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September 23, 2011

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
PO Box 3265
Harrisburg, PA 17105-3265

RE: Smart Meter Procurement and Installation (Docket M-2009-2092655)

Dear Secretary Chiavetta:

Enclosed are an original and three (3) copies of the Comments of the Demand Response and Smart Grid Coalition (DRSG) regarding the Pennsylvania Public Utilities Commission's Tentative Order entered on July 8, 2011, in Docket M-2009-2092655. DRSG requests that these comments be accepted as a late filing.

On August 22, 2011, DRSG attempted to file comments in response to the July 8, 2011, Tentative Order. It filed the comments via email to Kriss Brown, Assistant Counsel, Law Bureau (kribrown@state.pa.us), and to Annunciata E. Marino, Analyst, Bureau of Fixed Utility Services, (annmarino@state.pa.us). At the time, DRSG misunderstood the directions for filing comments and believed that comments could be filed solely by email. It now understands that this is not the case and would like leave for late and proper filing of these comments so that they can be added to the record of the proceeding.

Thank You,

A handwritten signature in black ink, appearing to read 'Paul Pietsch', is written over a large, stylized signature line.

Paul Pietsch
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Cc: Kriss Brown (Ckribrown@state.pa.us) and Annunciata E. Marino (annmarino@state.pa.us)

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**Comments of the
Demand Response and Smart Grid Coalition (DRSG)
To The
Pennsylvania Public Utilities Commission
On
Smart Meter Procurement and Installation
Doc. No. M-2009-2092655
Tentative Order**

Introduction

The Demand Response and Smart Grid Coalition is a trade association for companies that provide technologies, products and services in the area of DR and smart grid. Its members come from a wide variety of sectors, including manufacturing, energy efficiency, DR aggregation, smart metering, network communications, lighting, smart appliances, meter data management, storage, system integration, HAN and in-home devices and energy management. A full list of members, as well as more information about the organization, can be viewed at www.drsgcoalition.org.

DRSG is pleased to offer its thoughts and comments on the Commission's Tentative Order in this Proceeding. They are organized according to section and topic in the Tentative Order.

Data Exchange Standards for Current Business Processes

Real-Time and TOU Prices

DRSG is not recommending any changes to current business processes. However, to the extent new data exchange standards are developed and implemented for new business processes, DRSG suggests such standards be considered for future implementation for current business processes if the new standards are more cost-effective or otherwise beneficial. DRSG is

aware of standards under development for exchanging pricing and usage information by the North American Energy Standards Board, designated as the "Energy Service Provider Interface" (ESPI). In addition, the National Institute of Standards and Technology (NIST) has published in its Smart Grid Standards Catalog a data model for use with usage and pricing data, "PAP10." DRSG suggests the ESPI and PAP10 standards be among those considered for use in Pennsylvania.

Data Exchange Standards for New Business Processes

Role of EDEWG

DRSG notes its agreement with the following proposal of the Commission:

"Therefore, we propose that the identification and development of new standards and formats to support Act 129 smart meter statutory requirements, along with the ongoing maintenance of existing standards and processes for this purpose, be developed by EDEWG and presented to the Commission for review. We further propose that the development and ongoing maintenance of these standards and processes be done in a manner that includes all EDEWG participants, specifically, all EDCs, licensed EGSs, registered CSPs, and all other interested parties."

As noted above with respect to current business processes, DRSG suggests that the ESPI and PAP10 standards be among those considered relative to new business processes as well. Further, DRSG suggests that those considering the standards review the status of data exchange implementation in Texas and Ontario, where smart meter data is being exchanged among multiple entities today, and California, where the PUC has directed the utilities to implement approaches to exchange data with third parties authorized by consumers to receive their data. These jurisdictions and markets may offer useful examples or lessons learned.

Timeline for Development of Smart Meter Data Exchange Standards

Direct Access vs. Electronic Access

DRSG would like to clarify the meaning of "direct access" and "electronic access". DRSG understands "direct access" to mean access by a device in a home or business to information directly from the energy user's meter through a short-range wireless, power line carrier, or other local communications link.

DRSG understands "electronic access" to mean access to data that has been "backhauled" to the EDC data center, then exchanged via an Internet connection between the EDC and a third party. [para] Regarding providing automatic control, working group participants should consider that there are at least two primary communications options: one via the meter via the Home Area Network (HAN) – for businesses too – interface and one via the Internet. Both are in use in pilot and commercial implementations. Another option is private wireless or power line carrier networks.

Contact

Questions may be directed to the following:

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