

**Legal Department**

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February 13, 2012

**Via E-Filing**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Second Floor  
Harrisburg, PA 17120

**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 PECO Energy Company to the January 13, 2012 Tentative Order. Copies have been served as indicated on the attached Certificate of Service.

Very truly yours,



Jeanne J. Dworetzky  
Assistant General Counsel

JEG/adz  
Enc.

Cc: Parties on the Attached Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**STANDARDS FOR ELECTRONIC :  
DATA TRANSFER AND EXCHANGE : DOCKET NO. M-00960890F0015  
BETWEEN ELECTRIC :  
DISTRIBUTION COMPANIES AND :  
ELECTRIC GENERATION  
SUPPLIERS**

**COMMENTS OF PECO ENERGY COMPANY  
TO THE JANUARY 13, 2012 TENTATIVE ORDER**

PECO Energy Company (“PECO” or the “Company”) hereby submits these Comments in response to the Pennsylvania Public Utility Commission’s (“Commission”) January 13, 2012 Tentative Order on Standards for Electronic Data Transfer and Exchange Between Electric Distribution Companies and Electric Generation Suppliers (the “Tentative Order”). PECO appreciates the opportunity to provide comments on the Tentative Order.

In the Tentative Order, the Commission tentatively grants the request of the Electronic Data Exchange Working Group (“EDEWG”)<sup>1</sup> for two data control changes for statewide implementation. The first change, Change Control #085, would involve providing a marker identifying a customer as a net metering customer in the enrollment response and in historical usage transactions. This Change Control is intended to notify an EGS that a switching customer has a net metering arrangement before the EGS enters into a contract with that customer. The second, Change Control #087, would add future values, when available, for Peak Load Contribution (“PLC”) and Network Service Peak Load (“NSPL”) and an effective date range for both current and future values of PLC/NSPL to the EDI 867 Historical Usage and Historical

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<sup>1</sup> PECO has been an active participant in EDEWG since the late 1990s.

Interval Usage transaction sets. Presently, only current values are available. EGSs have requested this change to assist them in accurately determining prices.

PECO supports these proposed changes to EDEWG Change Controls #085 and #087 and seeks clarification on the Commission's statements about cost recovery in the Tentative Order. In response to concerns raised by PECO, the Commission notes that an EDC may address costs arising from changes such as the ones contemplated by the Tentative Order in a base rate case. While a base rate case is one mechanism for addressing the costs of such changes, it is not the only mechanism through which an EDC could appropriately seek to recover the costs of such changes. In particular, Change Controls #085 and #087 are related to the generation portion of a customer's bill. Accordingly, other mechanisms, including the incorporation of the costs into the discount to the Purchase of Receivables ("POR") or the incorporation of the costs into the Generation Supply Adjustment ("GSA"), may be appropriate for cost recovery in this context. PECO notes that a number of operational changes are being proposed by EDEWG and through the Commission's Retail Market Investigation and, on a cumulative basis, likely will present significant implementation costs. Accordingly, PECO asks that the Commission allow flexibility for the EDCs to seek cost recovery for this and other operational changes through the mechanism that best fits the circumstances.

In addition, PECO supports Change Control #85 requiring inclusion of the marker indicating net metering on a customer's account. PECO seeks clarification with respect to whether the marker proposed in the Tentative Order is intended only to identify whether the customer is a net metering customer or whether the marker also is intended to specify the particular fuel source (Special Meter Configuration) on the account. As currently configured, Change Control #085 includes fuel source specific codes. Because PECO customer accounts are

not currently marked with the specific fuel type, it would be burdensome and costly for PECO to identify the specific fuel source. Accordingly, PECO suggests revising Change Control #085 to enable a yes/no response indicating whether net metering is present on the account without specifying the particular fuel source. Notification of the specific fuel type is not necessary for EGSs to effectively address customers' concerns about net metering, so the use of codes enabling a yes/no response would provide a cost-efficient method of ensuring that EGSs receive timely notice that a customer has net metering.

PECO appreciates the opportunity to comment on the Tentative Order and asks that the Commission consider its comments.

Respectfully submitted,

  
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Date: February 13, 2012

*Counsel for PECO Energy Company*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

STANDARDS FOR ELECTRONIC DATA :  
TRANSFER AND EXCHANGE : DOCKET NO. M-00960890F0015  
BETWEEN ELECTRIC DISTRIBUTION :  
COMPANIES AND ELECTRIC  
GENERATION SUPPLIERS

CERTIFICATE OF SERVICE

I, Jeanne J. Dworetzky, hereby certify that I have this day served a true and correct

Copy of the Comments of PECO Energy Company to the January 13, 2012 Tentative

Order electronically upon the following:

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Dated: February 13, 2012

  
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