

EDC Account Number Retrieval in Pennsylvania's Retail Electricity Market

Feasibility Assessment Status Report-Out to CHARGE *(Pennsylvania Committee Handling Activities for Retail Growth in Electricity)*

Provided to Office of Competitive Market Oversight,
Pennsylvania Public Utility Commission, December 4, 2012

Precursor to session scheduled for December 13, 2012

Background

At the CHARGE meeting on July 26, 2012, members of the working group raised a new issue with respect to EGSs and utility account numbers for customers.

- EGSs currently cannot obtain utility account numbers for customers who are **NOT** on a utility's Eligible Customer List.
- This occurs when EGSs enroll customers at locations other than their homes and those customers do not have their utility bills or account numbers readily available. A customer in this situation may wish to authorize an EGS to obtain his or her utility account numbers from the respective utility.

PECO facilitated a Web Conference on Tuesday, August 21st, at 2:00 PM ET to gather perspectives from participants on overall visions for process implementation and subsequently provided the outcomes to CHARGE, including a detailed proposal provided by Green Mountain Energy. (*Appendix A includes Green Mountain Energy's proposal.*)

At the CHARGE meeting on November 1, 2012, the PUC OCMO requested that all EDCs evaluate Green Mountain Energy's proposal for technical feasibility and other factors necessary for implementation. Associated feedback is due to the PUC OCMO by December 3, 2012 in preparation for meaningful discussion at the next CHARGE meeting on December 13, 2012.

This report provides the current status of PECO's associated preliminary evaluation of Green Mountain's proposal as of December 4, 2012. PECO hopes to have cost estimates for the process above available for discussion at to the CHARGE meeting on December 13, 2012; However this information was not available at the time of this report publication.

Assumptions

- This process is only applicable to electric service. (Depending upon the implementation, extending this process to gas service would likely require additional cost and potentially impacts other utilities who do not currently participate in CHARGE. This is discussed in subsequent sections of this document.)
- The EDC reserves the right to take any actions reasonably believed to be necessary to detect, prevent, or otherwise address security or technical issues related to the process. (An example is provided in a subsequent section of this document.)
- In concurrence with Green Mountain Energy's proposal, PECO has no obligation to perform additional research on the customer or account if a single precise match is not

found for a given request. (This would be PECO's response to subsequent EGS requests for additional information.)

- EDCs would implement this process in response to a PUC order to do so and assumes that EDCs would be granted full and current cost recovery for associated costs.
- Given PECO's current workload of IT system-related market enhancement projects, implementation of this process, should it be ordered, would take place following approved work.

Risks

PECO is committed to protecting the privacy of its customers and preserving the integrity of Pennsylvania's competitive energy marketplace. As such, if PECO is required to implement this process, PECO will implement measures to ensure that a **PRECISE** match exists between the request submitted by an EGS and the response provided by PECO. This process must be sufficiently reliable to avoid releasing erroneous account numbers that are ultimately associated with customers different than those who authorized the EGS to retrieve their EDC account numbers. Otherwise, such a process could inherently increase the risk of EGSs inadvertently obtaining information for the incorrect customer.

Evaluation and Comments on Green Mountain Energy Proposal

PECO has evaluated Green Mountain Energy's detailed proposal and offers comments on each step below.

Step 1: Customer Authorization

Green Mountain Energy proposes the following:

- EGS obtains signed "Letter of Authorization" (LOA) in a PUC-approved format
- Eligible sales are limited to those involving customer interaction with an EGS agent or marketing representative at a location away from the customer's residence. Door-to-door sales are excluded.
- EGS is responsible for verifying the customer is not included on the EDC's Eligible Customer List before submitting a request to that EDC.

PECO agrees with all of the above and proposes the following additional points:

- EGS submission of a request serves as an acknowledgement to the EDC that the EGS possesses a valid LOA for the requested customer.
- An EGS is not required to provide documentation to the EDC that the EGS has received authorization of a customer to provide historical usage data to the EGS.
- The EGS is subject to audit by the Commission for compliance with customer authorization after the fact.

With regard to the sample LOA provided by Green Mountain Energy (see *Appendix B*), PECO observes that the LOA distributed to CHARGE is actually an enrollment authorization in which the customer is consenting to switch. Given that the stated purpose of authorization is limited to account number retrieval, PECO assumes that Green Mountain Energy will work with the Commission to establish a simpler LOA that is directly applicable to or directly references authorization for the EGS to retrieve the customer's EDC account number from the EDC.

PECO does not see technical feasibility evaluation as being applicable to this step.

Steps 2 & 3: EGS creates input report & submits to EDC via Secure FTP

Green Mountain Energy proposes the following:

- Step 2
 - EGS creates input Report (Freeform Text: Customer name as it appears on bill, additional name on bill, service address line 1, ZIP Code).

Customer	Account Number
Full Name~~~Additional Name on Bill~~~Address Line 1~~~ZIP	
john smith~~~joan smith~~~123 main st~~~11111	
robert jones~~~debra jones~~~123 elm ave~~~11112	
katherine doe~~~123 south blvd~~~11113	

- The file must include a statement that the EGS certifies it has a valid LOA for each customer in the file.
- Step 3 – EGS submits batch file via Secure File Transfer Protocol (SFTP) server.

PECO in large part agrees with the file format proposed by Green Mountain Energy but proposes several changes to the overall process. PECO addresses the process change proposals first and believes both steps are technically feasible given the incorporation of the proposed changes.

Step 3 (SFTP) Comments

On the August 2012 call, Green Mountain Energy emphasized that its proposal is flexible and that the technology could change dependent upon ease of implementation and leveraging of existing systems and technology. As such, regarding Step 3 (request delivery via SFTP), PECO proposes to instead leverage an existing technology used to communicate with EGSs today, specifically its SUCCESS website, as opposed to implementing a new SFTP process for use strictly by this process.

The SUCCESS website (<https://success.peco.com>) is a secure location created by PECO to coordinate the delivery of competitive energy supply with EGSs. PECO uses SUCCESS to share both general and EGS-specific information with EGSs. EGSs also have the ability to upload and download specific wholesale energy settlement information using SUCCESS.

PECO believes that it can leverage existing manual upload functionality within the SUCCESS platform – with limited enhancements – to more efficiently and cost-effectively provide this account number retrieval service to EGSs than what could be done via an SFTP service. SUCCESS users with EGS-specific credentials would be able to log in and use the service by manually uploading a request file. (NOTE: PECO limits distribution of credentials to a specific number of individuals within the EGS or broker/marketer's organization for security purposes and as such would not award these credentials to more individuals solely for the use of this service. Users would need to solicit the appropriate contacts in their organization for these credentials, as they do today.)

The above suggestion modifies Green Mountain Energy's proposal from a batch process to a process that would offer responses to requests in near-real-time, assuming that the number of requests in the file is limited to 500 as suggested by Green Mountain Energy. More information on responses is offered in PECO's comments on Step 5 below. As such, PECO would not set a maximum on the number of request files that an EGS could manually upload within a given time frame, though PECO would reserve the right to take any actions reasonably believed to be necessary to detect, prevent, or otherwise address security or technical issues related to the process as mentioned previously.

Step 2 (File Format) Comments

Assuming acceptance of the above proposal, PECO agrees in large part with the proposed file format in Step 2 but recommends several changes.

First, PECO believes it likely that the customer name(s) included in the request file will not match the customer name(s) on the bill. PECO expects that the names provided in the request could differ significantly if the customer does not have his or her bill readily available.

Second, service addresses available in PECO systems may not include apartment numbers, suite numbers, floor numbers, or other secondary address characteristics within Address Line 1. Some addresses include this information as an addendum to Address Line 1, while others include it in Address Line 2. Therefore, the file format should also include

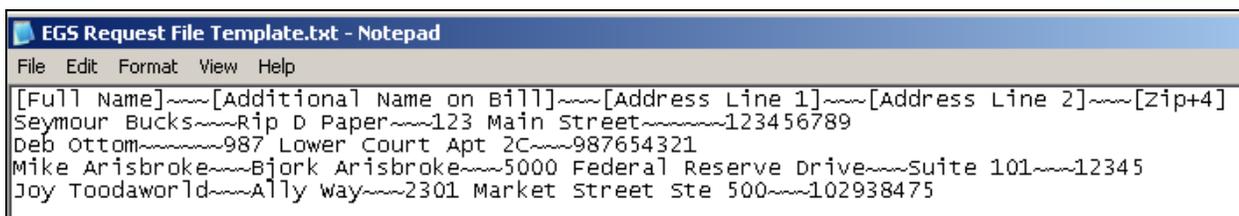
an Address Line 2 field, even though occasionally associated information may be part of Address Line 1 within PECO systems as opposed to Address Line 2.

Additionally, PECO's Eligible Customer List specifies the zip code field as accommodating ZIP+4. However, service addresses in PECO systems do not consistently include the +4 component.

The file format should NOT include column headings. Later in this document, when the response to the EGS is discussed, PECO expresses a preference to simply append the delimiters and response to each record as an additional field – as opposed to separating it in a column-by-column format. Please see discussion of PECO comments on Step 5 for additional details.

Finally, although PECO considers EGS acknowledgement of possessing a valid signed LOA to be important, PECO proposes that the file format NOT include a statement acknowledging as such. Omitting this record simplifies PECO processing of the requests, as each record would have common data elements. Instead, given that EGS possession of a valid signed LOA is an expectation of both EDCs and the PUC, PECO proposes that the SUCCESS web page offering the ability to upload a request file should include a static statement on the associated web page indicating that EGS submission of a file is considered acknowledgement of possession of a valid LOA for each customer requested in the file. In addition, PECO proposes to add that this disclaimer specify the EGS as acknowledging that the request is being submitted by a live user (as opposed to an automated process submitting multiple requests, which could impact website performance).

PECO therefore proposes a revised request file layout as shown below. The EGS would manually upload a file in this format to PECO's SUCCESS website. Note that the fields within the file should be delimited by three tilde marks ("~~~"), as proposed by Green Mountain Energy. Note also that PECO agrees with Green Mountain Energy that allowing the submission of up to a maximum of 500 requests in a single request file is a technically feasible maximum.



```
EGS Request File Template.txt - Notepad
File Edit Format View Help
[Full Name]~~~[Additional Name on Bill]~~~[Address Line 1]~~~[Address Line 2]~~~[Zip+4]
Seymour Bucks~~~Rip D Paper~~~123 Main Street~~~123456789
Deb Ottom~~~987 Lower Court Apt 2C~~~987654321
Mike Arisbroke~~~Bjork Arisbroke~~~5000 Federal Reserve Drive~~~Suite 101~~~12345
Joy Toodaworld~~~Ailly way~~~2301 Market Street Ste 500~~~102938475
```

Step 4: EDC matches account number

Green Mountain Energy proposes that the EDC run a report against its customer account database to retrieve customer account numbers based on a match of the attributes provided in the request file.

Although PECO agrees with the principle of this step and believes that such matching is technical feasible, PECO will be required to implement extremely rigid matching rules to avoid inadvertently releasing erroneous account numbers, as discussed earlier in this report-out. More specifically, PECO will require a precise / exact match on Full Name, Address Line 1, Address Line 2, and Zip+4. All variances (with the exception of upper versus lower case) will result in a mismatch. If either no match or multiple matches are found, PECO will then repeat these searches using the Additional Name On Bill and a combination of both name fields.

PECO will not interpret any of the information beyond the text provided in the request file. For instance, PECO will not interpret “Bill” as “William”, “Jennifer” as “Jenny”, or vice versa in either case. Similarly, PECO will not interpret “St” as “Street”, “Ave” as “Avenue”, or vice versa.

Step 5: EDC publishes and delivers response to EGS

Green Mountain Energy proposes that the EDC return the submitted request file with a response for each request within that file. Responses could be either the one PECO account number retrieved (for a precise match), “NO HIT” if no match was found, or “MULTIPLE” if more than one precise match is found.

PECO agrees with this approach and considers it to be technically feasible within the framework of the modified process proposed above. Rather than submitting the response as a batch file and delivering it via SFTP, PECO would provide in near-real-time a copy of the request file with the appended information as text to the user of PECO’s SUCCESS website. The user would then have the option to open or save the complete set of information, including the responses, as text – just as SUCCESS website users are able to do today with wholesale settlement information.

PECO also proposes adding one additional response. As mentioned previously, the EGS is responsible to verify whether the customer’s account number is available on the Eligible Customer List before submitting the response. PECO would prefer to continue driving EGSs in that direction when possible and deter EGSs from submitting requests without having performed that check. Therefore, if PECO finds a precise match but also finds that the matched account number is also on the Eligible Customer List, then PECO proposes to append a response of “ON ECL” to the request, driving the EGSs to perform the necessary lookup. This will help to ensure that PECO receives only those requests that truly cannot be satisfied via Eligible Customer List lookup.

PECO therefore proposes a response as shown below. The SUCCESS user can view this as text within a web browser or save it as a text file.

```
EGS Output File Template.txt - Notepad
File Edit Format View Help
[Full Name]~~~[Additional Name on Bill]~~~[Address Line 1]~~~[Address Line 2]~~~[Zip+4]
Seymour Bucks~~~Rip D Paper~~~123 Main Street~~~123456789~~~999999999
Deb Ottom~~~987 Lower Court Apt 2C~~~987654321~~~ON ECL
Mike Arisbroke~~~Bjork Arisbroke~~~5000 Federal Reserve Drive~~~Suite 101~~~12345~~~NO HIT
Joy Toodaworld~~~Ally way~~~2301 Market Street ste 500~~~102938475~~~MULTIPLE
```

PECO agrees with Green Mountain Energy’s assertion that the EDC has no obligation to perform additional research on the customer. PECO has no intention of adding additional human resources to support this process, expecting it to be fully automated with no need to research follow-up inquiries sent to PECO Supplier Support resources.

Assuming implementation of the proposed modifications to the process above, PECO also agrees with Green Mountain Energy’s assertion that an EGS may re-submit a request for the same customer in a future request file with what they believe to be corrected information. PECO does not intend to limit the number of times that an EGS may re-submit a request.

Appendix A – Green Mountain Energy’s Detailed Proposal

Provided by John Holtz, Director of Market Development, Green Mountain Energy

Step 1: EGS obtains customer authorization on a “Letter of Authorization,” (LOA) in a format approved by the PUC. Sales that are eligible for the account number look-up process are limited to those sales involving customer interaction with an EGS agent or marketing representative at a location away from the customer’s residence. Door-to-door sales are excluded from the account number look-up process. The EGS is responsible for verifying the customer is not included on the Eligible Customer List before submitting a request to an EDC for account number look-up.

Step 2: EGS creates input Report (Freeform Text: Customer name as it appears on bill, additional name on bill, service address line 1, ZIP Code). The file must include a statement that the EGS certifies it has a valid LOA for each customer in the file.

Customer	Account Number
Full Name~~~Additional Name on Bill~~~Address Line 1~~~ZIP	
john smith~~~joan smith~~~123 main st~~~11111	
robert jones~~~debra jones~~~123 elm ave~~~11112	
katherine doe~~~123 south blvd~~~11113	

Step 3: EGS submits batch file via Secure File Transfer Protocol (SFTP) server.

Step 4: EDC receives file from EGS and runs a Report against its customer account database to retrieve customer account numbers based on a match of the attributes provided in EGS file.

Step 5: The returned file from the EDC would have the following format: “NO HIT” would indicate unable to find a match for the fields provided; “MULTIPLE” would indicate that multiple customer records match the set of criteria; an associated account number would be returned where only one match is found. In cases where the search results in “NO HIT” or “MULTIPLE” there is no obligation on the EDC to perform additional research on the customer. An EGS may re-submit a request for the same customer in a future Report with corrected information.

Customer	Account Number
Full Name~~~Additional Name on Bill~~~Address Line 1~~~ZIP	
john smith~~~joan smith~~~123 main st~~~11111	1234567890
robert jones~~~debra jones~~~123 elm ave~~~11112	MULTIPLE
katherine doe~~~123 south blvd~~~11113	NO HIT

Additional Requirements:

Frequency: One batch file per week per EGS may be submitted

File Size: Maximum 500 accounts per EGS file.

Appendix B – Green Mountain Energy’s Proposed Sample Letter of Authorization for Account Number Retrieval

	<h3>Residential Electricity Enrollment Form</h3> <p style="font-size: small;">Green Mountain Energy Company ("Green Mountain") P.O. Box 7476 Philadelphia, PA 19101 - Phone: 800-286-5856 Your Electricity Distribution Company ("EDC"), PECO, stays the same.</p>	PECO G		
<p>↑ _____ First Name (Primary Name on Account) Last Name MI</p> <p>_____ Last Name MI</p> <p>↑ _____ Service Address (not P.O. Box) Apartment #</p> <p>↑ _____ City State Zip Email Address</p> <p>↑ _____ Primary Phone Alternate Phone</p> <p>_____ Mailing Address (if different from above – this may be P.O. Box) City State Zip</p> <p>_____ PECO 10-digit Account Number - (if available) INITIALS</p> <p style="text-align: right; font-weight: bold; font-size: small;">I authorize Green Mountain Energy Company to contact PECO to obtain my account number for purposes of completing my enrollment for electric supply service with Green Mountain.</p>				
<p>↑ PRODUCT (please <u>initial</u> one to choose a product)</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <p>_____ Pollution Free Gold™ - Reliable Rate electricity (RR20PG11A001) 10.9¢ per kWh Fixed Rate Term: 12 Months/Cancellation fee: \$100</p> </td> <td style="width: 50%; border: none;"> <p>_____ Pollution Free Gold™ electricity (MM20PG11A001) 10.5¢ per kWh Variable Rate Term: Month-to-Month</p> </td> </tr> </table> <p>By signing below, you acknowledge and agree that:</p> <ul style="list-style-type: none"> • You consent to change to Green Mountain as your electric generation supplier (EGS). • You understand that your electricity generation services will be provided by Green Mountain, and that your electricity distribution, meter reading, and billing will continue to be provided by PECO. • You understand that the sales representative is representing Green Mountain Energy Company and is not from PECO. • If your 10-digit PECO account number was not provided, you authorize Green Mountain Energy Company to contact PECO to obtain your account number for purposes of enrollment with Green Mountain. • You acknowledge that Green Mountain has notified you that by signing up for competitive energy supply, you are consenting to the disclosure by PECO (your EDC) to Green Mountain and other potential EGS's of basic information, including your PECO account number, meter reading data, rate class, electric usage, address and phone, and whether you are on a budget billing plan. • Green Mountain is not responsible for any early cancellation fee charged by your electric generation supplier ("EGS"), if applicable. PECO (your EDC) does not assess cancellation fees. • You are at least 18 years old and the customer identified above or a person authorized to act on the customer's behalf with respect to the electricity service at the address above. You are voluntarily choosing to select or change the entity that supplies your electricity service to Green Mountain, and you are not filling out this form to receive additional information. • You have received and read/been given a reasonable opportunity to read this Residential Electricity Enrollment Form, including the Product terms. <p>↑ _____ Authorized Signature <small>(Signature is an agreement to initiate service and begin enrollment.)</small> _____ Date</p> <p style="text-align: center; font-weight: bold; font-size: x-small;">YOU, THE BUYER, MAY CANCEL THIS TRANSACTION AT ANY TIME PRIOR TO MIDNIGHT OF THE THIRD BUSINESS DAY AFTER THE DATE OF THIS TRANSACTION. SEE THE ATTACHED NOTICE OF CANCELLATION FORM FOR AN EXPLANATION OF THIS RIGHT.</p>			<p>_____ Pollution Free Gold™ - Reliable Rate electricity (RR20PG11A001) 10.9¢ per kWh Fixed Rate Term: 12 Months/Cancellation fee: \$100</p>	<p>_____ Pollution Free Gold™ electricity (MM20PG11A001) 10.5¢ per kWh Variable Rate Term: Month-to-Month</p>
<p>_____ Pollution Free Gold™ - Reliable Rate electricity (RR20PG11A001) 10.9¢ per kWh Fixed Rate Term: 12 Months/Cancellation fee: \$100</p>	<p>_____ Pollution Free Gold™ electricity (MM20PG11A001) 10.5¢ per kWh Variable Rate Term: Month-to-Month</p>			
<p>↑ Denotes Required Fields For Green Mountain Energy Company official use – Please do not write in this space.</p> <p>_____ Sales Code _____ Sales Agent Name _____ ID # _____ Fulfillment</p> <p style="font-size: x-small; text-align: center;">Please return to: Green Mountain Energy Company ("Green Mountain") P.O. Box 7476 Philadelphia, PA 19101 - Phone: 800-286-5856. Prices indicated above are only valid as of the date this form is presented by a Green Mountain sales representative. Subject to change thereafter.</p> <p style="font-size: x-small;">White Copy - Green Mountain Energy Company Yellow Copy - Customer PA_20_06012012</p>				

