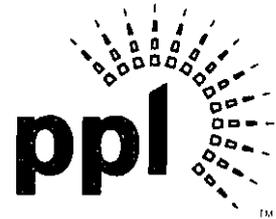


Paul E. Russell
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Federal Express

August 10, 2016

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

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AUG 10 2016

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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

Dear Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is a copy of PPL Electric Utilities Corporation Compliance Filing Plan for Implementing Web Portal Working Group's Solution Framework. This Compliance Plan is being filed pursuant to the Public Utility Commission's Final Order entered on June 30, 2016 in the above-captioned Proceeding. PPL Electric originally attempted to file this document on August 1, 2016 under Federal Express tracking No. 776888570736. It appears as though this package was not delivered.

In addition, please date and time-stamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding this Compliance Plan, please contact me at (610) 774-4254 or Susan M. Scheetz, PPL Electric's Billing Specialist, at (484) 634-3228.

Very truly yours,


Paul E. Russell

Enclosures

cc via email: Tanya J. McCloskey, Esquire
Mr. John R. Evans
R. Kanaskie, Esquire

**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

**PPL ELECTRIC UTILITIES CORPORATION
COMPLIANCE FILING
PLAN FOR IMPLEMENTING WEB PORTAL
WORKING GROUP'S SOLUTION FRAMEWORK**

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BACKGROUND

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

In the Public Utility Commission's ("PUC" or the "Commission") *Smart Meter Procurement and Installation Final Order*, at Docket No. M-2009-2092655 (Order entered December 6, 2012) ("Dec. 2012 Final Order"), the Electronic Data Exchange Working Group ("EDEWG") was directed to convene a Web Portal Working Group ("WPWG") to develop standardized solutions for third-party acquisition of a customer's historical interval usage ("HIU") and billing quality interval usage ("BQIU") data via an electric distribution company ("EDC"), secure web portal. 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 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. The WPWG stated 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.

On February 17, 2015, Leadership filed the *EDEWG Pennsylvania Web Portal Working Group Solution Framework* ("Solution Framework" or "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 conservation service providers ("CSPs"), to acquire both HIU and BQIU data within 48 hours of daily meter reads. Leadership also stated that the document was a group consensus regarding the minimally-required standards for the secure web portals.

Leadership indicated that the only non-consensus item from the WPWG was determining whether the implementation of a System-to-System ("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.

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

Single User - Single Request ("SU-SR") – A user-based platform allowing an authorized user to manually log into the portal, request, and receive data for one individual account at a time through 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.

Single User - Multiple Requests (SU-MR) – This option is 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.

System-to-System (StS) – This option was 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 example, this communications could involve the use of File Transfer Protocol, aka "FTP," or web services to transmit and satisfy requests.

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. 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.

In 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 Tentative Order*, at Docket No. M-2009-2092655 (Order entered April 23, 2015) ("Tentative Order"), the Commission directed the EDCs to implement the SU-MR option within eight months of the entry date of a Final Order in the proceeding and to

implement a mandatory StS functionality within 12 months of the date of the Final Order.

In 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* Final Order, at Docket No. M-2009-2092655 (Order entered September 3, 2015) ("Sept. 2015 Final Order"), the Commission directed 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. The Commission 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 review and approval, its recommendations within six months of the entry date of the Sept. 2015 Final Order.

The EDEWG Leadership, with the full support of the WPWG membership, filed on February 24, 2016, a request that the Commission grant an extension of time for the WPWG deliverables from March 3, 2016, until April 8, 2016. Leadership stated that the WPWG determined its scope had to increase to accommodate both StS solutions, as well as split the Framework into individual standards, one each for the 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) methods. This request was granted in a Secretarial Letter dated March 4, 2016.

Leadership filed the EDEWG *Pennsylvania Web Portal Working Group Technical Implementation Standard(s)*, at Docket No. M-2009-2092655 ("Implementation Standards") on April 7, 2016. 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.

As outlined in the Final Order at Docket No. M-2009-2092655 (Order entered June 30, 2016), EDCs are required to submit compliance plans within 30 days of the entry date of the final Order. The EDC compliance plans must include the implementation of 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 Interval Usage (StS HIU) solutions by November 3, 2016.

COMPLIANCE PLAN

A. SINGLE USER – MULTIPLE REQUESTS ("SU-MR")

PPL Electric agrees that the SU-MR methodology is beneficial for use by both licensed EGSs and CSPs. This methodology permits authorized users to log into the portal and receive data for more than one account number as part of a single request.

SU-MR is currently offered by PPL Electric to all licensed EGSs and CSPs through its existing Supplier Portal. However, full compliance with the SU-MR implementation protocols will require PPL Electric to modify its existing Supplier Portal to utilize the standard data format outlined in the Framework. PPL Electric will continue

to provide this data within 48 hours of the daily meter reads. The modifications necessary for the existing platform, as well as the Solutions Framework functionality, will be implemented as ordered on or before November 3, 2016. Implementation of the Framework will provide EGSs with the following new functionalities:

- A new "Superscreen" view of customer demographic data;
- Increased 24 months of summary usage data as billed;
- Increased 24 months of interval usage data, including quantity qualifiers indicating if the meter reads were actual or estimated; and
- A comprehensive download capability.

B. SYSTEM-TO-SYSTEM ("STS")

PPL Electric agrees that the StS platform allowing an authorized user's information technology ("IT") system to communicate directly with a web portal system of the EDC without requiring a user to manually log into the web portal itself or use file transfer protocols or web services to satisfy the requests is beneficial.

StS is currently not offered by PPL Electric through its existing Supplier Portal. Compliance with the StS implementation will require PPL Electric to modify its existing Supplier Portal to provide the standard data formats outlined in the Framework for both the comprehensive data format and the rolling 10-day format. This data will be provided within 48 hours of the daily meter reads. The modifications necessary for the existing platform, as well as the Solutions Framework functionality, will be implemented as ordered on or before November 3, 2016. The result of the Framework implementation will provide the EGSs the following new functionalities:

- An automated method, as a supplement to the SU-MR method, to streamline the download of the data elements provided in the SU-MR superscreen;
- A more robust method to obtain data in a timely manner;
- The ability to automate a secure transport facility; and
- An automated comprehensive download capability.

ADDITIONAL COMMENTS

PPL Electric is currently making several changes to its Meter Data Management System. The Meter Data Management System is the data source for the HIU data and the BQIU data that will be provided through the secure web portal. There is a remote possibility that the Meter Data Management System replacement project could impact PPL Electric's ability to provide all of the data elements as outlined in the Solutions Framework for November 3, 2016. For example, the interval usage qualifiers indicating whether the meter read is actual or estimated may not be available in the unlikely event that the Meter Data Management System replacement project timeline changes for unforeseen circumstances. However, the vast majority of the required data elements will be available in both the old and new systems, and will be included in the November 3, 2016 implementation as ordered.

COST RECOVERY

PPL Electric estimates that the one-time incremental costs associated with implementing the *Single User-Multiple Request and System-to-System functionality* outlined in the Framework will be approximately \$150,000, which includes modifications

to the Company's existing Supplier Portal. The modifications to PPL's existing Supplier Portal supporting the SU-MR functionality will primarily consist of expanding the data available to EGSs with a more comprehensive view and expanded download capabilities. The modifications to PPL Electric's existing Supplier Portal supporting the StS functionality will include a new system to system automated transport and delivery mechanism to expand the data access functionality and increase the timeliness of retrieval of the data. PPL Electric proposes to seek recovery of these costs through the Competitive Enhancement Rider ("CER").

CONCLUSION

WHEREFORE, PPL Electric Utilities Corporation requests that the Pennsylvania Public Utility Commission approve the Company's compliance plan for implementation of the Web Portal Working Group's Solution Framework, as set forth herein.

Respectfully submitted,



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Kimberly A. Klock (ID # 89716)
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Date: August 1, 2016

Attorneys for PPL Electric Utilities Corporation

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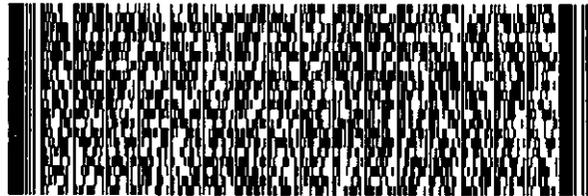
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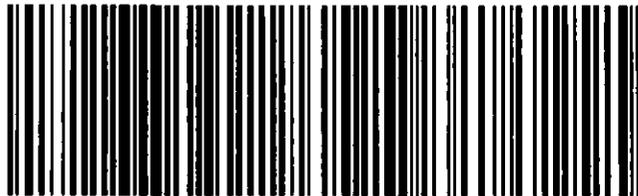
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