



**NRG Energy, Inc.**  
3711 Market Street, 10<sup>th</sup> Floor  
Philadelphia, PA 19104

May 5, 2022

**e-filed**

Ms. Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
2nd Floor, Room-N201  
Harrisburg, PA 17120

**Re: Docket No. M 2021-3029018, Investigation into Conservation Service Provider and Other Third Party Access to Electric Distribution Company Customer Data**

Dear Secretary Chiavetta:

In response to the Secretarial Letter dated February 8, 2022, seeking comments in response to questions related to the provision of interval usage data access to conservation service providers and other third parties, enclosed please find the comments of NRG Energy, Inc.

Please feel free to contact me at 301.509.1508 or via Email at [lgibbons@nrg.com](mailto:lgibbons@nrg.com) if you have any questions or require additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Leah Gibbons".

Leah Gibbons  
Senior Director, Regulatory Affairs

Enclosure

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Investigation into Conservation	:	
Service Provider and Other Third	:	Docket No. M-2021-3029018
Party Access to Electric Distribution	:	
Company Customer Data	:	

---

**COMMENTS OF NRG ENERGY, INC.**

---

**Introduction**

On February 8, 2022, the Public Utility Commission (“PUC” or “Commission”) issued a Secretarial Letter initiating this proceeding to “review potential avenues for Conservation Service Providers (“CSPs”) and other third parties to obtain scalable and secure usage data, whether through EDI, the EDC web portals, or some other electronic form”.<sup>1</sup> The Commission is seeking to determine “if a safe, acceptable path exists for CSPs and other third parties to gain access to customer data electronically from the EDCs”.<sup>2</sup> The Commission posed a series of questions and invited interested parties to file comments 45 days after the notice was published in the *Pennsylvania Bulletin*. The Commission indicated that the list of questions is not intended to limit the information commenters may furnish and invited parties to submit additional questions or any other information that they deem relevant.

NRG Energy, Inc. (“NRG”) appreciates the opportunity to provide the Commission with its perspective on smart meter data access in the Commonwealth, and to offer suggestions for improvement to the data access currently utilized by competitive electric generation suppliers (“EGSs”) that will enable further innovation by CSPs and EGSs for the benefit of Pennsylvania consumers.

---

<sup>1</sup> Secretarial Letter, *Investigation into Conservation Service Provider and Other Third Party Access to Electric Distribution Company Customer Data*, Docket No. M-2021-3029018, February 8, 2022.

<sup>2</sup> *Ibid.*

As discussed in more detail below, NRG recommends that the PUC direct the utilities to:

- Provide interval usage data in 15-minute increments.
- Require EDCs to provide access to customers' interval usage data more quickly – within 24 hours.
- Require the EDCs to fulfill their obligation to provide EGSs with access to Historical Interval Usage (“HIU”) data via the Electronic Data Interchange (“EDI”) for accounts where meters are upgraded and where a full 12 months' worth of data has not been accumulated.

### **About NRG**

NRG is the leading integrated energy and home services company powered by our customer-focused strategy, strong balance sheet, and comprehensive sustainability framework. A Fortune 500 company, NRG brings the power of energy to millions of North American customers. Our family of brands help people, organizations and businesses achieve their goals by leveraging decades of market expertise to deliver tailored solutions. Working in concert, our dynamic multi-brand retail strategy coupled with supply risk-management forms a uniquely positioned, integrated competitive energy provider. Our retail brands serve more than six million customers across North America, including a significant share in Pennsylvania, so significant, in fact, that NRG's East Retail headquarters is located in Philadelphia, and we have a second corporate office in Pittsburgh. These and other locations in Pennsylvania serve as home base to almost 500 hundred NRG employees. NRG's subsidiaries include a CSP and several EGSs that are actively serving residential, commercial, industrial and institutional customers throughout Pennsylvania.<sup>3</sup>

### **Background**

NRG was an active participant in the Electronic Data Exchange Working Group's (EDEWG) Web Portal Working Group (WPWG) that developed and submitted its *Solution Framework for Historical Interval Usage and Billing Quality Interval Use Report* in February 2015.<sup>4</sup> In response

---

<sup>3</sup> NRG Curtailment Solutions, Inc., a subsidiary of NRG, is a registered CSP in Pennsylvania (Docket No. A-2017-2630375). As EGSs in Pennsylvania, NRG subsidiaries hold licenses as follows: Direct Energy Business, LLC – Docket No. A-11025; Direct Energy Business Marketing, LLC – Docket No. A-2013-2368464; Direct Energy Services, LLC – Docket No. A-110164; Energy Plus Holdings LLC – Docket No. A-2009-2139745; Gateway Energy Services Corporation – Docket No. A-200902137275; Independence Energy Group LLC d/b/a Cirro Energy – Docket No. A-2011-2262337; Reliant Energy Northeast LLC d/b/a NRG Home/NRG Business/NRG Retail Solutions – Docket No. A-2010-2192350; Green Mountain Energy Company – Docket No. A-2009-2139745; Stream Energy Pennsylvania, LLC – Docket No. A-2010-2181867; and XOOM Energy Pennsylvania, LLC – Docket No. A-2012-2283821.

<sup>4</sup> *Pennsylvania Web Portal Working Group Solution Framework*, Pennsylvania Electronic Data Exchange Working Group, PUC Docket No. M-2009-2092655, February 17, 2015.

to that report, the PUC issued a Final Order directing the Electric Distribution Companies (EDCs) with smart meter requirements to implement the Single User – Multiple Requests (SU-MR) Solution, as well as the System-to-System (StS) functionality outlined in the WPWG Report.<sup>5</sup> NRG developed and was a vocal proponent of the “Active EGS” Rolling 10-Day StS Solution (which has now been implemented by all of the EDCs), and we rely heavily on that solution to serve our Pennsylvania residential customers today. We also rely heavily on the HIU data provided through EDI to serve commercial, industrial and institutional customers.

In short, our consumption of the hourly interval usage data currently provided through the StS Solution and through EDI enables us to analyze and forecast our customers’ demand with more precision; to make price offers to prospective customers to meet their individual needs; and, to actively engage our customers on an ongoing basis. For example, our NRG Home brand provides weekly email summaries to its customers about their energy use over the prior week and offers tips on how to reduce the total bill. NRG Home also offers a Time of Use plan geared toward Pennsylvania Electric Vehicle (EV) owners. These are made possible by our access to our customers’ interval usage data.

## **Comments**

NRG supports enabling and enhancing data access for Conservation Services Providers. Indeed, in its Final Order establishing data access for EGSs, the Commission noted that, “we are providing for the ability of an EGS and/or a CSP to obtain customer usage information through the SU-MR and StS functionalities...”.<sup>6</sup> Below, NRG shares its comments on select queries included in the Secretarial Letter. Our feedback reflects our specific experience in Pennsylvania and other jurisdictions regarding data access for third party service providers.

In addition to the responses to select questions posed by the Commission, our comments focus on changes needed to improve how interval usage data is provided to CSPs and EGSs so that they may better serve their customers. Such improvements are essential to improving the customer energy purchasing experience to better align with consumer expectations.

### **1. Electric Distribution Company (EDC) Smart Meter Customer Data Access by CSPs and Other Third Parties Technical Concerns:**

---

<sup>5</sup> Final Order, *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, September 3, 2015.

<sup>6</sup> *Ibid*, at p. 14.

- a. *Is it possible to develop a path in which certain CSPs or other third parties are granted authorization to access EDC smart meter customer data electronically in a secure manner?*

In our experience, yes. NRG operates in multiple jurisdictions complying with a variety of access requirements. Based on this broad experience, utilities which maintain secure web portals with daily read/update functions provide the most use-friendly data access experience with the most accurate customer data in a timely matter. We note that in Pennsylvania, PPL Electric Utilities Corporation (“PPL”) provides this service and represents a reasonable approach to meet the needs of CSPs and their customers. Other utility systems may be limited to certain types of customers or meters which are not as conducive for conducting necessary data operations.

- h. *Should the EDCs require financial security instruments, such as bonds, to help protect data confidentiality? If yes, are rules required to implement these financial security requirements? Also, if yes, should there be different security thresholds required for different types of CSPs and other third parties? If no financial security should be required, please explain why not.*

In our experience, financial security instruments are not utilized in any other jurisdictions and are not necessary to protect data confidentiality. Data confidentiality can be adequately addressed in the prevailing tariffs and through provisions addressed in the customer contracts with the relevant CSPs.

- i. *What types of tools should be required to ensure that CSPs and other third parties accessing utility systems have access to help features, such as online trouble ticket systems or technical documentation, to enhance their customer experience? What other features may be necessary?*

In our experience, utilities can and do utilize online trouble ticket systems to support CSPs. We note PPL currently utilizes such a system with reasonable success. These systems allow the status of issues to be visibly tracked, and requests are responded to in a timely matter, in some instances within 24 hours. This kind of system is an effective tool in troubleshooting issues that may occur when gathering customer data from the utility.

## **2. EDC Smart Meter Data Access by CSPs and Other Third Parties Legal Concerns:**

- e. *How should a CSP or other third party obtain customer consent for access to data from EDC systems? Would the EDC determine if a CSP or other third party has obtained the proper customer authorization before customer data is provided? If yes, how? If no, please explain why not.*

NRG currently obtains customer consent for access to data through a Letter of Authorization (“LOA”). Each customer signs a LOA as part of their initial contract which allows NRG to request interval/usage/metering data from the EDC on behalf of the customer.

In our experience, an effective system for tracking customer consent for CSPs enables more efficient workflow. For example, EDCs that use such a system to access utility data on behalf of the customer should permit the CSP to attest that a LOA has been obtained or otherwise provide the document prior to obtaining access to the customer data. Once that process is completed, the EDC then creates an online data profile for that customer so that CSPs can directly access customer meter data. This method has proven to be effective and efficient for both EDCs and CSPs.

### **3. Utility Usage Data and Meter Access:**

- a. *What customer data should the utility share with CSPs and other third parties? Should different types of CSPs and other third parties have different access to customer data?*

The list of customer data for CSP is brief, but important for efficient and accurate operations. We believe that includes, at a minimum: hourly data; a customer’s PLC (Peak Load Contribution); and loss factors.

- c. *In what format should the data be given? Should the data from each EDC be in an identical format (similar to the Electronic Data Exchange Working Group web portal data)? What other technical standards should be applied to the data?*

Ideally the format of the data should be in hour ending, since that is how data is submitted to PJM. If that is not possible, the minimum standard should provide hourly data and clearly identified what format the data provided actually is. For example, if the data is hour ending it should be noted, and if the format of the data is updated or corrected that should also be clearly identified.

Whether EDCs use this or another approach to data access, key elements remain to have standardized formats for the data in a usable format and, upon standing up the process, relative ease of access—subject to the appropriate confidentiality provisions noted above—to enhance efficiency for the customer, CSP, and EDC.

- h. *What electronic access to customer meter data do CSPs, other third parties, and EGSS need from EDCs, that they currently do not have? Provide specific examples where these entities do not have such access currently, and provide examples, if available, of electronic transactions that can be adopted to facilitate access.*

CSPs primary need is access to interval data, PLCs, and loss factors. Access to customer data that goes back two (2) years is preferred since PJM Capacity Performance guidelines require “Delivery Year – 2” data for Winter Peak Load calculations.

Some EDCs currently use a manual email process enabling CSPs to request customer data. This process leads to lengthy turnaround times to gain access to the customer data, and time-consuming manual processes to gather the data for the EDCs, particularly since CSPs are often requesting data at a minimum twice a year per customer.

An online portal where CSPs can access timely and accurate customer data would be an ideal arrangement. While some EDCs do maintain an online portal, it is also imperative that the data on these online portals is accurate and clearly identified. If the data is estimated, unavailable, or corrected, it should be noted as such.

We are familiar with some instances where the utility has no designed electronic access to data for CSPs. In these scenarios, while the EDC may have information available through supplier services logins/portals, including PLCs, loss factors and interval data for many customers, but without access to those a CSP would need to request all info by email. They have a dedicated email address for CSP requests as opposed to an online portal with direct access.

## **6. Additional Concerns:**

*Please address any additional questions or raise any additional concerns you have regarding CSP or other third party access to EDC customer data systems.*

As noted above, modifications are needed to the existing data access mechanisms to improve how interval usage data is provided to EGSs and CSPs so that they may better serve their customers. Such improvements are essential to improving the customer energy purchasing experience to better align with consumer expectations. To that end, we offer two additional recommendations for the PUC’s consideration.

*Require EDCs to provide interval usage data in 15-minute increments.*

As the Commission is no doubt aware, smart meters measure and collect very granular energy usage data in increments ranging from one minute to an hour. The availability of more granular usage data – in 15-minute increments – is important for at least two key reasons.

First, more granular data in turn powers data analytics. It facilitates more accurate load profiling and forecasting, and it enables more precise customer segmentation and behavior analysis.

Second, more robust analytics spurs innovation and customized energy solutions that enable customers to take more control over both their energy usage and their energy budgets. Currently, most of the EDCs provide data at the hourly interval level, though at least one (PPL) makes 15-minute data (in addition to hourly data) available to EGSs. As technology continues to evolve and customer demands for information increase, EGSs require more granular data to fully understand and engage their customers and offer better products and pricing tailored to individual consumer needs. NRG urges the Commission to require the EDCs to provide 15-minute data through the same solutions currently available to EGSs – i.e., EDI and the supplier portal via the solutions that have already been deployed – “Active EGS” Rolling 10-Day StS Solution and SU-MR.

*Require EDCs to provide access to customers’ interval usage data within 24 hours instead of 48 hours.*

The “Active EGS” StS Solution provides EGSs with access to their own customers’ BQIU data. This data is typically 48 hours old and has gone through the EDC validation process. In its Smart meter Implementation Order, the PUC set a minimum standard of a 48-hour lag in the provision of customer data and noted that ideally, such information should be available within 24 hours.<sup>7</sup> NRG agrees that faster provision of interval usage data would be ideal.

Faster access to customers’ interval usage data enables EGSs to communicate information about a customer’s consumption to her as quickly as possible so that the customer is able to make a connection between her electricity usage and what she was doing during that time. Customers simply cannot remember what they did days after the fact – time is of the essence. Customers expect instant access to timely information in all aspects of their lives – from the number of steps they take in a day, to movies online, to the products and services that they buy. The older the interval data that is provided to consumers, the less valuable and useful it is in motivating them to act. Providing access to the data more quickly enables EGSs to meet those customer expectations. NRG urges the Commission to require that the EDCs reduce the

---

<sup>7</sup> See Smart Meter Procurement and Installation Implementation Order, at Docket No. M 2009 2092655 (Order entered June 24, 2009) (hereinafter Smart Meter Implementation Order), at page 23.



lag between receiving the data from the AMI meters to making it available to EGSs to the 24-hour period noted in the Commission's prior order.

## **Conclusion**

NRG appreciates the opportunity to share its perspective on facilitating interval usage data access for CSPs and other third parties, and with improving the EGS data access tools. We look forward to participating in any future proceeding to consider these issues.

Sincerely,

A handwritten signature in blue ink that reads "Leah Gibbons". The signature is written in a cursive style with a blue ink color.

Leah Gibbons  
Sr. Director Regulatory Affairs  
NRG Energy, Inc.  
3711 Market Street  
Suite 1000  
Philadelphia, PA 19104  
301.509.1508  
[lgibbons@nrg.com](mailto:lgibbons@nrg.com)

May 5, 2022