request data for thousands of customers each day. As aptly stated by NRG Retail in its March 13, 2015 letter, “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.” Because of these realities, the SU-MR process does not have any value to the EGSs and will not be utilized. For that reason, RESA recommends that the Commission abandon its tentative conclusion on this issue and instead direct the EDCs to focus on implementation of StS.

## **B. Implementation of StS**

In its Tentative Order the Commission rightly agrees that an StS methodology should be the end result and proposes that the StS option be included in system upgrades within 12 months of the entry date of the final order.<sup>8</sup> Implementation of StS would enable an authorized user’s IT systems to communicate directly with the secure web portal system of the EDC. As such customer data would be provided in an efficient and timely fashion to EGSs which would support the ability of the market to develop innovative products for the benefit of consumers. To that end, RESA supports directing the EDCs to focus on implementation of StS in lieu of the SU-MR process.

While the Commission tentatively proposes to require EDCs to include an StS methodology, it does not provide specific direction regarding the StS methodology that should be implemented. The EDEWG Report discusses but offers no consensus recommendation regarding the StS approach.<sup>9</sup> For this reason, RESA urges the Commission to clarify in its Final Order that the StS approach that EDCs are required to implement is the Active EGS Rolling 10-

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<sup>8</sup> *Id.* at 9-10.

<sup>9</sup> EDEWG Report at 2 and Appendix B at 20.

Day StS Solution.<sup>10</sup> Pursuant to this approach, the EDCs would be required 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. Through the Active EGS Rolling 10-Day StS Solution, data files can be provided to EGSs via the EDCs' existing secure supplier portals. The EDCs' supplier portals are already in place and well utilized by EGSs. Allowing EGSs to get this data from the existing web portals would be simple and easy to implement. Importantly, it could also be implemented far more quickly than the manual and less useful SU-MR process and would have far more significant and immediate positive effects for the marketplace.

RESA does not support the other StS approach, "SOAP Web Service," which is described in the EDEWG Report as it 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 requiring the EDCs to immediately implement the Active EGS Rolling 10-Day StS Solution.

### **C. Implementation of Both SM-UR and StS**

To the extent the Commission continues to believe implementation of SM-UR may be worthwhile based on its expressed concern that smaller EGSs and/or CSPs may benefit from it, RESA recommends that such implementation occur only after the Active EGS Rolling 10-Day StS Solution is in place. This is based on a recognition of the need to prioritize system changes and an evaluation of the costs and benefits. As noted above, the Active EGS Rolling 10-Day StS Solution can be quickly and cost effectively implemented using existing systems. As such, there really is no reason to delay the implementation of this solution until after implementation of SM-

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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.

UR. Rather, to the extent the Commission still wants SM-UR implemented, it should prioritize implementation of the Active EGS Rolling 10-Day StS Solution over implementation of SM-UR.

### III. CONCLUSION

RESA urges the Commission to abandon implementation of the manual, inefficient and not likely to be used SU-MR process. Rather, the Commission should direct the EDCs to implement the Active EGS Rolling 10-Day StS Solution which would utilize existing supplier portals and can be implemented quickly. To the extent the Commission continues to believe that some entities may find value in the SU-MR process, then RESA would urge the Commission to direct implementation of the SU-MR process only after Active EGS Rolling 10-Day StS Solution is implemented.

Respectfully submitted,



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