|  |  |  |
| --- | --- | --- |
|  | **PENNSYLVANIA**  **PUBLIC UTILITY COMMISSION**  **Harrisburg, PA 17105-3265** |  |
|  |  |  |

|  |  |
| --- | --- |
|  | Public Meeting held April 23, 2015 |
| Commissioners Present: |  |

|  |  |
| --- | --- |
| Robert F. Powelson, Chairman | |
| John F. Coleman, Jr., Vice Chairman  James H. Cawley, Statement  Pamela A. Witmer | |
| Gladys M. Brown | |
|  | |
|  | |
| 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 | M-2009-2092655 |

# TENTATIVE ORDER

**BY THE COMMISSION:**

Before the Pennsylvania Public Utility Commission (Commission) is the joint recommendation from the Commission’s Bureau of Technical Utilities Services (TUS) and Office of Competitive Market Oversight (OCMO) regarding electric distribution company[[1]](#footnote-1) (EDC) development of a standardized solution for the acquisition of historical interval usage (HIU) and billing quality interval use (BQIU) data via a secure web portal. Based on the recommendations provided in the Electronic Data Exchange Working Group’s (EDEWG) *Pennsylvania Web Portal Working Group Solution Framework*[[2]](#footnote-2) regarding the intended standard(s) for the development of EDC web portals, as well as a review of the feedback on the Solution Framework provided by the parties noted herein, we propose that those EDCs with smart meter requirements implement, within eight months of the entry date of a Final Order on this proceeding, the Single User – Multiple Requests (SU-MR) option outlined in the Framework. Additionally, we propose that those EDCs with smart meter requirements implement, within twelve months of the entry date of a Final Order in this proceeding, the System-to-System (StS) functionality outlined in the Framework.

**BACKGROUND**

In our *Smart Meter Procurement and Installation Final Order, Smart Meter Procurement and Installation Final Order* at Docket No. M-2009-2092655 (Order entered December 6, 2012) (hereinafter Dec. 2012 Final Order), we directed EDEWG to convene a web portal working group (WPWG) to develop standardized solutions for third-party[[3]](#footnote-3) acquisition of a customer’s HIU and BQIU data via an EDC-provided, secure web portal.[[4]](#footnote-4) The Dec. 2012 Final Order required EDEWG to complete its development standards for the HIU solution by March 1, 2014, with the completion of its development standards for the BQIU solution by March 1, 2015. The Order only required the completion, not necessarily the implementation, of the solutions by these dates. *Id.* at 14.

The EDEWG leadership (Leadership), with the full support of the WPWG membership, filed on February 4, 2014, a request that the Commission modify the scope of the proposal so that both the HIU and BQIU standards may be filed no later than March 1, 2015.[[5]](#footnote-5) The WPWG asserted that many of the utilized processes, data and technology elements common to both required standards would be more efficiently synergized in generating these standards. This request was granted via a Secretarial Letter dated April 17, 2014, at the aforementioned docket.

On February 17, 2015, Leadership filed the Solution Framework. Leadership affirms that this document outlines the standards for a secure web portal solution that would permit third parties, such as electric generation suppliers (EGSs) and curtailment service providers (CSPs), to acquire both HIU and BQIU data within 48 hours of daily meter reads. Leadership further asserts that the document is a group consensus regarding the minimally-required standards for the required secure web portals.[[6]](#footnote-6)

Leadership maintains that the only non-consensus item from the WPWG is determining whether the implementation of a System-to-System (StS) solution by the EDCs should be mandatory or optional. In this regard, Leadership has requested that the Commission resolve this issue, as well as provide guidance for the implementation and timing of the consensus items.[[7]](#footnote-7)

In the Framework, the WPWG provides an overall request-response portal framework, with three basic options from which to choose:

1. **Single User - Single Request (SU-SR).** 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 via the portal’s user interface. The results could be rendered within the web portal interface itself or exported to the user in a predefined file format.
2. **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.
3. **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 instance, this could involve the use of File Transfer Protocol, aka “FTP,” or web services to transmit and satisfy requests.[[8]](#footnote-8)

After discussion, the WPWG agreed to focus on the SU-MR structure as the minimum required standard on which the deliverables should focus. However, some participants in later WPWG meetings voiced concerns regarding this approach and indicated a long-term preference for implementation of the StS structure.[[9]](#footnote-9)

EDEWG requested that the Commission approve the Solution Framework; provide guidance regarding its expectations for implementation of the solutions as part of smart meter implementation; and make a determination regarding the StS non-consensus issue.[[10]](#footnote-10)

The following parties filed letters for the Commission’s consideration during its review of the Solution Framework: Direct Energy; NRG Retail Affiliates, consisting of Reliant Northeast LLC d/b/a NRG Home, Green Mountain Energy Company and Energy Plus Holdings, LLC (NRG Retail); the Retail Energy Supply Association (RESA); and WGL Energy Services, Inc. (WGL).

**DISCUSSION**

**Comments**

NRG Retail urges the Commission to provide guidance to EDEWG and the EDCs regarding the development of a solution that will enable market participants to deliver innovative products and services. NRG Retail avers that the consensus solution in the Solution Framework will not meet this goal. NRG Retail Letter at 1. Specifically, NRG Retail requests that the Commission reject the SU-MR solution as being wholly insufficient; require the EDCs to implement the “Active EGS” Rolling 10-Day Solution[[11]](#footnote-11) no later than the third quarter of 2015; and determine whether the Simple Object Access Protocol Web Service (SOAP) Solution[[12]](#footnote-12) is adequate to meet the needs of CSPs before requiring its implementation. *Id.* at 2. NRG Retail states that an EGS’s ability to deliver innovative products and services requires timely access to its customers’ real-time interval usage data every day. NRG Retail believes that quick access to data allows EGSs to communicate with their customers regarding their consumption, enabling them to make behavioral changes as needed. The older the data, the less valuable and useful it is in motivating customers. *Ibid.*

NRG Retail avers that the SU-MR web portal, while perhaps acceptable as a minimal standard, is an inefficient use of resources and time for EDCs, EGSs and ratepayers. NRG Retail Letter at 4. Specifically, NRG Retail states that the manual nature of the SU-MR option requires users to request customer interval usage data one account at a time, a functionality that does not allow for the quick retrieval of data for EGSs with large numbers of customers. NRG Retail requests that such a methodology not be implemented as it does not empower Pennsylvania’s retail electricity customers. *Id. at* 4-5.

NRG Retail supports the “Active EGS” solution as it is a simple, easily implementable tool for providing large-scale amounts of customer data. NRG Retail Letter at 5. This solution involves the EDC provision of batch CSV files, including all of the 48-hour or less interval usage data for all the customers being served by the EGS. NRG Retail states that these files can be provided via the EDCs’ existing secure supplier portals, which require EDC-assigned usernames and the entrance of a password. *Ibid.* NRG Retail avers that the “Active EGS” solution is the only proposed solution from the Framework that will provide EGSs with quick and easy access to customers’ 48-hour interval usage data. This data is necessary for the development of innovative products and the realization of the full value of smart meters. Therefore, NRG Retail believes that the EDC implementation of the “Active EGS” solution, and not the SU-MR option, should be required. NRG Retail believes this should be done by the end of the third quarter of 2015. *Id.* at 6.

NRG Retail notes that the SOAP solution allows a user, such as an EGS or CSP, to require HIU data or 48-hour BQIU data one account at a time. NRG Retail Letter at 6. NRG Retail states that the SOAP solution automates the transaction, allowing the EGS or CSP systems to communicate directly with EDC systems. *Ibid.* However, the SOAP solution will not allow users to request or obtain interval usage data for all of their customers at one time like the “Active EGS” solution allows. *Id.* at 7. NRG Retail states that, while the SOAP solution is not beneficial to EGSs requiring data for large numbers of customers, it may be able to meet the needs of CSPs. Therefore, NRG Retail proposes that the Commission explore this solution further before mandating its implementation. *Ibid.*

Direct Energy, RESA and WGL agree with the NRG Retail Letter. Direct Energy Letter at 1; RESA Letter at 2; WGL Letter at 1. Specifically, all three parties urge the Commission to reject the SU-MR proposal and to require the implementation of the StS solution (*i.e.,* the “Active EGS” solution), which would require the EDCs to provide flat files of 48-hour BQIU data for all EGS customers. Direct Energy Letter at 1-2; RESA Letter at 2; WGL Letter at 1. RESA notes that the inability of EGSs to have timely and reliable access to customer data is a barrier in satisfying the demands of customers. RESA Letter at 3. WGL supports the “Active EGS” solution or any solution that allows EGS access to customers’ interval data; provides efficient transfers of such data with limited manual requests; and provides interval data on a rolling basis with at least ten days of historical data available at any given time. WGL Letter at 2-3.

**Commission Proposal**

Following our review of the Solution Framework and the feedback provided by the EGS community, this Commission believes clear direction must be provided regarding the standards for the development of EDC web portals and the provision of customer HIU and BQIU data, as well as any associated implementation timeframes.

The WPWG appears to have reached consensus that the SU-MR methodology outlined in the Framework could be the *minimum* standard for accessing customer data. The non-consensus issue within the Framework revolves around whether the StS Option (*i.e.,* the “Active EGS” solution) should be considered mandatory or optional.

In support of making StS optional, it was stated that the SU-MR methodology was an option regarding which consensus was reached and that early WPWG discussions on this topic reflected an understanding that web portal standards were minimum requirements, with StS as an optional component of the WPWG’s deliverables to EDEWG. Furthermore, some in the WPWG believed this decision was consistent with the language in both the Dec. 2012 Order and the associated WPWG charter.[[13]](#footnote-13) Also, it is believed by some in the WPWG that adding StS as a mandatory need at this time would represent an increase in scope to both the PUC mandate and the related WPWG charter, extending both schedule and resource requirements needed by the EDCs to meet the mandate as quickly and effectively as possible.[[14]](#footnote-14)

In support of making the StS Option mandatory, it was stated by some in the WPWG that StS is critical in enabling retail suppliers to deliver the innovative product and service offerings that, “as the Commission rightly recognizes,” will “empower electricity customers,” and must be implemented at the same time as the manual application program interface (API) solution.[[15]](#footnote-15) These WPWG members also state that retail suppliers’ ability to deliver product innovations that empower consumers hinges on *timely* access to their customers’ interval usage. In addition, some in the WPWG state that retail suppliers need access to all of their customers’ interval usage data every day and that the manual solution is unfeasible for suppliers with thousands of customers.[[16]](#footnote-16) Furthermore, some in the WPWG state that the Commission directed the working group to “develop a standardized solution for acquisition of interval usage data via a secure web-portal”[[17]](#footnote-17) and that nothing in the Commission’s Order suggests a preference for a manual versus StS approach to data acquisition.[[18]](#footnote-18) Additionally, the retail suppliers in the WPWG believe that it is the Commission’s intent to enable delivery of innovative product offers that empower electricity customers to take control of their electricity usage on a large scale.[[19]](#footnote-19)

We believe that the intention of our Dec. 2012 Final Order is fairly clear; however, we will resolve the apparent confusion revealed in the “consensus” framework advanced by the WPWG. We agree with the WPWG that our intention was to provide, in an efficient manner, customer HIU and BQIU data in order to empower 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. We would also like to clarify that only those entities with explicit customer permission, whether through the Eligible Customer Lists (ECLs), Letters of Authorization (LOAs), other direct contracts with the customer, etc., would be provided with the HIU and BQIU data. The Commission maintains that in order for the market to develop innovative products, this data must, with customer consent, be readily accessible to those parties outlined above.

With these goals in mind, we recognize that the SU-MR option may not be sufficient or efficient for large-scale suppliers. However, that does not mean it should be rejected, as suggested by those EGSs that filed letters in response to the Framework. We believe the SU-MR methodology may be beneficial for use by CSPs and smaller EGSs without the technological capabilities to perform StS transactions. Therefore, we propose the implementation of the SU-MR solution.

This Commission agrees with those EGSs that filed letters in response to the Framework that an StS methodology is necessary for inclusion in the web portal implementations. In order to maximize the benefits of smart meter technology, we believe that the EDCs should be providing those entities that have obtained customer consent with that customer’s HIU and/or BQIU data in an efficient and timely fashion. Clearly, the implementation of the StS option can meet these goals. Therefore, we propose that the StS option be mandatory for inclusion in EDC web portal implementations. When considering an StS Option, the Commission believes that any solution should be designed to scale efficiently with the volume of information from any increases in the number of smart meters or any additional deployments, such as the Batch CSV file solution provided in the Framework.[[20]](#footnote-20)

Two options have been presented to this Commission for its consideration in determining the implementation date for standards regarding the development of EDC web portals and the provision of HIU and BQIU data. The first option relates to the Dec. 2012 Final Order, which states that the EDCs shall propose the solutions formed within these EDEWG working groups as part of their smart meter implementation plans.[[21]](#footnote-21) The second option is to require all EDCs to meet a standard implementation date for their web portals.

Because this Commission believes this is an important issue, we think that a standard implementation date is necessary to ensure that the web portals are created in a timely manner with the functionalities necessary to provide HIU and BQIU data as directed. In our June 2009 Smart Meter Procurement and Installation Implementation Order, this Commission allowed for a grace period during which EDCs were not required to install a smart meter at a customer’s premises.[[22]](#footnote-22) However, we did require the EDCs to provide interval data capable meters, if the existing meter is not capable of providing interval data, allowing third parties, such as EGSs or CSPs, access to the customer’s interval data.[[23]](#footnote-23) Additionally, while we adopted in our Smart Meter Implementation Order, as a minimum standard, a 48-hour lag in the provision of customer data, we noted that, ideally, such information should be available within 24 hours.[[24]](#footnote-24) We are uncertain as to the ability of the SU-MR functionality to meet such a timeline, therefore increasing the need for the StS functionality.

Furthermore, in our Dec. 2012 Final Order, we explicitly stated that EDCs will, during pre-smart meter implementation, install the capability to share a minimum of 12 months’ historical interval account level or meter level usage data.[[25]](#footnote-25) The Dec. 2012 Final Order also directed the EDCs to post-smart meter implementation, enable interactions among all parties for communicating 12 months of HIU data on the meter and account level and provide meter or account level data as requested by the customer.[[26]](#footnote-26) We expressed a belief that the web portal would present a long-term solution for the sharing of BQIU data within 24 to 48 hours after the daily meter reads.[[27]](#footnote-27) The Commission also directed the EDCs to incorporate meter level interval usage data capabilities as part of smart meter implementation.[[28]](#footnote-28)

Based on these directives, we believe the need for the StS functionality is of a time-sensitive nature. It is this Commission’s understanding that multiple EDCs will reach nearly 100% smart meter deployment by the end of the 2016 calendar year, with other EDCs reaching nearly full deployment during the 2019 calendar year. Because 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.

Therefore, we propose that the EDCs implement the SU-MR option within eight months of the entry date of a Final Order on this proceeding. We believe the use of the SU-MR option is a necessary tool for CSPs and smaller EGSs and may provide an interim methodology for large EGSs to obtain customer interval usage data. However, as stated herein, we believe the end result must be the StS methodology. Due to the current smart meter deployment schedules, we believe the inclusion of this methodology in system upgrades within 12 months of the entry date of a Final Order on this proceeding to be reasonable. However, we request stakeholder feedback on these proposals, especially with regard to the proposed implementation timelines.

**CONCLUSION**

Upon full consideration of all matters of record, we propose that those electric distribution companies with smart meter requirements implement, within eight months of the entry date of a Final Order on this proceeding, the Single User – Multiple Requests (SU-MR) option. Additionally, we propose that the electric distribution companies with smart meter requirements implement, within 12 months of the entry date of a Final Order on this proceeding, the System-to-System (StS) functionality.

**THEREFORE,**

**IT IS ORDERED:**

1. That this Tentative Order shall be served on all Electric Distribution Companies, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate and all parties at Docket No. M-2009-2092655.

2. That interested parties shall have 30 days from the entry date of this Tentative Order to file written comments referencing Docket Number M-2009-2092655 with the Pennsylvania Public Utility Commission, Attention: Secretary, P.O. Box 3265, Harrisburg, PA 17105-3265. Comments may also be filed electronically through the Commission’s e-File System.

3. That a copy of this Tentative Order shall be posted on the Commission’s website at the Electronic Data Exchange Working Group’s web page - <http://www.puc.pa.gov/utility_industry/electricity/edewg_files_for_downloading.aspx>.

4. That the Commission’s Bureau of Technical Utility Services shall provide a copy of this Tentative Order to the Electronic Data Exchange Working Group.

5. That the Commission’s Office of Competitive Market Oversight shall provide an electronic copy of this Tentative Order to the Committee Handling Activities for Retail Growth in Electricity (CHARGE).

6. That the contact persons for technical issues related to this Tentative Order are Lee Yalcin, 717-787-6723 or [lyalcin@pa.gov](mailto:lyalcin@pa.gov), Jeff McCracken, 717-783-6163 or [jmccracken@pa.gov](mailto:jmccracken@pa.gov), and Megan Good, 717-425-7583 or [megagood@pa.gov](mailto:megagood@pa.gov). That the contact person for legal issues related to this Tentative Order is Kriss Brown, 717-787-4518 or [kribrown@pa.gov](mailto:kribrown@pa.gov).

 **BY THE COMMISSION,**

Rosemary Chiavetta

Secretary

(SEAL)

ORDER ADOPTED: April 23, 2015

ORDER ENTERED: April 23, 2015

1. These proposals apply only to those EDCs with smart meter technology requirements as outlined at 66 Pa. C.S. § 2807(f). [↑](#footnote-ref-1)
2. *See Pennsylvania Web Portal Working Group Solution Framework*, submitted by EDEWG, at Docket No. M-2009-2092655, received February 23, 2015 (hereinafter Solution Framework or Framework). [↑](#footnote-ref-2)
3. Third parties could include electric generation suppliers and customer-authorized third party entities. [↑](#footnote-ref-3)
4. *See* Dec. 2012 Final Order at pages 13-14. [↑](#footnote-ref-4)
5. *See* Letter from EDEWG, submitted February 4, 2014, at Docket No. M-2009-2092655. [↑](#footnote-ref-5)
6. *Id.* at cover letter. [↑](#footnote-ref-6)
7. *Ibid.* [↑](#footnote-ref-7)
8. *See* Solution Framework at 2-3. [↑](#footnote-ref-8)
9. *Id.* at 3. [↑](#footnote-ref-9)
10. *Id.*at cover letter. [↑](#footnote-ref-10)
11. *See* Solution Framework at 24. [↑](#footnote-ref-11)
12. *Id.* at 27. [↑](#footnote-ref-12)
13. Minutes from EDEWG and WPWG meetings, as well as the WPWG charter, are available on the Commission’s website at <http://www.puc.pa.gov/utility_industry/electricity/edewg_files_for_downloading.aspx>. [↑](#footnote-ref-13)
14. *See* Solution Framework at 35-36. [↑](#footnote-ref-14)
15. *Id.* at 36-37. [↑](#footnote-ref-15)
16. *Id.* at 37. [↑](#footnote-ref-16)
17. *See* Dec. 2012 Final Order at 13. [↑](#footnote-ref-17)
18. *See* Solution Framework at 37. [↑](#footnote-ref-18)
19. *Ibid*. [↑](#footnote-ref-19)
20. *Id.* at 16. [↑](#footnote-ref-20)
21. *See* Dec. 2012 Final Order at 14. [↑](#footnote-ref-21)
22. *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 7. [↑](#footnote-ref-22)
23. *Ibid.* [↑](#footnote-ref-23)
24. *Id.* at 23. [↑](#footnote-ref-24)
25. *See* Dec. 2012 Final Order at 13. [↑](#footnote-ref-25)
26. *Id.* at 13. [↑](#footnote-ref-26)
27. *Ibid.* [↑](#footnote-ref-27)
28. *Id.* at 17. [↑](#footnote-ref-28)