

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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IRWINA. POPOWSKY  
Consumer Advocate

February 13, 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17101

RE: Standards for Electronic Data Transfer and  
Exchange Between Electric Distribution  
Companies and Electric Generation  
Suppliers  
Docket No. M-00960890F0015

Dear Secretary Chiavetta:

Enclosed for filing please find the Comments of the Office of Consumer Advocate in the above-referenced proceeding.

If you have any questions, please feel free to contact me at the number listed above.

Respectfully Submitted,

A handwritten signature in cursive script that reads "David T. Evrard".

David T. Evrard  
Assistant Consumer Advocate  
PA Attorney I.D. # 33870

Enclosure

cc: Office of Competitive Market Oversight  
Retail Markets Investigation (E-Mail only)  
Patricia Krise Burket, Law Bureau (E-Mail & Hand Delivery)  
Annunciata Marino, Bureau of Technical Services (E-Mail & Hand Delivery)

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BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Standards for Electronic Data Transfer and                   :  
Exchange Between Electric Distribution                    :  
Companies and Electric Generation Suppliers            :       Docket No. M-00960890F0015

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COMMENTS OF THE  
OFFICE OF CONSUMER ADVOCATE

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I. Introduction

The Office of Consumer Advocate (OCA) files these comments in response to the Public Utility Commission's (Commission) Tentative Order entered January 13, 2012 in the above-referenced docket. In that Order, the Commission tentatively approved two data control change requests from the Electronic Data Exchange Working Group (EDEWG) and set a 30-day comment period for interested parties to submit views on the data control change requests. Those requests involve: 1) the addition of information in the data exchange from Electric Distribution Companies (EDCs) to Electric Generation Suppliers (EGSs) to identify customers who have a net metering arrangement with their EDC; and 2) the addition of future values (and associated date ranges) for Peak Load Contribution (PLC) and Network Service Peak Load (NSPL) to the Historical Usage and Historical Interval Usage electronic data set. In granting tentative approval of the two data control change requests, the Commission directed EDCs to implement the changes within 12 months of the tentative order becoming final.<sup>1</sup>

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<sup>1</sup> The Commission would allow an exemption from the 12-month requirement if an EDC already has plans to make system-wide modifications that would incorporate the changes at a later time. Tentative Order at 6.

## II. OCA Comments

### A. The Proposed Data Control Change Requests

The requested data control changes involve the addition of specific information to the Electronic Data Interchange (EDI) 814 (Enrollment, Change, Reinstatement) and the EDI 867 (Historical Usage and Historical Interval Usage) transaction sets to indicate the existence of a net metering arrangement and the future values of the PLC or NSPL for a given customer. It is the OCA's understanding that the exchange of data through the identified EDI transactions occurs only if a customer has previously consented to the release of their customer information by either entering into an agreement to receive their electric supply from an EGS or by allowing their customer information to be included on the Eligible Customer List.<sup>2</sup> With that understanding, the OCA does not object to either of the data control changes proposed in the Tentative Order.

With respect to inclusion of a net metering indicator, the Tentative Order notes (p. 4):

...concerns have been raised by customers who have had net metering arrangements with EDCs and subsequently switch to EGSs without entering into net metering contracts with the EGSs. This causes customers to lose the benefit of the net metering arrangement.

Including a net metering indicator in the relevant EDI transaction sets will help ensure that the circumstance described by the Commission does not occur. As the Commission states (p. 4), it will "ensure that an EGS is aware that a customer is net metered prior to entering into a contract with that customer."

In the Tentative Order, the Commission also encouraged EDCs to educate customers at the time of signing a net metering agreement with the EDC of the consequences of switching to a

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<sup>2</sup> The OCA notes that the Commission's Order on Final Reconsideration in Docket No. M-2010-2183412, pertaining to the Eligible Customer List (ECL), authorized the inclusion as data elements on the ECL of a net metering indicator as well as a customer's current and future values for Capacity and Transmission Peak Load Contributions.

supplier that does not offer a net metering product. The OCA strongly supports such notification by the EDCs.

With respect to the addition of future PLC and NSPL values<sup>3</sup> (and their associated date ranges) to the EDI 867 transaction, the OCA agrees that, with consent to the release of that information having been previously obtained from the customer, providing this information to EGSs should assist them in better tailoring the products they make available to customers.

B. Cost Recovery

In the Tentative Order in this proceeding, the Commission noted that one EDC opposed the data control change requests unless it received cost recovery. In response, the Commission proposed that EDC costs related to these changes be addressed in an EDC's next base rate case. The OCA agrees that this is the appropriate means of addressing the recovery of costs incurred by EDCs in executing these changes to the EDI transactions.

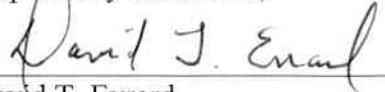
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<sup>3</sup> The Tentative Order notes that *current* PLC and NSPL values are already provided by way of the EDI 867 transaction.

### III. Conclusion

Based on its understanding that information can be exchanged through EDI transactions only if a customer has given consent to the release of the information either by entering into an agreement for supply from an EGS or by allowing that information to be included on the Eligible Customer List, the OCA supports the data control change requests addressed in the Tentative Order.

Respectfully Submitted,



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