

March 23, 2015

VIA ELECTRONIC FILING

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

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

Dear Secretary Chiavetta:

In response to the Commission order issued December 5, 2012 in this docket the Electronic Data Exchange Working Group (EDEWG) filed a report on February 17, 2015, with the Public Utility Commission (“Commission”). In this report they provide their recommendations for a “solution framework” for a secure web portal solution that would permit third parties such as EGSs and CSPs to acquire both historical interval usage and billing quality interval data within 48 hours of daily meter reads.

WGL Energy Services, Inc. (WGL Energy Services) files these comments in opposition to aspects of EDEWG’s proposed “solution framework”. We agree with comments filed by NRG on March 13, 2015 that the EDEWG solution does not allow the market to deliver innovative products and services that engage and empower the Commonwealth’s electricity customers to take control of their energy consumption. Further, there exist in other markets solutions that would better serve the goal.

As such WGL Energy Services urges the Commission to:

1. Reject the “Single User – Multiple Requests (SU-MR)” sole solution.
2. Require the Electric Distribution Companies (EDCs) to implement an “Active EGS” solution such as the EDEWG-proposed “Active EGS” Rolling 10-Day no later than the third quarter of 2015.

“Single User – Multiple Requests (SU-MR)” solution is inadequate.

EDEWG's proposals section 2.2.3 states "an EGS may request account-level information for at least ten (10) customer accounts at a given time." Further section 2.2.6 states "above the minimal standard of 10 accounts, EDCs reserve the right to cap the maximum number of account numbers requested simultaneously at their discretion."

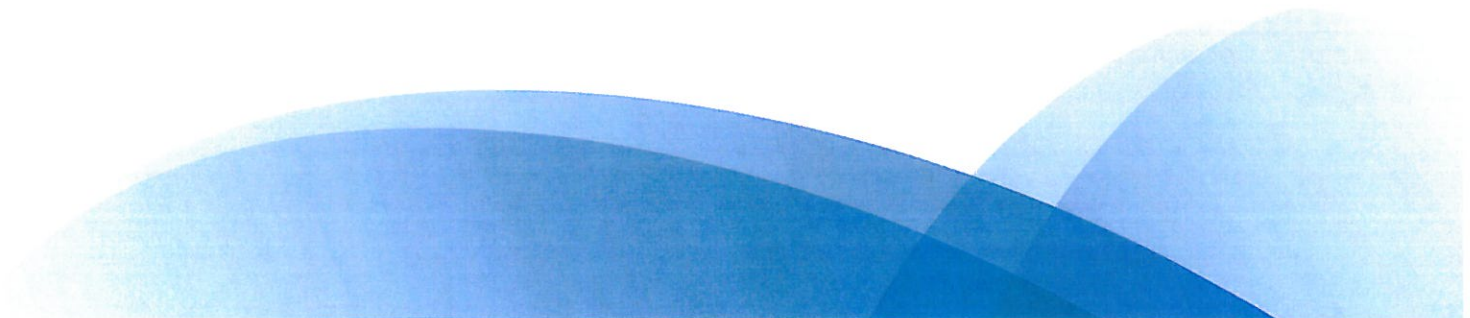
This manual process with the potential 10 accounts at-a-time limit is problematic to an EGS like WGL Energy Services that is serving many thousands of Commonwealth accounts. WGL Energy Services has already begun to roll out an Energy Management Platform that allows customers to visualize and analyze their usage and glean insights in potential strategies for improving their utilization of electricity. We would like to be able to offer access to 48 hr (or less) old Interval Usage data to all of the thousands of customers with access to the platform but would not be able to under the SU-MR solution.

WGL Energy Services would also note that the SU-MR functionality may have some utility for some users and, as such, does not object to the SU-MR functionality being required –however, we object if it is the *only* functionality required as it does not serve to allow the market to deliver innovative products and services that engage and empower the Commonwealth's electricity customers to take control of their energy consumption.

A solution such as the "Active EGS" Rolling 10-Day would meet EDC needs and has proven workable in other markets.

Unlike the SU-MR proposal, a solution such as the "Active EGS" Rolling 10-Day submitted as "Bulk Transfer Proposal 1" in EDEWG's February 17, 2015 report and supported by NRG in their March 13, 2015 letter, would allow EDCs the option to provide near-real-time data to a large numbers of customers. WGL Energy Services has had a positive experience with a similar system employed by the PHI Utilities and NRG has noted their experience with both the PHI Utilities and in Texas.

WGL Energy Services supports the "Active EGS" Rolling 10-Day solution or any solution that:



- a) allows an EGS to access quality interval data (no more than) 48 hours after metering for all of the customers it is serving,
- b) provides an efficient transfer mechanism which includes requiring no or only a very limited number of manual requests, and
- c) provides interval data on a rolling basis with at least 10 days of history available at any given time.

Therefore, because the Single User – Multiple Requests (SU-MR) does not support providing interval data to large numbers of accounts in an efficient manner that is necessary to allow the market to deliver innovative products and services that engage and empower the Commonwealth’s electricity customers to take control of their energy consumption and, there are workable alternatives that do, WGL Energy urges the Commission to:

1. Reject the “Single User – Multiple Requests (SU-MR)” sole solution.
2. Require the Electric Distribution Companies (EDCs) to implement an “Active EGS” solution such as the EDEWG-proposed “Active EGS” Rolling 10-Day no later than the third quarter of 2015.

WGL Energy Services appreciates the opportunity to provide these comments. If you have any questions you may contact me at 703-793-7562 or Phil Woodyard at 703-793-7560.

Sincerely,



Bernice K. McIntyre
Program Director, Regulatory Strategy
WGL Business Development and Non-utility Operations
WGL Energy Services, Inc.