



July 10, 2026

Matthew Homsher, Secretary
Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**RE: Distributed Energy Resources Participation in Wholesale Markets, Chapter 57
Docket No. L-2023-3044115**

Dear Secretary Homsher,

The Keystone Energy Efficiency Alliance (KEEA) appreciates the opportunity to submit reply comments to the Pennsylvania Public Utility Commission (PUC) regarding the Notice of Proposed Rulemaking of the proposed addition of Subchapter P to Chapter 57 of Title 52 of the Pennsylvania Code.

KEEA is Pennsylvania's trade association for the energy efficiency industry. With our sister the Energy Efficiency Alliance of New Jersey, we represent 80 business members across Pennsylvania and New Jersey. Our mission is to champion energy efficiency as the foundation of a clean, just, and resilient energy economy.

KEEA, along with our affiliated 501(c)(3) non-profit organization, the Energy Efficiency Alliance (EEA), originally submitted comments to the Notice of Proposed Rulemaking on June 10, 2026. EEA's comments largely focused on issues relating to data exchange. KEEA's comments were broadly supportive of the balance of the proposed rules while raising concerns about the proposed cost recovery mechanism. We now file these reply comments to expand on the data exchange issue.

In the Notice of Proposed Rulemaking, the Commission proposes delegating the actual rulemaking regarding data access to the Electronic Data Exchange Working Group (EDEWG), which was established by the PUC in 1997 to develop a standard set of data transaction guidelines for the implementation of electric competition.

Since EDEWG's formation, improvements to both hardware and software used to facilitate data exchange between utilities, customers, and third parties have considerably increased the ability

of customers to share their data in innovative ways, and we recommend that the Commission look to any of the commercially available data exchange platforms on the market. In particular, we recommend that the Commission direct regulated electric utilities to utilize Green Button Connect My Data, which converts data into a format that is easily readable by third-party entities. We also therefore join in the similar recommendations found in the initial comments filed by Earthjustice, NRDC, UtilityAPI, and Voltus.

We also support the specific recommendations by Mission:data to import regulatory language under consideration in New Jersey and Maryland.¹ The language proposed by Mission:data in their initial comments is consistent with industry best practices regarding third-party data access, and would ensure both the security and privacy of customer data while also providing the basis for a thriving competitive market to develop.

Finally, if the Commission does see fit to delegate the development of data exchange protocols to EDEWG, we strongly recommend that the Commission establish a defined process for EDEWG to work under. Specifically, the Commission should take the following steps:

- The Commission should ensure that EDEWG has clear directions to guide EDEWG's deliberations. This should include requirements that EDEWG address customer privacy, data standardization, and third-party access.
- The Commission should ensure that EDEWG does not exclusively use traditional electronic data interchange (EDI) as a solution for data-sharing challenges. We join UtilityAPI on this point. While EDI may have been suitable for the technology of its time, the advent of modern data sharing technologies and the needs of the market necessitate that the utilities shift away from reliance on it when interfacing with third-parties.
- The Commission should mandate a robust stakeholder engagement process for EDEWG to follow. While the working group as currently constituted certainly has subject-matter expertise when it comes to traditional EDI, that expertise does not extend to what is needed to cover data sharing issues more broadly. In addition to the technical expertise needed, input should be sought from consumer advocates, industry groups, and the public more broadly to ensure that adequate viewpoints are represented during the process.
- The Commission should specify a timeline and clear deliverables for EDEWG to work on. Given the multi-year history of this docket and similar FERC Order 2222 deadlines, we believe that any proposed regulations be required to be submitted to the Commission within six months of the final order in this proceeding.

¹ Mission:data Comments, p. 27. <https://www.puc.pa.gov/pcdocs/1935684.pdf>.

We again thank the Commission for the opportunity to submit reply comments in this matter, and we look forward to continuing to engage with the Commission to ensure the development of a thriving DER market that serves all Pennsylvanians.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin L. Carpenter". The signature is stylized with a large, sweeping "J" and a long, horizontal stroke extending to the right.

Justin L. Carpenter, Esq.

Policy Counsel

Keystone Energy Efficiency Alliance