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VIA FACSIMILE

April 20, 2009

Pennsylvania Public Utility Commission
Attn.: James P. McNulty, Secretary
P.O. Box 3265
Harrisburg, PA 17105

**RE: Smart Meter Procurement and Installation Plans
Docket No. M-2009-2092655**

Dear Secretary McNulty:

Pursuant to the March 30 and April 9, 2009 Secretarial Letters issued in this docket, Exelon Energy (Exelon Energy) hereby submits its comments. Thank you.

Very truly yours,


Jesse A. Rodriguez
Assistant General Counsel

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Smart Meter Procurement and : Docket No. M-2009-2092655
Installation Plans :

**COMMENTS OF PECO ENERGY COMPANY
ON STAFF'S DRAFT IMPLEMENTATION ORDER AND QUESTIONS
REGARDING SMART METER PROCUREMENT AND INSTALLATION PLANS**

Pursuant to the March 30 and April 9, 2009 Secretarial Letters issued in this docket, Exelon Energy (Exelon Energy) hereby submits its comments. Exelon Energy is a licensed electric generation supplier (EGS) in Pennsylvania engaged in the business of supplying electricity to commercial, industrial and governmental customers in the service territories throughout the Commonwealth.

Exelon Energy commends the work of the PUC to date on this issue and believes that developing thorough and consistent criteria for data gathering, validation and exchange is critically important to support a robust retail electric market that will provide customers with the knowledge needed to choose from a variety of product and service offerings that are tailored to the customer's specific electric consumption needs.

Generally, Exelon Energy avers that one of the most important goals of the PUC regarding implementation of smart meters should be achieving consistency of technological capabilities, protocols and processes between the electric distribution companies across the Commonwealth. Lack of standardization creates an impediment for entry into the market for EGS, conservation and curtailment service providers (CSP), and customers. Standardization, on the other hand, promotes efficiency and transparency that enhances an EGS' or CSP's ability to offer competitive services. Standard and interoperable meter protocols and information

management procedures reduce customization and system development costs for EGS and CSPs. These lowered costs and reduced barriers of market entry allow EGS and CSPs greater access to the competitive marketplace across the entire Commonwealth.

Additionally, appropriate transparency in processes, particularly in validation, error detection, and editing (VEE) protocol is necessary. The data generated by smart meter enhanced networks is most valuable when it is clearly defined. That is to say, the data becomes usable information only if its structure and composition are clear and understandable. The Meter Data Service Providers (MDSP) should be required to create clear, comprehensive, and detailed documentation that defines all data components and all data transformation or aggregation processes. The documentation should, at all times, allow EGS, CSPs, and customers to fully understand what the data includes, what it excludes, and how it is modified prior to publication.

Exelon Energy looks forward to working with Staff and the other stakeholders in this proceeding to develop the specific implementation protocols as this process continues.

Respectfully submitted,



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Dated: April 20, 2009

Counsel for Exelon Energy Company