|  |  |  |
| --- | --- | --- |
|  |  **PENNSYLVANIA****PUBLIC UTILITY COMMISSION****Harrisburg, PA 17105-3265** |  |
|  |  |  |

|  |  |
| --- | --- |
|  | Public Meeting held November 5, 2015 |
| Commissioners Present: |  |

|  |
| --- |
|  Gladys M. Brown, Chairman |
|  John F. Coleman, Jr., Vice Chairman Pamela A. WitmerRobert F. Powelson |
| Andrew G. Place |
|   |
|  |
| 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 Data; Petition for Clarification and/or Reconsideration of the NRG Retail Affiliates | M-2009-2092655 |

# ORDER

**BY THE COMMISSION:**

 Before the Pennsylvania Public Utility Commission (Commission) is the Petition of the NRG Retail Affiliates[[1]](#footnote-1) (NRG) for Clarification and/or Reconsideration of the Commission’s September 3, 2015 Final Order (Petition or Petition for Reconsideration). In this Commission’s September 3, 2015 Final Order (Final Order), we directed the electric distribution companies[[2]](#footnote-2) (EDCs) to implement, within twelve months of the entry date of the Final Order, the Single User – Multiple Requests (SU-MR) option outlined in the Electronic Data Exchange Working Group’s (EDEWG) *Pennsylvania Web Portal Working Group Solution Framework*[[3]](#footnote-3) (Framework) and, within fourteen months of the entry date of the Final Order, the System-to-System (StS) functionality outlined in the Framework. We also directed EDEWG to reconvene the Web Portal Working Group (WPWG), with mandatory EDC participation, in order to develop (but not implement) standards for a uniform StS functionality that must be submitted to the Commission, for its review and approval, within six months of the entry date of the Final Order.

 On September 18, 2015, NRG submitted its Petition for Reconsideration. On October 1, 2015, the Commission granted NRG’s Petition for Reconsideration, pending further review of, and consideration on, the merits. Through this Order, we rule on the merits and deny the Petition for Reconsideration.

**BACKGROUND**

 In our *Smart Meter Procurement and Installation Final Order,* at Docket No. M-2009-2092655 (Order entered December 6, 2012) (hereinafter Dec. 2012 Final Order), we directed EDEWG to convene a WPWG to develop standardized solutions for third-party[[4]](#footnote-4) acquisition of a customer’s historical interval usage (HIU) and billing quality interval use (BQIU) data via an EDC-provided, secure web portal. Dec. 2012 Final Order at 13-14. The Dec. 2012 Final Order required EDEWG to complete its development standards for the HIU solution by March 1, 2014, with the completion of its development standards for the BQIU solution by March 1, 2015. The Order only required the completion of the standards by these dates. *Id.* at 14.

 The EDEWG Leadership (Leadership), with the full support of the WPWG membership, filed on February 4, 2014, a request that the Commission modify the scope of the proposal so that both the HIU and BQIU standards could be filed no later than March 1, 2015.[[5]](#footnote-5) The WPWG asserted that many of the utilized processes, data and technology elements common to both required standards would be more efficiently synergized in generating these standards. This request was granted via a Secretarial Letter dated April 17, 2014, at the aforementioned docket.

 On February 17, 2015, Leadership filed the Solution Framework. Leadership affirmed that this document outlined the standards for a secure web portal solution that would permit third parties, such as electric generation suppliers (EGSs) and Act 129 conservation service providers (CSPs),[[6]](#footnote-6) to acquire both HIU and BQIU data within 48 hours of daily meter reads. Leadership further asserted that the document was a group consensus regarding the minimally-required standards for the required secure web portals.[[7]](#footnote-7)

 Leadership maintained that the only non-consensus item from the WPWG was determining whether the implementation of an StS solution by the EDCs should be mandatory or optional. In this regard, Leadership requested that the Commission resolve this issue, as well as provide guidance for the implementation and timing of the consensus items.[[8]](#footnote-8)

 In the Framework, the WPWG provided an overall request-response portal framework, with three basic options from which to choose:

1. **Single User - Single Request (SU-SR).** A user-based platform allowing for an authorized user to manually log into the portal, request, and receive data for one individual account at a time via the portal’s user interface. The results could be rendered within the web portal interface itself or exported to the user in a predefined file format.
2. **Single User - Multiple Requests (SU-MR).** Similar to SU-SR, except that the authorized user logging into the portal may submit and receive data for more than one account number as part of a single request.
3. **System-to-System (StS)** – Initially conceived as a platform allowing an authorized user’s information technology (IT) systems to communicate directly with the web portal system of the EDC without requiring a user to manually log into the web portal itself and leverage the user interface. For instance, this could involve the use of File Transfer Protocol, aka “FTP,” or web services to transmit and satisfy requests.[[9]](#footnote-9)

After discussion, the WPWG agreed to focus on the SU-MR structure as the minimum required standard on which the deliverables should focus. However, some participants in later WPWG meetings voiced concerns regarding this approach and indicated a long-term preference for implementation of the StS structure.[[10]](#footnote-10)

EDEWG requested that the Commission approve the Solution Framework; provide guidance regarding its expectations for implementation of the solutions as part of smart meter implementation; and make a determination regarding the StS non-consensus issue.[[11]](#footnote-11)

 In our *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* Tentative Order*,* at Docket No. M-2009-2092655 (Order entered April 23, 2015) (hereinafter the Tentative Order), we proposed that the EDCs implement the SU-MR option within eight months of the entry date of a Final Order in this proceeding and to implement a mandatory StS functionality within 12 months of the date of the Final Order. Furthermore, the Statement of Commissioner James H. Cawley was placed into the record, asking market participants to provide responses to six specific questions posed to them. Comments were due within 30 days of the entry date of the Tentative Order.

The following parties submitted comments to the Tentative Order: Direct Energy (DE); NRG Retail Affiliates, consisting of Reliant Northeast LLC d/b/a NRG Home, Green Mountain Energy Company and Energy Plus Holdings, LLC (collectively, NRG); the Retail Energy Supply Association (RESA); WGL Energy Services, Inc. (WGL); Energy Association of Pennsylvania (EAP); the Mission:data Coalition (Mission:data); the Industrial Energy Consumers of Pennsylvania, Met-Ed Industrial Users Group, Penelec Industrial Customer Alliance, Penn Power Users Groups, Philadelphia Area Industrial Energy Users Group, PP&L Industrial Customer Alliance, and West Penn Power Industrial Intervenors (collectively, IECPA); Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company (collectively, FE); PECO Energy Company (PECO); Duquesne Light Company (DUQ); PPL Electric Utilities Corporation (PPL); and the EDEWG Leadership (Leadership).[[12]](#footnote-12)

On September 3, 2015, the Final Order directed those EDCs with smart meter requirements to implement, within twelve months of the entry date of the Final Order, the SU-MR option outlined in the Framework and, within fourteen months of the entry date of the Final Order, the StS functionality outlined in the Framework. We also directed EDEWG to reconvene the WPWG, with mandatory EDC participation, in order to develop (but not implement) standards for a uniform StS functionality. The WPWG was required to submit to the Commission, for its review and approval, its recommendations within six months of the entry date of the Final Order. The Commission would then provide further direction to the EDCs regarding the implementation of the StS functionality, as well as the potential recovery of costs.

On September 18, 2015, NRG filed its Petition for Reconsideration seeking clarification and/or reconsideration of specific parts of the Final Order. DE, WGL, and RESA (collectively, the Supporters) all filed Answers in Support of NRG’s Petition for Reconsideration. PECO, PPL, FE, and DUQ (collectively, the Utilities) all filed Answers to NRG’s Petition for Reconsideration requesting that the Petition be denied.[[13]](#footnote-13) On October 1, 2015, the Commission granted NRG’s Petition for Reconsideration, pending further review of, and consideration on, the merits.

**LEGAL STANDARD**

A petitioner may file for reconsideration seeking rescission or amendment of a final Commission order pursuant to Section 703 of the Public Utility Code. *See* 66 Pa. C.S. § 703(g); *see* 52 Pa. Code § 5.572 (must file petition within 15 days after Commission order is entered). Answers to a petition for reconsideration must be filed within ten days after service of the petition. 52 Pa. Code § 5.572(e).

Petitions for reconsideration of a final agency order may only be granted judiciously and under appropriate circumstances because those petitions seek to disturb final agency orders. *City of Pittsburgh v. Pa. Dep’t of Transp.*, 416 A.2d 461, 465 (Pa. 1980). In deciding whether to deny reconsideration, the Commission considers whether the petitioner has presented new evidence, changed circumstances, or previously unconsidered law. *J.A.M. Cab Co. v. Pa. PUC*, 572 A.2d 1317, 1318 (Pa. Cmwlth. 1990). A successful Petition for Reconsideration will convince the Commission to exercise its discretion to amend its prior final order by raising new or novel arguments not previously heard or considerations which were overlooked or not addressed by the Commission. *See Duick v. Pa. Gas & Water Co.*, 56 Pa. P.U.C. 553 (1982).

**DISCUSSION**

 In its Petition for Reconsideration, NRG requested reconsideration of the following two issues:

1. That the Commission should require EDCs to implement the “Active EGS” Rolling 10-Day Solution (Active EGS Solution) from the Framework, not the Simple Object Access Protocol (SOAP) Solution. NRG Petition at 1, 7-8.
2. That an unfair playing field between the EDCs and EGSs exists and that this disparity is so egregious it requires the implementation of the StS solution by December 31, 2015. *Id.* at 2-4.
3. **Active EGS Solution**
	1. **Petition and Comments**

In its Petition for Reconsideration, NRG alleges that the Final Order fails to reconcile the data inequity between EGSs and CSPs because it only orders the implementation of a single, uniform non-scalable and inefficient process (“By Request” SOAP Web Service) for BQIU and HIU. NRG Petition at 3. NRG further elaborates that the only StS process outlined in the EDEWG Report is the SOAP Web Service, as the Active EGS Solution uses a “provide-and-park” approach. *Id*. at 16 and 19. NRG also claims that the Active EGS Solution is scalable while the SOAP Solution is not. *Id.* at 1, 3-4, 7- 9, 15-16, 18-20.

The Utilities, however, disagree with NRG’s assessment of the Final Order. They point out that the Final Order does not dictate the implementation of the SOAP Solution as the StS Solution, and does, in fact, allow for the Active EGS Solution to be considered as a valid solution. DUQ Comments at 8; PECO Comments at 3; PPL Comments at 5-7. Furthermore, PPL alleges that NRG’s Petition for Reconsideration attempts to dodge the issue of ripeness by mischaracterizing the Active EGS Solution as being “not an StS process.” PPL Comments at 8.

* 1. **Resolution**

NRG’s assertion that the Active EGS Solution is not an StS solution is confusing. Throughout both the Tentative Order and the Final Order, the Commission referred to the Active EGS Solution as an StS solution, without receiving any comments from stakeholders stating that this may be incorrect. Furthermore, the Commission stated the following in its Final Order:

When considering an StS Option, any solution should be designed to scale efficiently with the volume of information from any increases in the number of smart meters or any additional deployments, such as the **Batch CSV file solution provided in the Framework**.

(emphasis added) (Final Order at 18).

The Framework utilizes the term “Batch CSV file solution” as another term for the Active EGS Solution. Framework at 24. Likewise, in its own comments to the Tentative Order, NRG also claimed that there were two separate and distinct StS solutions: the Active EGS Solution and the SOAP Solution. NRG Tentative Order Comments at 5.

 In addition, NRG appears to have agreed that Batch CSV file formatting is consistent with the Active EGS Solution as NRG’s comments to the Tentative Order include a request that, should the Commission direct the EDCs to implement the Active EGS Solution, the Batch CSV file formatting should include standardized headings across all EDCs for ease of use. NRG Tentative Order Comments at 10. Therefore, based on its own comments to this Commission, NRG appears to have envisioned that the Active EGS Solution *is*, in fact, an StS option and that Batch CSV file formatting is a part of the Active EGS Solution. NRG’s present claim[[14]](#footnote-14) that the Active EGS Solution is not an StS option is in direct conflict with comments it had previously provided to this Commission. *See* NRG Tentative Order Comments. Additionally, in the Final Order, the Commission only mentioned the SOAP Solution once, when we referenced the comments of the EDEWG Leadership, and never mandated that it (or any other specific StS solution) be adopted. Final Order at 17.

In order to provide clarification, we will elaborate upon our intent with regard to the WPWG and our direction to that group. We revived the WPWG as a venue to determine the most appropriate StS solution going forward. We will rely on the expertise of the WPWG to recommend appropriate standards for an StS solution which will be scalable and permit the secure transfer of large data files. In view of the expertise of the WPWG, we will not mandate any specific StS solution at this time. We emphasize again that any StS solution must be scalable and efficient. Based on these criteria, it is apparent that the SOAP solution, by itself, may not be a valid StS solution. Further, we reiterate that any standards proposed by the WPWG must come before this Commission for approval. We encourage NRG and all interested EGSs to become part of the WPWG and work with that group to develop the best StS solution that, when combined with the SU-MR and/or Electronic Data Interchange (EDI), empowers authorized stakeholders to take full advantage of timely access to HIU and BQIU data.

We remind all WPWG participants that this Commission recognizes the sensitivity of the data being provided through both the SU-MR and StS solutions and reiterate that any proposals from the WPWG should ensure that this data is being treated as highly confidential. As stated in our Final Order, both EGSs and EDCs will be held responsible for any misuse of customer information by both their own representatives, as well as by third party representatives, such as Act 129 CSPs, with which the EDCs and EGSs may have entered into a contract or otherwise established an agency relationship. Final Order at 14.

**2. Unfair Playing Field and Three Month Timeframe**

**a. Petition and Comments**

In its Petition for Reconsideration, NRG claims that EDCs are leveraging BQIU data for EDC-branded, value-added retail products and services while not providing this data to the EGSs. As argued by NRG, this gives the EDCs a significant competitive and unfair advantage. NRG Petition at 1 and 3. NRG argues that EDCs providing BQIU data to their contracted, Act 129 CSPs is inconsistent with the requirements of the Electricity Generation Customer Choice and Competition Act[[15]](#footnote-15) (Competition Act). *Id*. at 13. NRG further asserts that the critical first step in allowing EGSs to offer comparable products to Pennsylvania consumers is to require that EDCs provide EGSs access to all of their customers’ BQIU data through the efficient and scalable Active EGS Solution by December 31, 2015. *Id*. at 15-16.

FE contends that Act 129 mandates the EDCs to administer energy efficiency and conservation (EE&C) programs. FE Comments at 2-4. FE emphasizes that EDCs do not offer Act 129 EE&C programs to compete with EGSs, and points out that Section 2806.1, which Act 129 added to the Public Utility Code, does not prohibit EGSs from offering “value added products and services,” including EE&C measures. *Id*. at 5. FE also offers that it is simply not possible for EDCs to design, program, test, and implement an entirely new data access solution in the two months between the issuance of this Order and December 31, 2015. *Id*. at 4.

DUQ states that it does not provide its Act 129 CSPs with BQIU data via an Active EGS Solution or otherwise. DUQ Comments at 9. Furthermore, DUQ declares that it does not have the infrastructure in place to develop an Active EGS Solution to provide EGSs or CSPs with BQIU data by December 31, 2015. *Id*. at 10. Finally, DUQ avers that NRG’s Petition for Reconsideration is merely an attempt to bypass the broad stakeholder process and force its preferred solution, on its preferred timeline, on all involved parties. *Id*. at 8.

PPL charges that if NRG believed that immediate implementation of the Active EGS Solution was needed to prevent alleged discrimination in data access between Act 129 CSPs and EGSs, NRG could have and should have raised such arguments in its comments to the Tentative Order. PPL Comments at 6. PPL declares that, in fact, Act 129 CSPs have less access to data in its system than EGSs. PPL also maintains that in order to substantiate a claim of undue discrimination, the entity receiving undue preference must be similarly situated to the entity claiming discrimination, and that Act 129 CSPs and EGSs are different. *Id*. at 11. Finally, PPL asserts that it is not physically possible to implement the Active EGS Solution by December 31, 2015, and that time is needed to develop the different and additional privacy and security protocols for the StS solution. *Id*. at 9.

PECO states that Act 129 requires it to achieve increasing mandated targets for reduction of customer usage, without any profit and at the risk of substantial penalties if those targets are not achieved. PECO Comments at 5. PECO also notes that Act 129 requires the CSPs to have no affiliate relationship with the EDC and as such has no “brand” that benefits the EDCs at the expense of the EGSs. *Id*. at 6.

**b. Resolution**

The Commission agrees with the Utilities that the Act 129-mandated EE&C programs do not reflect marketplace offerings meant to compete with EGS products and services. The EDCs’ EE&C programs were mandated by Act 129 and through associated Commission Orders. No part of the Act 129 EE&C mandates restrict or unfairly discourage EGSs from offering their own energy efficiency or demand reduction programs and services. The mere existence of the Act 129-mandated EDC programs does not disallow an EGS from providing a similar program. Additionally, as noted by the Utilities, these are not “value-added services” for the utilities. The EDCs are required to offer these programs using certain budgetary levels and subjected to certain penalties for failure to meet targets. The EDCs receive no profit from these programs and, in the case of penalties, are unable to recover that money from ratepayers. As noted by the Utilities, this is a vastly different structure than that described by NRG. We agree that the Act 129 EE&C program initiatives were not intended as competitive products in the retail electricity market. The EDCs’ programs are not marketed as a competitive marketplace offering (for example, as an offer on the Commission’s PAPowerSwitch website) and, instead, are provided to all distribution customers, regardless of their status as shopping or non-shopping. This Commission has in the past and continues to strongly encourage EGSs to provide EE&C-related products and services to customers, but we find that NRG’s argument that the EDCs’ EE&C Programs prevent this is unfounded.

NRG’s argument that the EDCs are providing a level of data to Act 129 CSPs not afforded to EGSs is directly contradicted by comments filed in this proceeding. PPL argues that EGSs actually have easier and more detailed access to PPL customer data due to EGS use of its EDI, which provides both HIU and monthly and annual BQIU data, as well as the Supplier Portal. PPL’s Act 129 CSPs do not have access to EDI and, as a result, do not have access to HIU and monthly and annual BQIU data. PPL Comments at 10-11. Similarly, Duquesne notes that it does not provide BQIU data to the NRG-referenced Act 129 CSP, OPower, Inc. DUQ Comments at 9.

The Act 129 EE&C programs are not a new and novel concept. NRG was provided with the opportunity to provide comments to our Tentative Order in this proceeding and did, in fact, take advantage of the opportunity. However, NRG failed to raise this issue at that point even though Act 129, which included both the EE&C and the smart meter provisions, was signed into law October 15, 2008. NRG has had ample opportunity to raise concerns regarding the implementation of both the EE&C and smart meter provisions of Act 129 in other, more appropriate, proceedings. Also, as noted by the Utilities, Act 129 CSP contracts are competitively bid, in a competitively neutral manner and are subject to this Commission’s approval. In this context, we note that NRG could have and should have raised its concerns during the Commission’s review and approval of the EDCs’ EE&C Plans or in response to the approval of CSP contracts.

Moving to the implementation timeframe for an StS solution, NRG has not provided a sufficient basis in support of its proposed December 31, 2015 deadline. While NRG argues about an “unequal playing field” and notes that a quicker timeframe for implementation would help alleviate that issue, its proposed deadline is arbitrary. The Commission agrees with the EDCs’ and EDEWG Leadership’s comments referenced in our Final Order explaining that they have concerns related to privacy and security when implementing an StS solution. Final Order at 16-18. These concerns require time to evaluate any potential issues prior to launching software updates and/or new functionality. We do not believe it feasible for EDCs to fully implement an StS solution by the end of this calendar year while addressing all due concerns regarding customer confidentiality and data protection, as well as ensuring that the WPWG has been provided with the opportunity to discuss and develop the appropriate formatting for the StS solution. If the EGSs are interested in more standardized formatting and platforms to aid in ease of use across the EDC service territories, something which NRG advocated in its Tentative Order comments,[[16]](#footnote-16) two months’ time is insufficient.

Additionally, while this Commission provided a six-month deadline for the WPWG’s work, as well as a 14-month deadline for the EDCs’ implementation of an StS solution, those were maximum timeframes. We strongly encourage both the WPWG and the EDCs to consider and work towards earlier completion of these tasks, where feasible. We also note that the proposals resulting from the WPWG’s work will be subject to Commission review and, in the event that the WPWG cannot reach consensus, Commission direction will need to be provided.

**CONCLUSION**

As NRG has not demonstrated a change in factual circumstances or in the law or presented any new or novel arguments persuading us to modify the Final Order, we will deny NRG’s Petition to the extent that it requests reconsideration. Where appropriate, we have provided clarification which addresses most of NRG’s concerns relating to the type of data transfer platforms the Web Portal Working Group is to consider. The Commission recommends that NRG and interested EGSs join the WPWG meetings in order to assist in designing an appropriate StS solution.

**THEREFORE,**

**IT IS ORDERED:**

1. That the NRG Retail Affiliates’ request for clarification of the September 3, 2015 Final Order is granted, consistent with the terms of this Order.

2. That the NRG Retail Affiliates’ request for reconsideration of the September 3, 2015 Final Order is denied, consistent with the terms of this Order.

3. That electric distribution companies with smart meter requirements shall implement the Single User – Multiple Requests option by September 5, 2016.

4. That the electric distribution companies with smart meter requirements shall implement the System-to-System functionality by November 3, 2016.

5. That the Electronic Data Exchange Working Group shall reconvene the Web Portal Working Group. Participation in this Working Group is mandatory for all Electric Distribution Companies that have smart meter requirements. The Web Portal Working Group is tasked with developing, but not implementing, a proposed uniform standard for the System-to-System functionality of the web portals. The Web Portal Working Group shall submit to the Commission, for its review and approval, its proposed standard by March 3, 2016.

6. That this Order shall be served on all Electric Distribution Companies, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate and all parties at Docket No. M-2009-2092655.

7. That a copy of this Order shall be posted on the Commission’s website at the Electronic Data Exchange Working Group’s web page - <http://www.puc.pa.gov/utility_industry/electricity/edewg_files_for_downloading.aspx>.

8. That the Commission’s Bureau of Technical Utility Services shall provide a copy of this Order to the Electronic Data Exchange Working Group.

9. That the Commission’s Office of Competitive Market Oversight shall provide an electronic copy of this Order to the Committee Handling Activities for Retail Growth in Electricity (CHARGE).

 **BY THE COMMISSION,**

 Rosemary Chiavetta

 Secretary

(SEAL)

ORDER ADOPTED: November 5, 2015

ORDER ENTERED: November 5, 2015

1. The NRG Retail Affiliates are comprised of NRG Home, Green Mountain Energy Company and Energy Plus Holdings LLC. [↑](#footnote-ref-1)
2. The directives of the September 3, 2015 Final Order apply only to those EDCs with smart meter technology requirements as outlined in 66 Pa. C.S. § 2807(f). References to “EDCs” contained herein are reflective of those EDCs with smart meter technology requirements. [↑](#footnote-ref-2)
3. *See Pennsylvania Web Portal Working Group Solution Framework*, submitted by EDEWG, at Docket No. M-2009-2092655, received February 23, 2015 (hereinafter Solution Framework or Framework). [↑](#footnote-ref-3)
4. Third parties could include electric generation suppliers and customer-authorized third party entities. [↑](#footnote-ref-4)
5. *See* Letter from EDEWG, submitted February 4, 2014, at Docket No. M-2009-2092655. [↑](#footnote-ref-5)
6. *See* 66 Pa. C.S. § 2806.1 [↑](#footnote-ref-6)
7. *See* Solution Framework at cover letter. [↑](#footnote-ref-7)
8. *Id.* [↑](#footnote-ref-8)
9. *See* Solution Framework at 2-3. [↑](#footnote-ref-9)
10. *Id.* at 3. [↑](#footnote-ref-10)
11. *Id.* at cover letter. [↑](#footnote-ref-11)
12. References to these entities are a direct reference to their comments submitted either before or during the 30-day comment period created by the Tentative Order at Docket No. M-2009-2092655, unless otherwise stated. [↑](#footnote-ref-12)
13. All further references to these entities are a direct reference to their filings submitted after the Final Order at Docket No. M-2009-2092655, unless otherwise stated. [↑](#footnote-ref-13)
14. NRG Petition at 9. [↑](#footnote-ref-14)
15. *See* 66 Pa. C.S. § 2806. [↑](#footnote-ref-15)
16. NRG Tentative Order Comments at 10. [↑](#footnote-ref-16)