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FEDERAL EXPRESS

May 26, 2015

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

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**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 Ms. Chiavetta:

Enclosed for filing on behalf of PPL Electric Utilities Corporation ("PPL Electric") is an original of PPL Electric's comments in the above-captioned proceeding. These comments are being filed pursuant to the Order entered on April 23, 2015 in the above captioned proceeding.

Pursuant to 52 Pa. Code § 1.11, the enclosed document is to be deemed filed on May 26, 2015, which is the date it was deposited with an overnight delivery service.

Please date and timestamp the enclosed extra copy of this letter and return it to me in the envelope provided.

If you have any questions regarding these comments, please call me at (610) 774-4254 or Bethany Johnson – Manager, Regulatory Compliance at (610) 774-7011.

Very truly yours,

Paul E. Russell

Enclosures

cc: Tanya J. McCloskey, Esquire
Mr. John R. Evans
J. Edward Simms, 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 :
:

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PA PUBLIC UTILITY COMMISSION
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**COMMENTS OF
PPL ELECTRIC UTILITIES CORPORATION**

I. INTRODUCTION

PPL Electric Utilities Corporation ("PPL Electric") hereby submits these *comments in response to the Tentative Order issued by the Pennsylvania Public Utility Commission ("Commission") on April 23, 2015, at Docket No. M-2009-2092655. Submission of the Electronic Data Exchange Working Group's Web Portal Working Group's Solution Framework for Historical Interval Usage and Billing Quality Interval Usage, Docket No. M-2009-2092655 (Tentative Order entered April 23, 2015) ("Tentative Order").* Therein, the Commission considered the recommendations provided in the Electronic Data Exchange Working Group's ("EDEWG") Pennsylvania Web Portal Working Group Solution Framework ("Solution Framework")¹ regarding proposed standards for the development of Electric Distribution Company ("EDC") web

¹ See *Pennsylvania Web Portal Working Group Solution Framework*, Docket No. M-2009-2092655 (Received February 23, 2015).

portals to provide, in an efficient manner, customer metered data to all stakeholders² who have obtained customer consent regarding the release of the data.³

Following a review of the Solution Framework and feedback provided by the EGS community, the Commission's *Tentative Order* proposes that: (i) all EDCs with smart meters implement the Single User – Multiple Requests (“SU-MR”) functionality outlined in the Solution Framework within eight (8) months of the entry date of a Final Order in this proceeding;⁴ and (ii) all EDCs with smart meters implement the System-to-System (“StS”) functionality outlined in the Solution Framework within twelve (12) months of the entry date of a Final Order in this proceeding.⁵ The Commission's *Tentative Order* was served on all EDCs, and interested parties were directed to file written comments within 30 days of the entry date of the *Tentative Order*. In addition, in a Statement issued on April 23, 2015, Commissioner James H. Cawley identified several questions that he encouraged interested parties to address in their comments.

PPL Electric is a “public utility” and an “electric distribution company” as those terms are defined under the Public Utility Code, 66 Pa.C.S. §§ 102 and 2803, subject to the regulatory jurisdiction of the Commission. PPL Electric furnishes electric distribution, transmission, and provider of last resort electric supply services to

² Including, but not limited to, consumers, EDCs, licensed electric generation suppliers (“EGSs”), curtailment service providers (“CSPs”), and other third parties who have obtained customer consent regarding the release of the data. *Tentative Order*, p. 9.

³ Customers' historical interval usage (“HIU”) and billing quality interval use (“BQIU”) data are to be provided via the EDC web portal within 48 hours of daily meter reads. *Tentative Order*, p. 3.

⁴ According to the Solution Framework, the proposed SU-MR is a user-based platform allowing for an authorized user to manually log into the portal, request, and receive data for one individual account at a time. *Tentative Order*, p. 3.

⁵ According to the Solution Framework, the proposed StS is platform allowing an authorized user's information technology system to communicated directly with the web portal system of an EDC, without requiring the user to manually log into the web portal, and leverage the user interface. *Tentative Order*, p. 4.

approximately 1.4 million customers throughout its certificated service territory, which includes all or portions of twenty-nine counties and encompasses approximately 10,000 square miles in eastern and central Pennsylvania.

PPL Electric is and has been a strong supporter of both wholesale and retail electricity competition and the development of customer choice within Pennsylvania and on PPL Electric's system.⁶ PPL Electric has supported various Commission efforts to improve competition, including, but not limited to, accelerated switching and joint EDC/EDI bill. PPL Electric also was one of the first EDCs in the Commonwealth to fully deploy smart meters to all of its customers.

PPL Electric applauds the Commission's continued efforts to further promote retail electric competition in the Commonwealth by enabling customers to share their metered data efficiently with third parties who have obtained customer consent regarding the release of the data. PPL Electric appreciates the opportunity to provide comments to the *Tentative Order*. PPL Electric believes that its familiarity and experience with the retail competition and advanced metering technology will provide the Commission with a valuable perspective on the proposed standards for providing those entities that have obtained customer consent with metered data in an efficient manner.

PPL Electric believes that the SU-MR option and StS functionality are reasonable and appropriate standards that that will effectively take advantage of smart meter technology and will efficiently enable customers to share their metered data. PPL Electric therefore generally supports the implementation of the SU-MR option and StS

⁶ As of March 2015, approximately 71.7% of the total customer load on PPL Electric's system is served by EGSs.

functionality proposed in the *Tentative Order*. Implementing the SU-MR option and the StS functionality, however, will require modification to PPL Electric's systems. As explained below, PPL EU submits that standard implementation date for the SU-MR option and StS functionality be delayed to September 30, 2016 or 12 months after the entry date of a Final Order in this proceeding, whichever is later, or, alternatively, that the Final Order expressly provide that any EDC unable to comply with the standard implementation dates may file a petition seeking a waiver that explains the inability to comply and the estimated timeframe for full compliance.

II. COMMENTS TO TENTATIVE ORDER

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

The *Tentative Order* proposes that all EDCs with smart meters implement the SU-MR option. The *Tentative Order* describes the SU-MR option as follows:

Single User - Multiple Requests (SU-MR). 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.

Tentative Order, p. 3. The *Tentative Order* proposes that EDCs implement the SU-MR option within eight months of the entry date of a Final Order in this proceeding.

Tentative Order, p. 12.

PPL Electric generally agrees with and supports the use of the SU-MR methodology. As noted by the Commission, the use of the SU-MR option may be a beneficial tool for CSPs and smaller EGSs and may provide an interim methodology for large EGSs to obtain customer interval usage data until the StS functionality is fully implemented.

Currently, PPL Electric offers customer metered data to all licensed EGSs and CSPs, who have obtained customer consent regarding the release of the data, through an existing SU-MR option on the Company's Supplier Portal. The EDEWG's Solution Framework identifies the data elements that must be provided through the proposed SU-MR in response to account-level requests and meter-level requests.⁷ The Solution Framework also contemplates that all of the identified data elements will be combined and provided in response to a single account-level request or meter-level request.

PPL Electric's existing SU-MR option on the Company's Supplier Portal currently provides access to most of the data elements identified in the Solution Framework, but does not currently combine the data elements into a single response to an account-level request or meter-level request. Modifications to PPL Electric's existing Supplier Portal are required to attain full compliance with the standard data format for the SU-MR option. As explained below, PPL Electric believes that additional time is needed to fully implement the standard data format for the SU-MR option. Provided that EDCs are given sufficient time to implement the SU-MR option and are guaranteed full cost recovery, PPL Electric generally agrees with and supports the SU-MR option.

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

The *Tentative Order* proposes that all EDCs with smart meters implement the StS functionality. The *Tentative Order* describes the StS functionality as follows:

System-to-System (StS) – 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

⁷ See Footnote 1, pp. 8-12.

instance, this could involve the use of File Transfer Protocol, aka "FTP," or web services to transmit and satisfy requests.

Tentative Order, p. 4. The Tentative Order proposes that EDCs implement the StS functionality within twelve months of the entry date of a Final Order in this proceeding.

Tentative Order, p. 12.

PPL Electric generally agrees with and supports the use of the StS functionality. As noted by the Commission, the StS functionality will help maximize the benefits of smart meter technology and will facilitate providing those entities that have obtained customer consent with that customer's HIU and/or BQIU data in an efficient and timely fashion. PPL Electric believes that allowing an authorized user's information technology systems to communicate directly with a web portal system of the EDC, without requiring a user to manually log into the web portal itself, and the use of file transfer protocols or web services to satisfy the requests is beneficial.

PPL Electric's existing Supplier Portal does not offer StS functionality. Modifications to PPL Electric's existing Supplier Portal are required to design, implement, and test the StS functionality and the required data format. As explained below, PPL Electric believes that additional time is needed to fully implement the StS functionality. Provided that EDCs are given sufficient time to implement the StS functionality and are guaranteed full cost recovery, PPL Electric generally agrees with and supports the implementation of the StS functionality.

C. ACCESS TO EDC WEB PORTALS

In the Tentative Order, the Commission states that its intention in proposing the SU-MR option and StS functionality is to provide customer data to "all stakeholders, including, but not limited to, consumers, EDCs, licensed EGSs, CSPs, and other entities

who have obtained customer consent regarding the release of the data.” *Tentative Order*, p. 9 (emphasis added). The Commission also states that “[b]ecause of the increasing deployment of the smart meter technology over the next few years, we believe it appropriate for the EDCs to incorporate in that implementation the functionality necessary to provide customers, EGSs, CSPs and other entities who have acquired customer consent with the HIU and BQIU data garnered using smart meter technology.” *Tentative Order*, p. 11(emphasis added).

PPL Electric takes customer privacy and the requirements for Eligible Customer Lists very seriously. PPL Electric is concerned that the *Tentative Order* could be construed to mean that non-licensed entities should be permitted access to customer data through the EDCs’ web portals. Section 2.1.3 of the EDEWG Solution Framework only contemplates disclosing customer data to licensed EGSs and Broker/Marketers “who are subject to [Commission] audit for the same.”⁸ It is unclear to what extent the Commission would have jurisdiction to resolve disputes or issues related to non-licensed third parties seeking customer data through EDCs’ web portals. Further, EDCs should not be responsible or liable for policing whether non-licensed third parties have obtained customer consent for release of the customer data.

PPL Electric submits that allowing access only to licensed EGSs and Broker/Marketers is consistent with the consumer privacy standards mandated by this Commission. Therefore, PPL Electric respectfully recommends that access to the EDCs’ web portals be limited only to those EGS and Marketers/Brokers that hold a valid license from the Commission.

⁸ See Footnote 1, p. 7-8.

D. STANDARD IMPLEMENTATION DATE

In the *Tentative Order*, the Commission proposes that EDCs implement the SU-MR option within eight months of the entry date of a Final Order in this proceeding, and that EDCs implement the StS functionality within twelve months of the entry date of a Final Order in this proceeding. For the reasons explained below, PPL EU submits that standard implementation date for the SU-MR option and StS functionality be delayed to September 30, 2016 or 12 months after the entry date of a Final Order in this proceeding, whichever is later. Alternatively, the Final Order should expressly provide that any EDC unable to comply with the standard implementation dates may file a petition seeking a waiver that explains the inability to comply and the estimated timeframe for full compliance.

As explained above, PPL Electric currently offers a SU-MR option on the Company's existing Supplier Portal. PPL Electric has determined that modifications to PPL Electric's existing Supplier Portal are required to attain full compliance with the standard data format for the SU-MR option.

Unlike the SU-MR option, StS functionality currently is not offered by PPL Electric's existing Supplier Portal. PPL Electric has determined that significant modifications to PPL Electric's existing Supplier Portal are required to design, implement, and test the StS functionality for both the comprehensive data format and the rolling 10-day format.

PPL Electric's resources currently are fully deployed to design, implement, and test higher priority initiatives, including, but not limited to: development of metered account multiple off-cycle switching that must be implemented by July 31, 2015; development of non-metered account multiple off-cycle switching that must be

implemented by December 31, 2016; and development of Seamless Moves and Instant Connects that must be implemented by July 1, 2016.⁹ PPL Electric submits that implementing and testing the SU-MR option and StS functionality could conflict with the testing efforts required to implement the above-mentioned initiatives.

In addition, as part of its comprehensive Smart Meter Technology Procurement and Installation Plan pending before the Commission at Docket No. M-2014-2430781, PPL Electric is proposing to replace the existing Meter Data Management (“MDM”) system beginning in May 2016 through September 2016.¹⁰ The proposed timeline to fully implement the SU-MR option and StS functionality could conflict with the Smart Meter Plan.

To fully implement the SU-MR option under the *Tentative Order*, PPL Electric would have to modify its existing Supplier Portal within eight months from the date of a Final Order. To fully implement the StS functionality under the *Tentative Order*, PPL Electric would have to modify its existing Supplier Portal within twelve months from the

⁹ On February 15, 2013, the Commission entered a Final Order directing EDCs to develop and submit plans by the end of 2013 to implement Seamless Moves and Instant Connects by June 1, 2015. See *Investigation of Pennsylvania’s Retail Electricity Market: End State of Default Service*, at Docket No I-2011-2237952 (February 15, 2013). By Secretarial Letter dated August 13, 2014, the Commission provided EDCs with the option of delaying the development of Instant Connects and Seamless Moves if the EDC determines that developing these processes could hinder or delay the development of 3-business day supplier switching. On August 19, 2014, PPL Electric notified the Commission of its election to postpone its implementation of its Seamless Moves and Instant Connects. By Secretarial Letter dated March 20, 2015, EDCs were directed to file a revised plan to implement Seamless Moves and Instant Connects in their service territories by July 1, 2016. On April 20, 2015, PPL Electric filed a *Compliance Filing Plan for Implementing Seamless Moves and Instant Connects for Metered Accounts*, at Docket No. M-2014-2401103. As explained therein, PPL Electric will be able to fully implement Seamless Moves and Instant Connects for all metered accounts by July 1, 2016.

¹⁰ On June 30, 2014, PPL Electric filed a comprehensive Smart Meter Technology Procurement and Installation Plan with the Commission at Docket No. M-2014-2430781, which currently is pending before the Commission. If approved, PPL Electric will begin replacing its existing technology to read meters in 2015 with full deployment of new automated meters from 2017 through 2019. The Company’s new automated meter system will also require the replacement and installation of additional IT and related systems to provide automated meter technology to customers. The proposed Smart Meter Deployment Plan will provide a foundation to realize future customer and operational benefits.

date of a Final Order. The Supplier Portal currently interfaces with the soon-to-be replaced MDM system. The MDM system is scheduled to be replaced in its entirety between May 2016 through September 2016 as part of the Smart Meter Technology Procurement and Installation Plan. PPL Electric submits that it would not be reasonable to modify the existing Supplier Portal interface to the old MDM system that will soon be replaced by a new MDM system.

Given the current demands placed on PPL Electric's resources for other information technology initiatives and the fact that PPL Electric's existing MDM system will be replaced by September 2016, PPL Electric believes it is reasonably necessary and appropriate to delay the implementation of a fully compliant SU-MR option until September 30, 2016, or 12 months after entry of a Final Order in this proceeding, whichever is later. Alternatively, the Final Order should expressly provide that any EDC unable to comply with the standard implementation dates may file a petition seeking a waiver that explains the inability to comply and the estimated timeframe for full compliance.

During the interim period, PPL Electric will continue to offer customer metered data to all licensed EGSs and CSPs, who have obtained customer consent regarding the release of the data, through an existing SU-MR option on the Company's Supplier Portal. This data will continue to be provided within 48 hours of the daily meter reads.

III. RESPONSES TO COMMISSIONER CAWLEY'S QUESTIONS

1. *What are the implementation costs for the SU-MR option, as well as the StS solution?*

Costs incurred to date incurred for the existing Supplier Portal are \$600,000. PPL Electric estimates that the cost to design, fully implement, and test the SU-MR option is approximately \$50,000. PPL Electric estimates that the cost to design, fully implement, and test the StS functionality is approximately \$50,000. PPL Electric proposes that EDCs be permitted to claim and seek recovery of these in their next future base rate case or the Competitive Enhancement Rider.

2. *Assuming the StS functionality is to be implemented, what are the incremental costs of the SU-MR option? In other words, are the implementation costs for the SU-MR solutions reduced if the StS solution is implemented?*

For purposes of PPL Electric's Supplier Portal, the modifications necessary to fully implement the SU-MR option and the StS functionality are not related. As a result, the implementation costs for the SU-MR option on PPL Electric's Supplier Portal will not be reduced if the StS functionality is implemented.

3. *Can the Green Button solution serve as an effective substitute for the SU-MR option?*

PPL Electric submits that the Green Button solution does not serve as an effective substitute for the SU-MR option. The Web Portal Working Group explored the use of Green Button solution. The Green Button is in XML format, and does not contain the data elements that were defined in the Solution Framework.

4. *If the Green Button solution is currently not an effective substitute, can its functionality or access limits be modified, and at what cost to make it suitable for this purpose?*

Although the Green Button solution is a national standard, it would need to be totally revamped and modified to meet the needs defined in the Solution Framework. PPL Electric submits that it would likely be more expensive to modify the Green Button solution than to implement a ground-up approach having the requirements defined in the Solution Framework.

5. *Is it practical for all system users to use the StS solution, or is this more costly and burdensome than the SU-MR solution for lower data volume users?*

PPL Electric believes that it may not be practical for the lower data volume users to undertake the investment necessary to acquire or design the systems necessary to perform a StS data retrieval program. PPL Electric submits, however, that the StS functionality will be beneficial to larger (higher data volume) EGSs that have robust information technology systems.

6. *What other standards are appropriate for this working group to establish in order to assure that a consistent solution is developed across all EDCs?*

PPL Electric notes that EDCs and Stakeholders involved in the Web Portal Working Group have agreed to a specific output format.¹¹ However, EDCs may have different security guidelines around infrastructures, protocols, authentication, authorization, and access controls which could influence consistency. Many of these

¹¹ See Footnote 1, pp. 8-12.

issues will be unique to and different on each of the individual EDC's systems. Given the diverse limitations/capabilities of the EDC's systems, PPL Electric submits that it is reasonable and appropriate for EDCs to work through these issues during the implementation and testing stage for both the SU-MR option and the StS functionality.

IV. CONCLUSION

PPL Electric appreciates the opportunity to provide comments to the *Tentative Order*. For the reasons explained above, PPL Electric generally supports the proposals in the *Tentative Order*, but respectfully requests that the Pennsylvania Public Utility Commission modify its implementation dates consistent with these comments.

Respectfully submitted,



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Date: May 26, 2015

Attorney for PPL Electric Utilities Corporation

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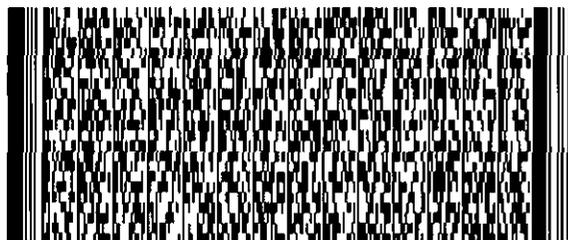


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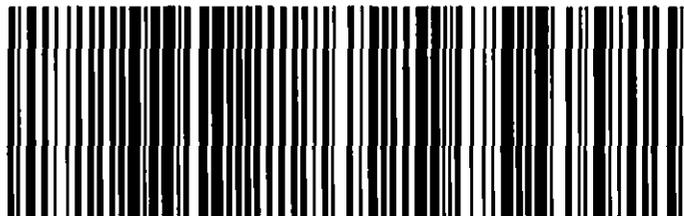
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