



May 22, 2015

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Dear Ms. Chiavetta:

The Electronic Data Exchange Working Group ("EDEWG") submits the following comments, in response to the Pennsylvania Public Utility Commission ("Commission") Tentative Order regarding the 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 under the Smart Meter Procurement and Installation Implementation Order issued December 5, 2012 (Docket No. M-2009-2092655).

EDEWG Leadership respectfully submits the below response comments to answer the following questions put forth in the Statement of Commissioner James H. Cawley.

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

The EDEWG Leadership respectfully defers discussion of implementation costs to the EDC and EGS stakeholders.

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 EDEWG Leadership respectfully defers discussion of implementation costs to the EDC and EGS stakeholders.

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

The Green Button solution was reviewed by the Web Portal Working Group (WPWG) and was not deemed effective due to the limited amount of EDCs across the nation to fully implement its use. Another concern was the level of information provided within the Green Button XML standard. The WPWG believed for historical data, all existing data elements in the current EDI 867 Historical

Interval Usage transaction should be provided in the web based solution. For interval billing data, the same held true that any web based solution would at a minimum include all of the data elements currently passed in the EDI 867 Interval Usage transaction set.

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?

The Green Button solution was not considered to be used in a modified state. In order to modify the structure of the Green Button's XML data standard(s), data change requests must be made, discussed and vetted by various governing bodies. The process to do so would require resource commitments to coordinate such change as well as adherence to those governing bodies' ratification and publication timelines. By pursuing such efforts, the WPWG deliverables timelines risked impact without the guarantee of the governing bodies approving changes to the Green Button standard(s). The WPWG recommended the EDEWG Leadership consider reintroducing this format into future discussions based on maturity and a wider adoption rate across the industry.

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 volume users?

No. The StS solution is likely to be leveraged by the well-established EGS and Broker companies. However those many of those same companies may prefer to utilize the current EDI solution since EDI is already supported by their systems. The lower data volume users would probably prefer SU-MR option due to lower costs to support.

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?

The WPWG outlined two proposals for StS consideration within the Solution Framework document. Proposal #1 (Active EGS Rolling 10-Day CSV file Format) only supports the Bill Quality Interval Usage (BQIU) and does not provide the minimum 12 months of customer Historical Interval Usage (HIU). In the event the StS option is mandatory, EDEWG must agree to and publish the XML/WSDL data structure as an EDEWG standard before EDC development may begin. The data structure standard was not finalized within the proposed framework as the StS consideration was not agreed upon to be mandatory. To deliver, EDEWG Leadership recommends reconvening the WPWG with mandatory EDC participation to develop the XML /WSDL SOAP structure and present to EDEWG and staff a final standard. Due to many EDEWG and WPWG participants being volunteers, EDEWG Leadership estimates this process 4 to 6 months to complete.

See #1 below, Access Management to the portals will need to be addressed as the WPWG solution framework does not provide access to anyone except licensed EGS and Broker/Markets.

EDEWG Leadership general comments/questions:

On p.9 of the Tentative Order, the Commission mentions "all stakeholders, including, but not limited to, consumers, EDCs, licensed EGSs, CSPs and other entities who have obtained customer consent regarding the release of data." On p.11, "Because of the increasing deployment of the smart meter

technology over the next few years, we believe it appropriate for the EDCs to incorporate in that implementation the functionality necessary to provide customers, EGSs, CSPs and other entities who have acquired customer consent with the HIU and BQIU data garnered using smart meter technology.”

The WPWG solution framework (2.1.2) only addresses access to licensed EGSs and Broker/Marketers because of consumer privacy concerns and data access liability with regard to EDC exposure, EDEWG Leadership requests the Commission to clarify expanded data access requirements. Should the PUC mandate the expanded data access for all Stakeholders, EDEWG Leadership recommends we reconvene the WPWG to define the increased scope. Due to the variances in data security and privacy policies across the EDCs, EDEWG Leadership estimates this process would take 4 to 6 months to complete.

EDEWG Leadership appreciates this opportunity to provide comments and continues our commitment in the development of the Commonwealth’s retail markets for the benefit of Pennsylvania’s consumers.
Sincerely,



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Constellation (An Exelon Company)



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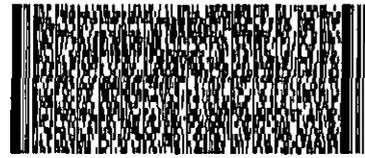


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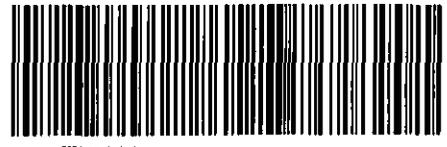
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