

**COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Smart Meter Procurement and Installation**

:

**Dockets No. M-2009-2092655**

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**COMMENTS OF THE  
ELECTRONIC DATA EXCHANGE WORKING GROUP (EDEWG) LEADERSHIP  
ON THE TENTATIVE ORDER ENTERED July 8<sup>th</sup> 2011**

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**I. BACKGROUND**

In 2009 an EDEWG subgroup was formed to create a preliminary proposal for the development of Smart Meter Data Exchange Standards (“Preliminary Proposal”) in Pennsylvania in response to the Commission’s Smart Meter Procurement and Installation Implementation Order (“Implementation Order”) entered June 24, 2009 at Docket No. M-2009-2092655. The Preliminary Proposal addressed two specific categories of business processes, 1) current business processes and 2) new business processes that will be develop as a result of EDCs implementing smart meter technology. Some of these new smart meter business processes are currently in a pilot phase under approved Electric Distribution Company “EDC” Smart Meter Plans.

It was the consensus of the EDEWG Sub-Team the data exchange standards requested by the Implementation Order 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. For example, EDI change control 85 related to identification of accounts with net metering was created to accommodate existing and future use special meter configuration data exchange in existing transactions.

**II. COMMENTS**

With that said, EDEWG Leadership respectfully seeks guidance and clarification from the Commission on the following issues, which have contributed to delays with EDEWG’s Smart Meter Sub-Group ability to identify and reach consensus on smart meter data exchange standards.

1) Historically, EDEWG has created and maintained data exchange standards for communication of customer data between EDCs and Electric Generation Suppliers "EGS". EDEWG has not developed or maintained standards for communication of customer data that occurs between EDC's and their customers directly. As specified in the Tentative Order entered June 30, 2011:

- *Required Functionality*

*EDEWG is to review each EDC's current smart meter plan for provision of the following required functionality:*

- a) *To provide customers with direct access to hourly usage and price information;*
- b) *To provide support for automatic control of a customer's electricity consumption by the customer, the utility or a customer's agent (at the discretion of the customer);*

Is it the Commission's intent to expand the purview of EDEWG to create and maintain data exchange standards for new smart meter business processes between EDCs and their customers? To date, the Sub-Group has been unable to establish standards around EDC to Customer communication since this is outside the traditional scope of the EDEWG.

2) Page 8 of the tentative order references the expanded scope of EDEWG (granted by the Implementation Order)

*"The Implementation Order clearly expanded the scope of EDEWG's focus to include new technology related to smart meter data access by customers and their designated third parties."*

EDEWG Leadership respectfully asks the Commission provide guidance and clarification with regard to integrating the expanded technological scope of the EDEWG with the separate EDC Smart Meter implementation plans previously approved by the Commission. EDEWG Leadership believes this will help remove barriers previously encountered in the sub-group when EDC representatives eager to move Smart Meter data access forward were not able to reach consensus as a result of conflicts with their respective EDC's approved smart meter plan.

- 3) With regard to the Required Functionality outlined on page 9 of the Tentative Order, EDEWG's Smart Meter Sub-Group has identified smart meter business processes for which standards cannot yet be defined as business processes and data available to market participants will not be fully known until pilot programs are completed under one or more approved EDC plans. Examples of these new business processes are: PPL EU's Voluntary Service Limiting (demand side management) and the Pre-Pay Pilot. It is the understanding of EDEWG Leadership that some EDCs are using the 30 month grace period to select their technology, while at the same time other EDCs are conducting pilots testing their selected technology. EDEWG Leadership submits once the EDC smart meter pilot programs for new business processes are complete, an expanded EDEWG Smart Meter Sub-Group inclusive of EDCs, EGS and other market participants can determine what data from these new business processes are relevant to add to existing transaction standards, or create new transaction standards to support these new smart meter business processes. Once these new standards are developed by EDEWG, and they are outside the scope of previously approved EDC Smart Meter Plans, is it the Commission's intent for EDCs to amend their previously approved smart meter plans?
- 4) With respect to Standardization Efforts on Page 9 of the Tentative Order, EDEWG is a volunteer organization whose membership consists of back office support staff from EDCs and EGSs active in the Pennsylvania Retail Electric Market. As such, EDEWG is confident it can provide descriptions and data exchange standards for newly defined business processes, however financial analysis of EDC's system and operational costs, or costs of a statewide solution would be beyond the expertise and resources of the volunteers at EDEWG.

### **III. CONCLUSION**

EDEWG Leadership appreciates this opportunity to submit comments on the Smart Meter Procurement and Installation Tentative Order and looks forward to continued discussions with all stakeholders regarding these

and other issues related to Smart Meter implementation. EDEWG is interested in the development of the Commonwealth's retail markets, for the benefit of Pennsylvania's consumers.

Respectfully submitted,

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On Behalf of Pennsylvania  
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