



NRG Retail Northeast
3711 Market Street
Philadelphia, PA 19104

May 9, 2016

FEDERAL EXPRESS

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Electronic Data Exchange Work Group (EDEWG) - Web Portal
Work Group Report – Docket No. M-2009-2092655**

Dear Secretary Chiavetta:

On April 7, 2016, the Electronic Data Exchange Work Group (“EDEWG”) filed a report with the Public Utility Commission (“PUC” or “Commission”) in response to the PUC’s September 3, 2015 Final Order directing EDEWG to develop an expanded standardized solution for the acquisition of historical interval usage (“HIU”) and billing quality interval usage (“BQIU”) data via a secure web portal that includes both a Single User Multiple Request Solution, as well as System-to-System (“StS”) functionality. The EDEWG report provides three separate technical standards documents developed by the Web Portal Working Group (“WPWG”) for the Commission’s consideration. The NRG Retail Affiliates (“NRG Retail”) participated in the WPWG discussions, and submit this letter in support of report and to highlight and reinforce one of the report’s recommendations.¹

NRG Retail appreciates all of the efforts of the WPWG to date and largely supports the EDEWG recommendations. However, the WPWG recommends that the EDCs pursue implementation of the StS Rolling 10-day solution either before or during implementation of the System-to-System Historical Interval Usage (“StS-HIU”) solution. NRG Retail urges the Commission to direct that the implementation of the StS Rolling 10-day solution be implemented *prior* to implementation of the StS-HIU solution.

¹ NRG Retail Affiliates include Reliant Energy Northeast LLC d/b/a NRG Home, Green Mountain Energy Company and Energy Plus Holdings LLC.

As the Commission is aware, NRG Retail is eager to deliver innovative products and services to its Pennsylvania customers that leverage the interval meter data available from the smart meters deployed by the electric distribution companies (“EDCs”). Our ability to deliver the product innovations that empower consumers to take control of their energy consumption hinges on timely access to our customers’ near real-time interval usage (“IU”) data every single day.

NRG Retail offered the StS Rolling 10-day solution during the work group process as a simple and easy to implement solution that will provide the data access EGSs need to deploy innovative products and services that leverage their customers’ IU data on a large scale. This solution requires the EDCs to provide flat files (or “Batch CSV files”) for each EGS that includes all of the 48 hour (or less) IU data for all of the customers being served by the EGS. The data files could be provided to EGSs via the EDCs existing secure supplier portals.

EGSs need access to this data as soon as possible, as it will take time to bring new products and services that leverage this data to market. EGSs must (1) become familiar with and analyze the data, (2) design and program the systems needed to capture, store, analyze, and push that data to customers in real-time, and (3) develop, test, market and deliver new products that leverage that data to customers. The longer retail suppliers must wait to gain access to this data, the longer it will be before the innovative solutions that the Commission anticipates will be available to customers.

I appreciate the opportunity to share NRG Retail’s perspective on the EDEWG’s Web Portal Work Group report. Please feel free to contact me at 301.509.1508 or via email at lgibbons@nrg.com if you have any questions or require additional information.

Sincerely,

A handwritten signature in black ink that reads "Leah Gibbons". The signature is written in a cursive, flowing style.

Leah Gibbons
Director, Regulatory Affairs

Electronic CC:
Office of Competitive Market Oversight