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August 1, 2016

VIA ELECTRONIC 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 Solution Framework for Historical Interval Usage
And Billing Quality Interval Use;
Docket No. M-2009-2092655***

Dear Secretary Chiavetta:

Pursuant to the Commission's Final Order entered on June 30, 2016 in the above-referenced proceeding, enclosed herewith for filing is the Implementation Plan of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company.

Please contact me if you have any questions regarding this matter.

Very truly yours,



Tori L. Giesler

l/m
Enclosures

**SINGLE USER - MULTIPLE REQUESTS,
SYSTEM-TO-SYSTEM ROLLING 10-DAY
AND SYSTEM-TO-SYSTEM HISTORICAL
INTERVAL USAGE SOLUTIONS**

IMPLEMENTATION PLAN

**METROPOLITAN EDISON COMPANY
PENNSYLVANIA ELECTRIC COMPANY
PENNSYLVANIA POWER COMPANY
WEST PENN POWER COMPANY**

August 1, 2016

BACKGROUND

On April 23, 2015, the Pennsylvania Public Utility Commission (“Commission”) issued a Tentative Order at the above-captioned docket (“Tentative Order”) outlining a proposal for the development of an electric distribution company (“EDC”)-provided standardized solution for the acquisition of historical interval usage (“HIU”) and billing quality interval usage (“BQIU”) data through a secure web portal. The Tentative Order sought comments from interested parties on the proposal, which comments were submitted on May 26, 2015 by a variety of EDCs, industry groups, customer groups, and electric generation suppliers (“EGSs”). Following consideration of those comments, the Commission issued a Final Order on the proposal on September 3, 2015 (“September Final Order”). The September Final Order prescribed the development of this web portal solution to take place in two phases, with a Single User - Multiple Request (“SU-MR”) version to be implemented no later than eight months from the entry of the Final Order, and System-to-System (“StS”) functionality to be implemented no later than twelve months following the entry of the September Final Order. The September Final Order also directed that the specifics of the StS model are to be developed by reconvening the Electronic Data Exchange Working Group’s (“EDEWG”) Web Portal Working Group (“WPWG”) for further discussion and subsequent recommendations to the Commission.

On June 30, 2016, the Commission entered a Final Order at this docket adopting the WPWG’s recommendations as submitted by EDEWG on April 12, 2016¹ (“June Final Order”). The June Final Order directed that all EDCs submit, within thirty days, implementations plans outlining how they would comply with the Implementation Standards with a revised deadline for implementation of November 3, 2016.

¹ See *Pennsylvania Web Portal Working Group Technical Implementation Standards*, submitted by EDEWG, at Docket No. M-2009-2092655, submitted April 12, 2016 (“Implementation Standards”).

Consistent with this directive, Metropolitan Edison Company (“Met-Ed”), Pennsylvania Electric Company (“Penelec”), Pennsylvania Power Company (“Penn Power”) and West Penn Power Company (“West Penn”) (collectively, the “Companies”) now submit this joint plan (“Plan”) for meeting the Implementation Standards by November 3, 2016.

IMPLEMENTATION PLAN

The Companies actively participated in the reconvening of the WPWG to discuss standards associated with the StS Rolling Ten-Day and StS HIU models, while also working internally to build the functionality behind the SU-MR solution. All requirements related to each of these standards demand functionality that does not exist today for the Companies. Currently, the Companies utilize a password protected secure supplier portal to store eligible customer lists, sync lists, interval files, as well as to offer access to the EDC Customer Account Number Lookup Mechanism. The Companies plan to integrate the SU-MR and StS Rolling Ten-Day Solutions into this existing portal, with full functionality to become available by November 3, 2016.

The Companies intend to host webinars to discuss their implementation of the solution framework, which meetings will provide EGSs with details regarding the implementation timeline, instructions for initial setup, and an explanation of what data they should expect to receive and when. All information relevant to the portal will also be found in the Companies’ user guide. The Companies will provide, on or before Nov 3, 2016, the following functionality for each of the three solutions:

SOLUTION FRAMEWORK

Single User - Multiple Request

The Companies will implement all functionality required by the Commission-approved Implementation Standards by November 3, 2016. This option will allow EGSs to view all mandated customer attributes, as well as summary level usage via an online view. Additionally, the Companies will support an EGS export of a CSV file which will not only include the customer attributes and summary level data, but also the last twelve months of interval data. This interval data will become available as referenced in the Smart Meter Interval Data section of this Plan, below.

System-to-System Rolling Ten-Day

As with the SU-MR model, the Companies will implement all functionality required by the Commission-approved Implementation Standards related to the StS Rolling Ten-Day solution by November 3, 2016. Upon implementation, EGSs will be able to retrieve daily files that contain interval customer data within the Companies' supplier portal. The files will be published daily, with the oldest file being removed and an additional file added, giving EGSs access to a rolling ten days of customer data at any given time. Multiple files for each day could be available based on the size of each file, as well as the intervals individual customers are measured by. This interval data will become available as referenced in the Smart Meter Interval Data section of this Plan, below.

System-to-System Historical Interval Usage

As with the Companies' timeline for implementation of the SU-MR and StS Rolling Ten-Day solutions, the Companies will implement all functionality required by the Commission-approved Implementation Standards relative to the StS HIU model by November 3, 2016. Once

implemented, EGSs will be able to use a Simple Object Access Protocol (“SOAP”) address which will allow them to retrieve customer data consisting of both customer attributes and interval usage via XML format. This interval data will become available as referenced in the Smart Meter Interval Data section of this Plan, below.

SMART METER INTERVAL DATA

The Companies recognize the need for licensed EGSs and other Act 129 Conservation Service Providers (“CSPs”) contracted with the EDCs and their contracted agents to access the HIU and BQIU available from smart meters. While the SU-MR, StS Rolling Ten-Day and StS HIU portals will be fully functional by November 3, 2016, the relevant interval data from smart meters will not be available per the Companies’ Commission-approved smart meter deployment plan for some additional time. It is expected that data will begin to be available towards the end of the first quarter of 2017, at which point the back office system build out, business processes, meters, and interval data are anticipated to become operational. This is the time by which the Companies expect that their integrated solution, including the supporting interval data, will be fully operational.²

The Companies’ Commission-approved smart meter deployment plan includes the design and build of back-office infrastructure (systems, processes, and staffing) necessary to enable smart meter capabilities in parallel with the exchange of the meters themselves at the customer premise and the certification of the interval data. Beyond November 2016, the Companies will continue to develop their advanced meter infrastructure back office functionality, as well as continue to

² Given the lack of availability of data until this time, the models will be technically available but without functional use without the interval data.

exchange smart meters at each premise consistent with the approved implementation plan. The back office infrastructure necessary to collect, process, and manage interval data from smart meters includes the integration of the collection engine, meter data management system, billing system, data warehouse, settlement system, customer portal and SU-MR, StS Rolling 10-Day, StS HIU third party portals. It also requires each meter and its data to be validated throughout the entire process to ensure the data is collected in a timely manner and is accurate throughout all the processes. With this approach, all market participants will have simultaneous access to the interval data as it becomes available from each smart meter. With the completion of the necessary systems and processes in the first quarter of 2017, those meters that have passed certification will have their data available to the third party supplier portals. The Companies anticipate that approximately 165,000 meters will be certified before the end of the first quarter 2017. Another 500,000 additional meters that are to be deployed throughout 2016 anticipated to have been exchanged at the customer premise by this time will commence a certification process on a meter reading unit by meter reading unit (or route by route) basis over a period of several months following the initial first quarter 2017 rollout and be available after that process is completed.

Meter exchanges will continue through 2022 consistent with the Commission-approved deployment plan, with the schedule projecting that 98.5% of installations will be complete by mid-2019. The remaining 'hard-to-reach' 1.5% will be exchanged through 2022. For smart meter exchanges occurring after the release in first quarter 2017, interval data will become available approximately three months from the time of exchange in order to allow completion of both the particular meter reading route in whole and the bill certification process.

COST RECOVERY

The Companies project approximately \$200,000 associated with implementing these three solutions. The costs associated with these solutions are related to hardware costs as well as capital labor hours. It is further anticipated that there will be approximately \$7,500 of annual ongoing maintenance costs associated with data storage. The Companies propose to collect these expenses via their Smart Meter Technologies Riders (SMT-C).

CONCLUSION

As outlined, the Companies expect to have all required functionality available by the stated deadline of November 3, 2016 consistent with the Commission-approved Implementation Standards. However, actual data will not be available, due to smart meter deployment timelines already approved under their Smart Meter Implementation Plan, until the end of first quarter 2017. The Companies expect that all functionality as described by the Implementation Standards will be available to users at that time.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

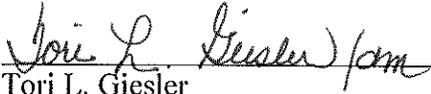
Service by first class mail and email, as follows:

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Dated: August 1, 2016


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