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May 17, 2010

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VIA OVERNIGHT DELIVERY

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of PECO Energy Company for Approval of its Smart Meter
Technology Procurement and Installation Plan, Docket No. M-2009-2123944**

Dear Secretary Chiavetta:

Enclosed please find the original and three copies of the Comments of PECO Energy Company in Response to the Commission's Order Entered on May 6, 2010. As evidenced by the enclosed Certificate of Service, copies of the Comments have been served upon all parties of record, Administrative Law Judge Marlane R. Chestnut, and the Director of the Commission's Office of Special Assistants.

An additional copy of this letter and PECO's Comments are enclosed, which we request be date-stamped and returned to us in the envelope provided.

Sincerely,



Anthony E. Gay

Enclosures

cc: Per Certificate of Service

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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MAY 17 2010

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
SMART METER TECHNOLOGY : DOCKET NO. M-2009-2123944
PROCUREMENT AND INSTALLATION :
PLAN :

**COMMENTS OF PECO ENERGY COMPANY IN RESPONSE TO THE
COMMISSION'S ORDER ENTERED MAY 6, 2010**

Pursuant to the May 6, 2010 Opinion and Order entered by the Pennsylvania Public Utility Commission (the "Commission") in the above-referenced docket, PECO Energy Company ("PECO") hereby submits comments regarding: (1) the adequacy of PECO's current interval usage data processes; and (2) the appropriateness of requiring PECO to implement electronic data interchange ("EDI") Historical Interval Usage ("HIU") protocols.

I. INTRODUCTION

PECO appreciates this opportunity to clarify its current capability to provide customers and third parties with historical interval data during the 30-month grace period as well as its efforts to develop effective smart meter data transactions that are consistent with the Commission's Implementation Order. *See Smart Meter Procurement and Installation*, Docket No. M-2009-2092655 (Order entered June 24, 2009) ("Implementation Order"). As discussed below, PECO believes that its current processes for providing historical interval data are effective and adequate for the grace period. Under the current processes, (1) if a customer has provided authorization to PECO to release its information to all suppliers, then PECO automatically processes an EGS's EDI Historical Interval Usage request by posting the requested data to the PECO "SUCCESS" EGS website for download by the requesting EGS or (2) if the customer has only authorized the release of its information to a specific supplier (that is, through a Letter of Customer Authorization ("LOA")), PECO manually processes the request by sending

an email to the requesting EGS, thus ensuring that the customer's request not to disclose its information to other EGSs is honored.

PECO is also engaged in an inclusive and timely effort to explore and develop further appropriate smart meter data exchange methods and standards, including standards related to historical interval data, through its active participation in the Commission's Electronic Data Exchange Working Group ("EDEWG"). The EDEWG has concluded that alternatives to the EDI HIU protocols should be explored, and PECO believes that the Commission should not bypass the EDEWG standards development process by requiring PECO to implement EDI HIU protocols at this time.¹

II. SPECIFIC COMMENTS

A. Adequacy and Timeliness of PECO's Current Interval Usage Data Processes

Consistent with the Implementation Order, during the 30-month grace period, PECO will be able to provide direct access to a customer's historical interval data to third-parties, such as electric generation suppliers ("EGSs"), upon customer request. *See* Implementation Order, p. 7; PECO's Smart Meter Technology Procurement and Installation Plan ("Smart Meter Plan"), § 5.8. PECO already has processes in place to provide historical interval data, processes that have been used successfully by PECO and EGSs since 1999. Provision of customer data to EGSs through the web facilitated choice in the PECO territory when market generation rates were at or below PECO's generation rate cap. Indeed, as of July 1, 1999, 57.7% of industrial customers and 24.95% of commercial customers were served by a supplier other than PECO.²

¹ On page 25 of the Implementation Order, the Commission directed, *inter alia*, that this issue be addressed by the EDEWG.

² Pennsylvania Office of the Consumer Advocate, July 2, 1999 (www.OCA.state.pa.us).

Currently, PECO will use one of two processes to provide historical interval data, depending on whether an interval-metered customer has given PECO permission to “release all customer account and usage information.”³ First, an EGS will send a request for historical interval data to PECO via an EDI transaction. If a customer has provided the authorization for PECO to release its information to all suppliers, PECO’s systems automatically process the request by posting the requested historical interval usage data to the PECO “SUCCESS” EGS website for download by the EGS. If a customer has not authorized the release of its information broadly, the EGS must provide PECO with a Letter of Customer Authorization (“LOA”) and PECO will then manually process the request and provide the historical interval data via e-mail to the EGS. This process is more expensive and time consuming because it must be done manually.

PECO believes these processes comply with the Implementation Order’s requirements concerning access to historical interval data during the grace period,⁴ and that they have worked well to facilitate EGS access to data. However, the Company understands, based on participation in recent Commission staff-led working group meetings, that there is interest in enabling all automatic EDI usage request functions based solely upon EGS representations regarding customers’ release-of-information preference and without any verification of customer preference by PECO. Under this scenario, the EGS must verify that either the customer has agreed to release usage data to all suppliers or that the EGS has in hand the customer’s LOA prior to making an EDI request to PECO. Should the Commission decide to implement this

³ A customer’s release-of-information preference is determined at the account level, and can therefore impact the release of both gas and electric account information.

⁴ In the Implementation Order, the Commission stated “during this grace period, the Commission will require EDCs to provide interval data capable meters ... and direct access to the customer’s interval data to third-parties, such as EGSs or CSPs, upon customer request.” Implementation Order, p. 7. As noted above, PECO already has processes in place to provide this data to EGSs.

policy, PECO would be amenable to implementing this process change, as it would avoid many of the Company's concerns with the EDI HIU protocols, which are discussed in detail in the following section.

B. Appropriateness of Requiring PECO to Implement EDI HIU Protocols

In the Implementation Order, the Commission identifies several types of data transactions necessary "to achieve the capabilities of smart meter technology" as well as the appropriate venue for developing those transactions. Implementation Order, p. 25. One key type of data transaction relates to providing meter-level HIU data to customers and their designated agents. *Id.* The Commission assigned the development of this and other important transactions to the Commission's EDEWG, which is comprised of electric distribution companies ("EDCs"), EGSs, and other interested parties. *Id.* ("These and other developments necessary for the implementation of smart meter technology plans require EDC and third-party participation in the Commission's [EDEWG]"). In particular, EDCs were directed to propose EDI capabilities for the purposes identified in the Implementation Order through the EDEWG for Commission review no later than January 1, 2010. *Id.*

As directed by the Implementation Order, PECO actively participated in the EDEWG sub-team tasked with developing smart meter data transactions. In addition, during PECO's Smart Meter Proceeding, the Company made clear that it intended to work through the EDEWG to address the data transaction requirements in the Implementation Order. *See, e.g.*, PECO Statement No. 2-R, Rebuttal Testimony of Glenn Pritchard, p. 14 ("The EDEWG is the appropriate forum within which to address [EDI protocols and data access issues] since they require industry standards developed after thorough consideration of EDC and EGS capabilities."). PECO also budgeted over a year for the development of EDI transactions in the

implementation timeline appended to its Smart Meter Plan. *See* Smart Meter Plan, Appendix 1, “Web, Data Analytics, EDI.”

On December 11, 2009, the EDEWG submitted its Preliminary Proposal for the Development of Smart Meter Data Exchange Standards (“Preliminary Proposal”) to the Commission. *See* Attachment A. In the Preliminary Proposal, *the EDEWG concluded that using EDI may not be the most effective or cost-efficient means of delivering historic smart meter data, particularly if doing so at the meter rather than the account level, and requested additional time to explore alternative options:*

Regarding the need for a new historical interval usage transaction to provide customers and their agents with 12 months of interval usage data at the meter level, the existing 867 Historical Interval Usage (HIU) transaction is already designed to meet this need. It should be noted that this transaction is currently optional and used only by PPL. PPL’s use of this transaction is intentionally limited to account level data. PPL’s experience with the 867 HIU transaction has revealed that the volume of data involved can be problematic. PPL acknowledged that other states have attempted to use the 867 HIU transaction to provide meter level data and failed. In an attempt to place an order of magnitude on the potential volume, the Sub-Team calculated that for a single meter providing 15-minute interval reads, 34,560 reads would be included in a 12-month 867 HIU transaction as compared to 12 reads for a non-AMI, manually read register meter over the same period. Therefore, the Sub-Team concluded that rather than establishing the 867 HIU transaction as the standard at this time, it would like to explore other methods for providing historical interval usage data at the meter level, including, but not limited to web presentment or other internet delivery approaches.

See Attachment A, p. 5. The EDEWG anticipates that it will finalize recommended smart meter data exchange standards by the end of January 2011, which would provide PECO with sufficient time to implement EDEWG’s selected method for providing historical interval data at the meter level by the end of the 30-month grace period. *See* Attachment A, p. 8.

PECO continues to believe that the EDEWG process is the appropriate venue for developing the smart meter data transactions required by the Implementation Order. If the Commission requires PECO to implement EDI HIU protocols, it would essentially be bypassing the standards development process it established in the Implementation Order and as a result would be requiring the Company to engage in costly systems modification and EGS testing without agreement from other stakeholders in Pennsylvania on an appropriate method of standardization. Particularly in light of the EDEWG concerns about EDI HIU protocols, it would be economically inefficient for PECO (and its customers) to make the investment to move from PECO's current process for providing historical interval data to the use of the EDI HIU transaction if that transaction will only serve as a transitional or interim solution as more appropriate methods are developed through the EDEWG process. The more prudent course would be to first determine the long-term smart meter historical interval usage delivery mechanism, and then determine how to transition from PECO's current method of distributing interval usage information.

If the Commission decides to require the use of EDI HIU protocols, PECO believes that implementation should not be required until the end of the 30-month grace period, when full-scale smart meter deployment will begin in PECO's service territory. PECO also believes that the Company should be permitted to recover the costs associated with implementation of EDI HIU protocols in the same manner as it will recover other smart meter costs – that is, on a full and current basis through a smart meter surcharge to all distribution customers. The timeframe for development and implementation for any required EDI HIU protocol implementation is important because, during 2010 and early 2011 in particular, PECO has planned and will be

undertaking a considerable amount of systems work to implement a wide variety of high priority matters, including many items that will support retail electric choice:

- Default Service Plan Implementation
 - Refreshing customers' release of information ("ROI") preferences for data reported in the Eligible Customer List
 - Version upgrade and customization of "Retail Office", PECO's energy forecasting, scheduling and invoicing software package for electric choice and default generation supply
- Billing system changes to accommodate new default service customer classes
- System changes required to implement a revised Electric Purchase of Receivables Program
- Implementing a new EDI transaction, i.e, Advance Notice to Drop notification, that will assist EGSs in managing their supply portfolio
- Implementation of new load curves for monthly-metered customers, used for energy scheduling for EGS and default service load settlement with PJM
- Enhanced Budget Billing functionality
- Energy Efficiency and Conservation Plan Implementation (Act 129)
- Smart Meter Plan Implementation
 - Dynamic Pricing Options
 - Initial Smart Meter IT work
- Implementing a Web-based tool for customers to access their historic usage data
- Early Phase-In Program
- PECO.com website redesign
- Billing system changes for electric distribution and gas distribution rates

PECO understands that EGSs are interested in a variety of additional measures to support retail choice. However, many of these additional measures would require substantial changes to the design of upgrades PECO is already in the process of implementing, and the Company is concerned that imposing additional systems redesign and implementation work during the

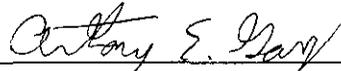
transition to the end of the rate cap period would put the successful execution of existing plans at risk.

It is important to note that PECO remains committed to taking appropriate steps to support retail electric competition, as reflected in the extensive number of projects already underway, and will continue to be an active participant in the EDEWG and other Commission working groups in order to identify sound and cost-effective strategies to address EGSs interests.

III. CONCLUSION

PECO appreciates the opportunity to comment on this important matter and firmly believes that the Company has adequate capability to provide customers and third parties with interval data during the 30-month grace period and is taking appropriate steps to develop effective smart meter data transactions for historical interval usage data through the Commission's EDEWG.

Respectfully submitted,



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May 17, 2010

For PECO Energy Company



December 11, 2009

James McNulty, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120

Dear Mr. McNulty:

In response to the Smart Meter Procurement and Installation Implementation Order at Docket No. M-2009-2092655, the Electronic Data Exchange Working Group ("EDEWVG") herein submits its Preliminary Proposal for the Development of Smart Meter Data Exchange Standards ("Preliminary Proposal").

The Preliminary Proposal was developed by an EDEWVG sub-team of EDCs consisting of West Penn Power Company d/b/a Allegheny Power ("Allegheny"); Duquesne Light Company ("Duquesne"); Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company (collectively "FirstEnergy"); PECO Energy Company ("PECO"); and PPL Electric Utilities Corporation ("PPL").

Once a draft version of the Preliminary Proposal was completed, it was published to the EDEWVG List Serve and subsequently reviewed and discussed at the December 3, 2009 EDEWVG meeting.

EDEWVG appreciates the support and commitment of its members and the Commission in developing and maintaining data exchange standards in the Commonwealth.

Sincerely,

George M. Behr
George M. Behr
EDEWVG EGS Co-chair
Energy Services Group, Inc

Patti Weiss
Patti Weiss
EDEWVG EDC Co-chair
Duquesne Light Company

Brandon Siegel
Brandon Siegel
EDEWVG Change Control Manager

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Preliminary Proposal for the Development of Smart Meter Data Exchange Standards

INTRODUCTION

In its Smart Meter Procurement and Installation Implementation Order at Docket No. M-2009-2092655, the Commission directs EDCs to propose EDI capabilities required to support the implementation of smart meter technology through the EDEWG for Commission review no later than January 1, 2010.

In order to fulfill this directive, an EDEWG sub-team ("Sub-Team") was formed. This sub-team of EDCs consisted of West Penn Power Company d/b/a Allegheny Power ("Allegheny"); Duquesne Light Company ("Duquesne"); Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company (collectively "FirstEnergy"); PECO Energy Company ("PECO"); and PPL Electric Utilities Corporation ("PPL").

Participants in the sub-team included:

Tom Graham (Allegheny)

Bill Bates (Duquesne)

Patti Weiss (Duquesne)

Lisa Herchick (FirstEnergy)

Matt D'Ulisse (PECO)

Glenn Pritchard (PECO)

Bob Theiller (PECO)

Donna Hirst (PPL)

Kim Wall (PPL)

Upon reviewing the Implementation Order, the Sub-Team concluded that the Commission is requesting data exchange standards for two (2) distinct categories of business processes. The first group is made up of current business processes and the second group is made up of new business processes that will develop as a result of implementing smart meter technology. This Preliminary Proposal addresses these two (2) groups in detail.

The Sub-Team also concluded that while the Commission recognized the complexity of designing and installing a smart meter network by establishing “a period of up to 30 months for each EDC to assess its needs, select technology, secure vendors, train personnel, install and test support equipment and establish a detailed meter deployment schedule” (“30-Month Grace Period”), it did not include the development of smart meter data exchange standards in the 30-Month Grace Period. The Commission instead directed that the EDCs propose such data exchange standards through the EDEWG for Commission review no later than January 1, 2010.

EDEWG Preliminary Working Document

GENERAL DESCRIPTION OF DATA EXCHANGE STANDARDS NECESSARY FOR SMART METERING

It is the consensus of the Sub-Team, that the data exchange standards requested for existing business processes are already defined. In some cases, the standards will require a small adjustment, such as being changed from optional to required (in whole or in part). But in all cases, there already exists a data exchange standard to meet the EDI requirements requested by the Implementation Order.

Data Exchange Standards for Current Business Processes

The Implementation Order states, "In order to achieve the capabilities of smart meter technology, however, EDCs are required to implement an EDI transaction relating to enrollment of customers who elect service on a real-time-price or time-of-use rate program, and a new historical interval usage transaction in order to provide customers and their designated agents with 12 months of interval usage data pursuant to Commission orders at Docket No. M-00960890E0015. Also, the historical usage data transaction must facilitate third-party exchange of historical interval usage data recorded at the meter level."

The Sub-Team agrees that EDI transactions are not required to establish customers in new rate programs, including real-time-price or time-of-use. EDCs can continue to utilize their existing processes to move customers into new rates as such actions are separate functions from the enrollment of customers with an EGS. The Sub-Team reviewed the existing 814 Enrollment Request transaction and reached consensus that the transaction, as currently defined, is capable of supporting the enrollment of customers with an EGS who are participating in a real-time-price or time-of-use program. This requirement can be satisfied under each of the three (3) billing scenarios currently supported in the Commonwealth— EDC Consolidated Billing/Rate-Ready, EDC Consolidated Billing/Bill-Ready and DUAL Billing. Each scenario is discussed below.

EDC Consolidated Billing/Rate-Ready

Under this scenario, the EDC reads the meter, calculates both the EDC and EGS charges and provides a consolidated bill to the customer.

In the event that a customer elected service on a real-time-price or time-of-use program, the EGS would use the existing 814 Enrollment transaction and specify a Rate-Ready rate code associated with the elected real-time-price or time-of-use program. This assumes that the EDC is capable of billing real-time-price and time-of-use rates on behalf of the supplier.

As noted in the EDEWG Sub-Team Report Regarding Rate-Ready Billing filed with the Commission on November 9, 2009 at Docket No. M-2009-2104271, it was the consensus of the Rate-Ready Sub-Team that Rate-Ready billing be kept simple and not require EDCs to provide complex billing structures like real-time-price and time-of-use programs for suppliers.

For EDCs that choose to provide these complex billing options, suppliers will be able to enroll the customers utilizing the appropriate Rate-Ready rate code.

For EDCs that do not provide these complex billing options, suppliers will be able to enroll the customers and calculate their own charges.

EDC Consolidated Billing/Bill-Ready

Under this scenario, the EDC reads the meter, the EDC and EGS each calculate their own charges and the EDC provides a consolidated bill to the customer.

In the event that a customer elected service on a real-time-price or time-of-use program, the EGS would use the existing 814 Enrollment transaction and specify that they will calculate their own charges to be consolidated with the bill produced by the EDC. The EGS will calculate their charges based on the appropriate real-time-price or time-of-use rates and provide a Bill-Ready EDI 810 transaction to the EDC. The EDC will use the Bill-Ready EDI 810 transaction from EGS to provide a single consolidated bill to the customer.

DUAL Billing

Under this scenario, the EDC reads the meter, the EDC and EGS each calculate their own charges and the EDC and EGS each provide a bill to the customer with their own charges.

In the event that a customer elected service on a real-time-price or time-of-use program, the EGS would use the existing 814 Enrollment transaction and specify that they will calculate and bill their own charges. The EGS will calculate their charges based on the appropriate real-time-price or time-of-use rates and provide separate bill to the customer.

Regarding the need for a new historical interval usage transaction to provide customers and their agents with 12 months of interval usage data at the meter level, the existing 867 Historical Interval Usage (HIU) transaction is already designed to meet this need. It should be noted that this transaction is currently optional and used only by PPL. PPL's use of this transaction is intentionally limited to account level data. PPL's experience with the 867 HIU transaction has revealed that the volume of data involved can be problematic. PPL acknowledged that other states have attempted to use the 867 HIU transaction to provide meter level data and failed. In an attempt to place an order of magnitude on the potential volume, the Sub-Team calculated that for a single meter providing 15-minute interval reads, 34,560 reads would be included in a 12-month 867 HIU transaction¹ as compared to 12 reads for a non-AMI, manually read register meter over the same period. Therefore, the Sub-Team concluded that rather than establishing the 867 HIU transaction as the standard at this time, it would like to explore other methods for providing historical interval usage data at the meter level, including, but not limited to web presentment or other internet delivery approaches.

The Implementation Order states, "An EDI transaction will also need to be developed and implemented for the exchange of monthly, billing quality, interval usage data recorded at the meter level versus the current practice of providing usage data at the account level."

The existing 867 Interval Usage transaction is already designed to meet this need. However, as noted by the Commission, some EDCs currently use this transaction to provide interval usage data at the account level. In its current form, this transaction defines providing meter level detail as optional. EDEWG will act to make meter level detail required for this transaction. Since this change may necessitate EDC modifications to their systems to support this level of data, the requirement will take effect for each EDC at the expiration of their respective 30-Month Grace Period. EDCs would require

¹ Calculated as 12 months x 30 days per month x 24 hours per day x 4 reads per hour x the number of meters.

testing this modification with EGSs and all other interested parties prior to implementation.

Data Exchange Standards for New Business Processes

The Implementation Order states, "These and other developments necessary for the implementation of smart meter technology plans require EDC and third-party participation in the Commission's Electronic Data Exchange Working Group ("EDEWG"). Therefore, EDCs are directed to propose EDI capabilities for this purpose through the EDEWG for Commission review no later than January 1, 2010. In developing these proposals, EDCs are encouraged to look at any applicable national standards, such as those developed by the North American Energy Standards Board. EDCs shall identify in their plans target dates for the testing and certification of these EDI transactions with their business partners in order to meet the smart metering implementation deadline as specified in this Order."

The Sub-Team views these "other developments" as the new business processes such as in-home device support, billing-quality data provided to customers/designated third-parties within 48 hours of meter reading and other processes that will come to be as a result of implementing smart meter technology. The Sub-Team has concluded that these new business processes are not yet fully defined. It is not possible for this Sub-Team to develop data exchange standards for undefined business processes.

For this reason, an extension of the Commission's January 1, 2010 deadline is requested. Once granted an extension, the Sub-Team proposes that it be expanded to include representation from all stakeholders. Specifically, the Sub-Team believes that it should be expanded to include representatives for the following groups: EGSs, CSPs, Service Providers and interested third parties.

The newly expanded EDEWG Smart Meter Sub-Team ("Expanded Sub-Team") will have the following mission:

1. Identify the business processes that will be needed to support smart meter technology.
2. Identify the data exchange requirements that will be needed to support the business processes.

3. Develop proposed data exchange standards to meet the data exchange requirements.

In fulfilling its mission, the Expanded Sub-Team will review and consider applicable national standards, such as those developed by the North American Energy Standards Board.

Essentially, the Expanded Sub-Team will identify what data needs to be exchanged and recommend standards for exchanging the required data.

The Sub-Team posits that as the EDCs work their way through their respective 30-Month Grace Periods and conduct a thorough analysis of smart meter implementation requirements, the related business processes and data exchange requirements will be identified. As smart meter business processes and data exchange requirements are identified, they should be submitted to the Expanded Sub-Team for review and development of supporting data exchange standards.

It is also expected that since the Expanded Sub-Team will be functioning in parallel with the EDCs' grace period efforts, the Expanded Sub-Team will identify some data exchange requirements that will be taken back to the EDCs and incorporated into their plans.

This symbiotic relationship between the EDCs and the Expanded Sub-Team will result in both business processes and data exchange standards that meet the needs of all stakeholders.

TIMELINE² FOR DEVELOPMENT OF SMART METER DATA EXCHANGE STANDARDS

Task	Completion Date
Distribute Draft Preliminary Proposal for the Development of Smart Meter Data Exchange Standards to the EDEWG List Serve for review.	11/25/2009
Discuss and finalize the Preliminary Proposal for the Development of Smart Meter Data Exchange Standards at regularly scheduled EDEWG meeting.	12/3/2009
File Transmittal Letter(s) and the Preliminary Proposal(s) for the Development of Smart Meter Data Exchange Standards with the Commission through EDEWG.	12/11/2009
Send request for volunteers to participate on the Expanded Sub-Team to the EDEWG List Serve.	12/11/2009
Make final request for volunteers to participate on the Expanded Sub-Team at regularly scheduled EDEWG meeting.	1/7/2010
Hold first of a series of Expanded Sub-Team meetings ³ .	1/12/2010
Obtain approval from Commission for Expanded Sub-Team and Proposed Timeline.	3/11/2010
Freeze requirements so that standards can be developed by target completion date. Changes to requirements after this date will be introduced through the EDEWG change control process.	9/1/2010 ⁴
Publish draft version of Smart Meter Data Exchange Standards.	11/30/2010
Publish final version of Smart Meter Data Exchange Standards.	1/31/2011

² This timeline assumes Commission approval of the Preliminary Proposal and individual EDC Smart Meter Plans as filed. Modifications to the Preliminary Proposal or Smart Meter Plans may impact the proposed completion dates.

³ The timeline shows the formation and commencement of the Expanded Sub-Team prior to receiving Commission approval in order to maximize the amount of time available to develop the necessary data exchange standards.

⁴ Originally PECO proposed a Freeze Date of 6/1/2010 followed by a Draft Date of 8/31/2010 and a Final Date of 10/30/2010. Not being comfortable that the requirements would be clearly defined in time to meet a Freeze Date of 6/1/2010, Duquesne countered with a Freeze Date of 12/31/2010 followed by a Draft Date of 3/31/2011 and a Final Date of 5/31/2011. These dates were agreed to by all EDC's except PECO who recommended a compromise of the dates in the timeline. These compromise dates were agreed to by all EDC's.

CONCLUSION

1. There is no need to modify the existing 814 Enrollment transaction. The transaction, in its current form, will support the requirements defined by the Implementation Order.
2. EDEWG will implement a change control to make meter level detail required for the 867 Interval Usage transaction. This requirement will take effect for each EDC at the expiration of their respective 30-Month Grace Period.
3. The Sub-Team requests that the Commission extend the January 1, 2010 deadline to allow for the formation of an Expanded Sub-Team that will be committed to the proposed timeline for the development of smart meter data exchange standards.
4. The Sub-Team requests that the Commission permit the Expanded Sub-Team to include in its scope of work a thorough exploration of alternatives to the 867 HIU transaction for providing historical interval usage data at the meter level so that a best practice can be determined and selected as the data exchange standard.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PECO ENERGY :
COMPANY FOR APPROVAL OF ITS :
SMART METER TECHNOLOGY : **DOCKET NO. M-2009-2123944**
PROCUREMENT AND INSTALLATION :
PLAN :

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the Comments of PECO Energy Company in Response to the Commission's Order Entered on May 6, 2010 on the following persons in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA FEDERAL EXPRESS

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Director
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VIA FIRST CLASS MAIL

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MAY 17 2010

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

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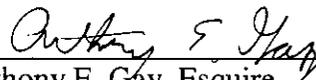
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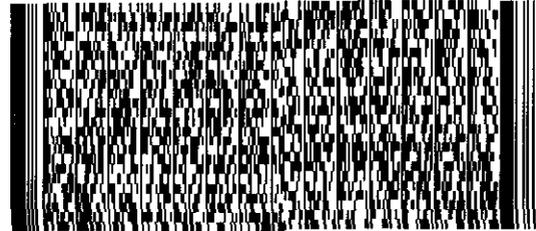
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