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Constellation is a licensed electric generation supplier (“EGS”) in the Commonwealth and currently provides integrated energy solutions and services to a wide range of customers in the Commonwealth – including public sector customers, office buildings, commercial retail establishments and various other commercial, industrial and not-for-profit entities – as well as a wide range of retail customers across the U.S. Constellation has been an active intervenor in the above-docketed proceeding.

## **II. CONSTELLATION’S COMMENTS IN RESPONSE TO THE MOTION**

In the Motion, Commissioner Powelson commends PECO for its “commitment to use EDI protocols to provide consumption and other information to third parties,” but notes that “[o]ther utilities throughout the Commonwealth have or will be soon implementing [HIU] transaction capabilities,” and asks parties to consider whether PECO should adopt them as well.<sup>3</sup>

Constellation echoes Commissioner Powelson’s approval of PECO’s “commitment to use EDI protocols to provide consumption and other information,” and comments herein that PECO also should provide HIU transaction capabilities through its EDI system. Currently, if an EGS such as Constellation seeks usage and other information for an interval account customer in PECO’s territory, the EGS must obtain such information through a manual process, contacting PECO, for instance, by email, and awaiting a response that may include such information. In practice, this process with PECO can take *at least* a day and *up to* a week, depending on the nature of the data requested, limiting *significantly* the EGS’s ability to evaluate and prepare a

timely offer for the interval account customer's consideration. Alternatively, suppliers may obtain data off of PECO's SUCCESS website. However, this process is not entirely sufficient because the data that is returned includes only interval usage data and omits other customer account attributes necessary to properly develop offers for customers, including, but not limited to, rate codes, load profile groups, meter cycle information and transmission and capacity Peak Load Contribution values.

On the other hand, where utilities provide all interval account information – including usage and all other necessary information – either through EDI systems or web-interfaces (through which EGSs may download customer information), EGSs are able to almost instantly obtain and begin to process data in order to provide accurate, timely and competitive offers to customers. In this way, Constellation encourages PECO to provide information related to interval accounts (including, but not limited to, HIU data, specifically) through its EDI protocols or, at least through some sort of direct-download web-interface.

The Motion also asks that parties comment, more generally, on “PECO’s current interval usage data processes, so as to assist the Commission in its decision.”<sup>4</sup> First, Constellation asks that the Commission require PECO to automatically remove restrictions to an interval account customer’s data once an EGS has been licensed and is registered with PECO to operate through its EDI systems. It is the EGS’s responsibility to ensure that it obtains a Letter of Authorization (“LOA”) from a customer, granting the EGS permission to access its account information and data. After providing a LOA to the EGS, the customer *should not* have to communicate separately with PECO in order to remove any restrictions on its account with respect to that

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<sup>3</sup> Motion at pp.1-2.

<sup>4</sup> Motion at p.2.

particular EGS. This automatic process has been adopted by utilities in the Commonwealth such as the PPL Electric Utilities Corporation, and should also be adopted by PECO.

Constellation also asks that the Commission generally require that a utility provide via EDI (or another web-interface) summary usage (regardless of the type of account – interval or otherwise), interval usage (for interval accounts) and all account attributes (e.g., rate class, load profile, meter read cycle information, etc.). In other words, for an interval metered account, the EGS should receive via an EDI data response transmission (or through a web-interface) both the granular, interval level data, as well as the summary data (the summation of the interval reads). Additionally, an EGS that wants to receive only summary level data should be able to indicate this preference in the proper EDI data request transaction. The ability to request only summary level data may be important to some EGSs because they incur significant data handling costs when receiving interval level data.<sup>5</sup> Finally, in the EDI summary usage data for each particular account, utilities should be required to include some sort of indicator identifying whether the summary usage is for an *interval* account. To the extent PECO's current interval data processes do not provide all of such information, the Commission should require that PECO amend its practices.

### III. CONCLUSION

Constellation appreciates this opportunity to submit its Comments to the Commission in response to the Motion and looks forward to continued discussions with all stakeholders on these and other issues related to the development of the competitive market in the PECO service territory and throughout the Commonwealth. Constellation is confident that its suggestions herein will improve access for both customers and EGSs, and will encourage more robust

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<sup>5</sup> EGSs also should be able to designate in a customer enrollment transaction their desire, if any, to receive only summary level monthly billing data for customers.

development of PECO's competitive retail market, carrying out the Commission's goals for the Commonwealth.

Respectfully submitted,



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*On Behalf of Constellation NewEnergy, Inc.*

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