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July 29, 2016

**VIA e-FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

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

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Dear Secretary Chiavetta:

Enclosed for filing is the **Historical Interval Usage and Billing Quality Interval Usage Data Access Implementation Plan of PECO Energy Company** in regard to the above-referenced matter.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



W. Craig Williams

Enclosures

**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 :

**HISTORICAL INTERVAL USAGE AND BILLING  
QUALITY INTERVAL USAGE DATA ACCESS  
IMPLEMENTATION PLAN OF  
PECO ENERGY COMPANY**

Pursuant to the June 30, 2016 Final Order entered by the Pennsylvania Public Utility Commission (the “PUC” or “Commission”) in the above-referenced docket, PECO Energy Company (“PECO” or the “Company”) hereby submits this implementation plan to deploy the standardized solutions for the acquisition of historical interval usage (“HIU”) and billing quality interval usage (“BQIU”) data via a secure web portal, based on standards developed in the Electronic Data Exchange Working Group (“EDEWG”) and approved by the Commission.<sup>1</sup> In particular, PECO offers its plans to implement the Single User – Multiple Request (“SU-MR”) and the System-to-System Rolling 10 Day (“StS Rolling 10 Day”) functionalities ahead of the November 3, 2016 deadline, as preferred by the Commission.<sup>2</sup> Since substantially new standards for the System-to-System Historical Interval Usage (“StS HIU”) were just approved by the Commission in the Final Order, PECO is requesting slight relief from the November 3, 2016 implementation deadline as to that functionality. PECO also discusses below its total implementation costs and earlier recovery of those costs in its electric base rate case approved in

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<sup>1</sup> *Final Order: 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 (entered June 30, 2016) (“Final Order”).

<sup>2</sup> *Id.* at 2 & 13.

2015. Finally, PECO includes revised pages to its Electric Generation Supplier Coordination Tariff that reflect the EDEWG-developed and Commission-approved data access functionalities.

## I. BACKGROUND

On December 6, 2012, the Commission directed EDEWG to convene a Web Portal Working Group (“WPWG”) to develop standardized solutions for third-party access to customer HIU and BQIU data via an electric distribution company (“EDC”) secure web portal.<sup>3</sup> EDEWG was directed to complete development of standards for the HIU solution by March 1, 2014, and development of standards for the BQIU solution by March 1, 2015. The December 2012 Final Order only required that the standards be completed by these dates.<sup>4</sup>

On February 4, 2014, the EDEWG Leadership (“Leadership”) and WPWG membership filed a request to submit the standards for both HIU and BQIU by March 1, 2015.<sup>5</sup> That request was granted on April 17, 2014.<sup>6</sup>

On February 17, 2015, Leadership filed the Framework,<sup>7</sup> which contained the standards for authorized third parties (e.g., electric generation suppliers (EGSs) and conservation service providers (CSPs)) to access customer HIU and BQIU data through a secure EDC web portal. Leadership asked the Commission to resolve whether the StS functionalities should be mandatory or optional for the EDCs and for guidance about implementation deadlines.

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<sup>3</sup> *Smart Meter Procurement and Installation Final Order*, Docket No. M-2009-2092655 (Order entered December 6, 2012) (“December 2012 Final Order”), at 13-14.

<sup>4</sup> *Id.* at 14.

<sup>5</sup> See Letter from EDEWG, submitted February 4, 2014, at Docket No. M-2009-2092655.

<sup>6</sup> *Secretarial Letter: Request for Joint Filing for Historical Interval Usage (HIU) solution and Interval Usage (IU)*, Docket No. M-2009-2092655 (dated April 17, 2014).

<sup>7</sup> See *Pennsylvania Web Portal Working Group Solution Framework*, submitted by EDEWG, Docket No. M-2009-2092655 (February 23, 2015) (“Framework”).

On April 23, 2015, the Commission issued the Tentative Order, which proposed that EDCs implement the SU-MR option within eight months of the entry date of a Final Order in the proceeding (to come later) and to implement a mandatory StS functionality within twelve months of the date of the later Final Order.<sup>8</sup> PECO commented that both SU-MR and StS functionalities had a place in Pennsylvania's energy choice marketplace. PECO noted that it would need fourteen months from the later Final Order to implement the SU-MR option and eighteen months from the later Final Order to implement the StS options.<sup>9</sup>

On September 3, 2015, the Commission issued the September 2015 Final Order, which directed the EDCs with smart meter requirements to implement the SU-MR option outlined in the Framework within twelve months of the entry date of the September 2015 Final Order and the StS functionality outlined in the Framework within fourteen months of the entry date of the September 2015 Final Order.<sup>10</sup> However, the standards for the StS functionality had not been developed before the September 2015 Final Order, so the Commission directed EDEWG to reconvene the WPWG, with mandatory EDC participation, to develop (but not implement) standards for a uniform StS functionality.<sup>11</sup> The Commission required the WPWG to submit the recommended standards to the Commission, for its review and approval, within six months of the September 2015 Final Order (meaning February 2016).<sup>12</sup> The Commission indicated that it

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<sup>8</sup> *Tentative Order: 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 (Order entered April 23, 2015) ("Tentative Order").

<sup>9</sup> *PECO Comments: 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 (filed May 26, 2015) ("PECO Comments on Tentative Order").

<sup>10</sup> *Final Order: 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 (Order entered September 3, 2015) ("September 2015 Final Order").

<sup>11</sup> *Id.* at 18.

<sup>12</sup> *Id.*

would then provide further direction to the EDCs regarding final implementation of the StS functionality, as well as potential cost recovery.

On February 19, 2016, Leadership filed a letter request for an extension of time from March 3, 2016 to April 8, 2016 for the WPWG standards deliverables. The request for an extension of time was joined by the WPWG membership. WPWG had determined at this point that the StS functionality needed to be split into two solutions with two individual standards, in addition to the standards for the SU-MR. Going forward there would be three data-sharing functionalities for EDCs to build with separate standards for each: SU-MR, the StS HIU (called the XML/WSDL Simple Object Access Protocol (SOAP) solution in the Framework), and the StS Rolling 10 Day (called Active EGS and/or Rolling 10 Day solution in the Framework).

On March 4, 2016, the request for an extension of time to April 8, 2016, was granted by way of Secretarial Letter.<sup>13</sup>

On April 7, 2016, EDEWG filed the recommended Implementation Standards for Commission review and approval. EDEWG requested that the Commission approve the Implementation Standards, and the WPWG recommended that the StS Rolling 10 Day solution be implemented either before or during the implementation of the StS HIU solution.<sup>14</sup>

On June 30, 2016, the Commission issued the Final Order, which approved the Implementation Standards and directed EDCs with smart meter requirements to submit these implementation plans within 30 days. The deadlines for the SU-MR, Sts Rolling 10 Day and StS

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<sup>13</sup> *Secretarial Letter: Request for an Extension of the Due Date for the Web Portal Working Group's System-to-System Standard from March 3, 2016 until April 8, 2016*, Docket No. M-2009-2092655 (dated March 4, 2016).

<sup>14</sup> Final Order, at 7.

HIU functionalities were all set at November 3, 2016, although the Commission strongly encouraged the EDCs to implement any or all of the functionalities sooner, if feasible.<sup>15</sup>

## II. PECO'S IMPLEMENTATION PLAN

### A. IMPLEMENTATION OF "SU-MR" AND "STS ROLLING 10-DAY"

PECO is in the final stages for deploying both the SU-MR and StS Rolling 10-Day solutions ahead of the implementation deadlines as set out in the Final Order. SU-MR will be built in accordance with the standards approved in the Final Order, which will enable authorized users to access account level and meter level HIU and BQIU through PECO's main web page. Users will manually log into the interface via the [peco.com](http://peco.com) public web site and may request and receive a minimum of 12 months of HIU and BQIU within 48 hours of daily meter reads. This platform will require eligible third parties to review user access and requests quarterly. For the purpose of tracking, auditing and reporting, PECO's solution will track access to the portal and maintain at least three years of log history of that portal activity. Prior to implementation, PECO will communicate and demonstrate the functionality with eligible users.

PECO expects to have this solution deployed by September 5, 2016, nearly two months ahead of the Commission's November 3, 2016 deadline.

Similarly, PECO is on track to deploy and implement the StS Rolling 10 Day solution ahead of the implementation deadline. The StS Rolling 10 Day will provide EGS users with meter level intervals within 48 hours of the meter read for all accounts that the user's EGS served on the published read date. Permitted users will access and download their entity's usage

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<sup>15</sup> Final Order, at 13 ("[T]he EDCs must implement the SU-MR functionality no later than the 14-month deadline provided for the System-to-System Rolling 10- Day (StS Rolling 10 Day) and the System-to-System Historical Usage (StS HIU) solutions – November 3, 2016. We strongly encourage the EDCs, where feasible, to implement any or all of the functionalities before that deadline." (emphasis added)).

files through a secure web portal. The data for the rolling 10 days will be available without republication of the files outside of the rolling 10 day period. Prior to implementation and similar to SU-MR, PECO will communicate and demonstrate the StS Rolling 10 Day functionality to eligible users.

PECO currently expects to have this solution deployed by October 14, 2016, nearly three weeks ahead of the Commission's November 3, 2016 deadline.

## **B. IMPLEMENTATION OF "STS HIU"**

At the outset, it is important to note that the Framework did not include solutions or standards for StS HIU, because the bifurcated StS functionality was not yet identified. In fact, it was in the September 2015 Final Order that the Commission ordered the EDEWG to reinstitute the WPWG to develop – but not implement – the standards for the uniform StS HIU functionality.

The StS HIU standards that were later recommended by EDEWG and the WPWG, and approved by the Commission, are more extensive and detailed than those contemplated in the earlier Framework. By comparison, the StS Rolling 10 Day is technically less complex to implement than the StS HIU. The StS Rolling 10 Day covers a shorter time horizon of usage than the HIU. The StS Rolling 10 Day also involves substantially less data, both in terms of the time period covered and the components of data being provided (usage, demand and other data elements in the StS HIU versus usage only in the StS Rolling 10 day functionality). Further, the newly approved StS HIU standard includes a fully defined data dictionary, while the StS Rolling 10-Day does not, as its simplicity does not require such an artifact. The StS Rolling 10-Day does not require a form of "near real-time" interactions which is required for StS HIU. As a result,

StS Rolling 10 Day requirements permit PECO to use pre-existing, batch-driven delivery. In contrast, the near real-time element of the StS HIU requires IT to build new components which cannot leverage existing systems. Finally, PECO plans to implement the StS Rolling 10-Day within the SU-MR framework (the web portal), allowing PECO to gain further efficiencies by sharing a significant portion of the security and technical work common to both SU-MR and StS Rolling 10 Day implementations. The StS HIU solution is by and large technically independent of the SU-MR solution on the “front end,” sharing primarily the back-end integration needed to retrieve the data and by its nature requiring additional security and technical development beyond the other two data-access functionalities.

So, while the StS Rolling 10 Day standards also were not approved before the June 30, 2016 Final Order, the comparative simplicity of StS Rolling 10 Day translated to a lower implementation risk for PECO, which permitted PECO to move forward on design and implementation of the StS Rolling 10 Day before a final-approved standard. Additionally, EGSs participating in WPWG meetings that convened prior to the Commission’s September 2015 Order made clear that, because of the comparatively lower complexity and the fact that suppliers would not need to build anything on their end, they preferred that implementation priority be placed on the StS Rolling 10 Day StS functionality over the StS HIU.

Therefore, PECO is prepared to implement the StS Rolling 10 Day ahead of the implementation deadline. However, PECO asks for slight relief of the November 3, 2016 deadline as it pertains to the StS HIU functionality. PECO cannot meet that deadline without

jeopardizing its commitment to meet or exceed the implementation deadline for the other two functionalities. PECO can implement StS HIU in its very next IT push on December 9, 2016.<sup>16</sup>

### **III. PECO'S UPDATED COSTS FOR IMPLEMENTATION AND COST RECOVERY**

In its comments to the Commission's April 23, 2015 Tentative Order (and in response to Commissioner Cawley's questions), PECO estimated the total costs of implementing the SU-MR option at approximately \$1.8 million, with an additional annual maintenance fee of approximately \$360,000.<sup>17</sup> PECO also estimated the total costs of implementing the StS functionality at approximately \$2 million, with an additional annual maintenance fee of approximately \$400,000. Those estimates were premised on two assumptions: (1) the implementation of the Framework solutions would be consistent with the standards in the Framework; 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.

As PECO indicated at the time, if the Commission established the shorter timeframes proposed in the Tentative Order, PECO expected its total implementation costs would increase by approximately 30-50% (to approximately \$5 – \$5.7 million) due to the design volume and additional complexity of deploying the functionalities concurrently on a tighter timetable. PECO

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<sup>16</sup> Exelon coordinates its Information Technology ("IT") pushes across the entire enterprise, so that all systems changes and improvements are carefully deconflicted company-wide. The IT pushes are scheduled many months in advance to occur every other month and cannot be changed within the Exelon IT structure, absent exigent circumstances like catastrophic storms.

<sup>17</sup> PECO Comments on Tentative Order, at 6.

also indicated that its cost estimate was predicated on the assumed standards at the time, and costs might increase if the standards were later changed.<sup>18</sup>

Taking into account the new StS HIU standards recommended by EDEWG and approved by the Commission, as well as the shortened implementation schedule (even with the requested one-month extension), PECO now estimates the total project cost at \$5.7 million, which includes costs incurred to date and projected costs to complete the implementation of SU-MR, StS Rolling 10 Day and StS HIU. Ongoing maintenance costs will be approximately \$750,000 annually. These ongoing costs include but are not limited to hosting and technical support for the website, middleware and data management, and data storage.

In the Final Order, the Commission directed EDCs to propose, with justification, a cost recovery mechanism for costs incurred with implementation of the aforementioned data-sharing solutions.<sup>19</sup> PECO included these implementation costs in its 2015 electric base rate case, which was approved by the Commission on December 17, 2015.<sup>20</sup>

#### IV. TARIFF REVISIONS

PECO has included Supplement No. 27 to its Electric Generation Supplier Coordination Tariff (Tariff Electric PA PUC No. 1S), bearing an effective date of September 5, 2016, which reflects the EDEWG-developed and Commission-approved data access functionalities. A clean copy of the revised tariff is Attachment 1 to this plan; a redline copy of the revised tariff is Attachment 2 to this plan. Specifically, the tariff revision adds a definition of the Advanced Meter Data Portal to the Definition and Terms section and language to “Rule 4.13 – Data

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<sup>18</sup> *Id.* at 7.

<sup>19</sup> Final Order, at 13.

<sup>20</sup> *Pennsylvania Public Utility Commission v. PECO Energy Company – Electric Division*, Docket No. R-2015-2468981 (Order entered December 17, 2015).

Exchange,” indicating that customer information is available via the Data Portal. The tariff also contains the effective date of each of the data functionalities, as described above in Section II.

**V. CONCLUSION**

PECO supports these efforts to utilize the capabilities of smart meter technology to advance products in the marketplace. To that end and accounting for the expressed preferences of suppliers and the Commission, PECO will implement both the SU-MR and StS Rolling 10 Day web portal functionalities ahead of the November 3, 2016 deadline. However, due to the added complexities of the StS HIU and the recent approval of standards for that functionality, PECO requests slight relief to implement the StS HIU on its December 9, 2016, IT push date. PECO reiterates that its costs are included in its previously approved base rates. PECO also requests approval of the included revisions to the Electric Generation Supplier Coordination Tariff, reflecting the EDEWG-developed and Commission-approved data access functionalities.

Respectfully submitted,



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Date: July 29, 2016

*For PECO Energy Company*

# **ATTACHMENT 1**

**PECO ENERGY COMPANY**

**ELECTRIC GENERATION SUPPLIER COORDINATION TARIFF**

**COMPANY OFFICE LOCATION**

**2301 Market Street**

**Philadelphia, Pennsylvania 19103**

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**Issued: July 29, 2016**

**Effective: September 5, 2016**

**ISSUED BY: C. L. Adams – President & CEO  
PECO Energy Distribution Company  
2301 MARKET STREET  
PHILADELPHIA, PA. 19103**

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**NOTICE.**

Supplement No. 27 to  
Tariff Electric Pa. P.U.C. No. 1S  
Eighteenth Revised Page No. 1A

**PECO Energy Company** **Superseding Seventeenth Revised Page No. 1A**

**LIST OF CHANGES MADE BY THIS SUPPLEMENT**

**Definition of Terms and Explanation of Abbreviations – 3<sup>rd</sup> Revised Page No. 7**

Definition added for PECO Advanced Meter Data Portal in accordance with the Final Order entered June 30, 2016; Docket M-2009-2092655.

**Data Exchange – 3<sup>rd</sup> Revised Page No. 15**

Revised language added in accordance with the Final Order entered June 30, 2016; Docket M-2009-2092655.

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Issued July 29, 2016

Effective September 5, 2016

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**PECO Energy Company** **Superseding Second Revised Page No. 7**

**Network Integration Transmission Service Reservation** - a reservation under the PJM Tariff of Network Integration Transmission Service, which allows a transmission Customer to integrate and economically dispatch generation resources located at one or more points in the PJM Control Area to serve its Network load therein.

**PaPUC or Commission** - The Pennsylvania Public Utility Commission.

**PECO Advanced Meter Data Portal** - Standardized solution for the acquisition of historical interval usage ("HIU and billing quality interval usage ("BQIU") via the Single User-Multiple Request ("SU-MR")), effective September 5, 2016 and System to System Rolling 10 Day ("StS Rolling 10 Day"), effective October 14, 2016, and System to System Historical Interval Usage ("StS HIU") functionalities, effective December 9, 2016. (C)

**PJM** - the Pennsylvania-New Jersey-Maryland Interconnection.

**PJM Control Area** - that certain Control Area encompassing systems in Pennsylvania, New Jersey, Maryland, Delaware and the District of Columbia and which is recognized by the North American Electric Reliability Council as the "PJM Control Area."

**PJM eScheduler System** - software program administered by the PJM OI through which energy load schedules may be submitted.

**PJM OI** - the PJM Office of Interconnection, the system operator for the PJM Control Area.

**PJM Tariff** - the PJM Open Access Transmission Tariff on file with the FERC and which sets forth the rates, terms and conditions of transmission service over transmission facilities located in the PJM Control Area.

**Scheduling Coordinator** - an entity that performs one or more of an EGS's Coordination Obligations, including the submission of energy schedules to the PJM OI, and that either is (1) a member of the PJM Interconnection, L.L.C. or (2) is the agent, for scheduling purposes, of one or more Electric Generation Suppliers that are members of the PJM Interconnection, L.L.C.

**Small Business Customer** - A person, sole proprietorship, partnership, corporation, association or other business entity that receives electric service under a small commercial, small industrial or small business rate classification, and whose maximum registered peak load was less than 25 kW within the last 12 months.

**Tariff** - this Electric Generation Supplier Coordination Tariff.

**The Company** - PECO Energy Company.

**Unaccounted for Energy ("UFE")** - The difference between the actual system load of the Company and the sum of all Customer load (EGS and the Company).

**PECO Energy Company**

- (b) An EGS must notify its Customers that by signing up for Competitive Energy Supply with the EGS, the Customer is consenting to the disclosure by the Company to the EGS of certain basic information about the Customer.
- (c) In accordance with Commission Order M-2009-2092655 dated June 30, 2016 and any other applicable Commission orders, the Company shall make Historical Interval Usage and Bill Quality Interval Usage from PECO electric smart meters available to an EGS via the PECO Advanced Meter Data Portal and related XML transactions. These mechanisms will conform to specific standards set forth in the Technical Implementation Standards developed by the Web Portal Working Group ("WPWG"), a sub-group of and convened by the EDEWG. (C)

**4.14 Code of Conduct.** The Electric Service Code of Conduct Rules – 52 PA Code §54.122 are incorporated herein by reference.

**4.15 Standards of Conduct and Disclosure for Licensed EGSs.** The Standards of Conduct and Disclosure for Licensees 52 PA Code §54.43 are incorporated herein by reference.

(C) Denotes Change

# **ATTACHMENT 2**

Supplement No. 27 to  
Tariff Electric Pa. P.U.C. No. 1S

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**PECO ENERGY COMPANY**

**ELECTRIC GENERATION SUPPLIER COORDINATION TARIFF**

**COMPANY OFFICE LOCATION**

**2301 Market Street**

**Philadelphia, Pennsylvania 19103**

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**ISSUED BY: C. L. Adams – President & CEO**  
**PECO Energy Distribution Company**  
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**PHILADELPHIA, PA. 19103**

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**NOTICE.**

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Supplement No. 27 to  
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Third Revised Page No. 7

~~PECO Energy Company~~ ~~Superseding Second Revised Page No. 7~~  
**Network Integration Transmission Service Reservation** - a reservation under the  
PJM Tariff of Network Integration Transmission Service, which allows a transmission  
Customer to integrate and economically dispatch generation resources located at one  
or more points in the PJM Control Area to serve its Network load therein.

**PaPUC or Commission** - The Pennsylvania Public Utility Commission.

**PECO Advanced Meter Data Portal** - Standardized solution for the acquisition of  
historical interval usage ("HIU and billing quality interval usage ("BQIU") via the Single  
User-Multiple Request ("SU-MR")), effective September 5, 2016 and System to System  
Rolling 10 Day ("StS Rolling 10 Day"), effective October 14, 2016 and System to System  
Historical Interval Usage ("StS HIU") functionalities, effective December 9, 2016. (C)

**PJM** - the Pennsylvania-New Jersey-Maryland Interconnection.

**PJM Control Area** - that certain Control Area encompassing systems in Pennsylvania,  
New Jersey, Maryland, Delaware and the District of Columbia and which is recognized  
by the North American Electric Reliability Council as the "PJM Control Area."

**PJM eScheduler System** - software program administered by the PJM OI through which  
energy load schedules may be submitted.

**PJM OI** - the PJM Office of Interconnection, the system operator for the PJM Control Area.

**PJM Tariff** - the PJM Open Access Transmission Tariff on file with the FERC and which sets  
forth the rates, terms and conditions of transmission service over transmission facilities  
located in the PJM Control Area.

**Scheduling Coordinator** - an entity that performs one or more of an EGS's Coordination  
Obligations, including the submission of energy schedules to the PJM OI, and that either is  
(1) a member of the PJM Interconnection, L.L.C. or (2) is the agent, for scheduling purposes,  
of one or more Electric Generation Suppliers that are members of the PJM Interconnection,  
L.L.C.

**Small Business Customer** - A person, sole proprietorship, partnership, corporation,  
association or other business entity that receives electric service under a small commercial,  
small industrial or small business rate classification, and whose maximum registered peak  
load was less than 25 kW within the last 12 months.

**Tariff** - this Electric Generation Supplier Coordination Tariff.

**The Company** - PECO Energy Company.

**Unaccounted for Energy ("UFE")** - The difference between the actual system load of  
the Company and the sum of all Customer load (EGS and the Company).

Issued July 29, 2016

Effective September 5, 2016

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- (b) An EGS must notify its Customers that by signing up for Competitive Energy Supply with the EGS, the Customer is consenting to the disclosure by the Company to the EGS of certain basic information about the Customer.
- (c) In accordance with Commission Order M-2009-2092655 dated June 30, 2016 and any other applicable Commission orders, the Company shall make Historical Interval Usage and Bill Quality Interval Usage from PECO electric smart meters available to an EGS via the PECO Advanced Meter Data Portal and related XML transactions. These mechanisms will conform to specific standards set forth in the Technical Implementation Standards developed by the Web Portal Working Group ("WPWG"), a sub-group of and convened by the EDEWG

4.14 Code of Conduct. The Electric Service Code of Conduct Rules – 52 PA Code §54.122 are incorporated herein by reference.

4.15 Standards of Conduct and Disclosure for Licensed EGSs. The Standards of Conduct and Disclosure for Licensees 52 PA Code §54.43 are incorporated herein by reference.

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