



13865 Sunrise Valley Dr., Suite 200
Herndon, VA 20171
703.793.7500
WGLEnergy.com

September 28, 2015

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta
Secretary
Pennsylvania Public Utility Commission
400 North Street
Keystone Building
2nd Floor, Room N201
Harrisburg, Pennsylvania 17120

Re: *Submission of the Electronic Data Exchange Working Group's Web Portal Working Group's Solution Framework for Historical Interval Usage and Billing Quality Interval Use*
Docket M-2009-2092655
Answer of WGL Energy Services, Inc. in Support of Petition of the NRG Retail Affiliates for Clarification and/or Reconsideration of the Commission's September 3, 2015 Final Order

Dear Secretary Chiavetta:

On behalf of WGL Energy Services, Inc., please accept this letter as its Answer in Support of the Petition of the NRG Retail Affiliates for Clarification and/or Reconsideration of the Commission's September 3, 2015 Final Order ("Petition") in the above-captioned matter. In its Petition, the NRG Retail Affiliates request that the Commission direct the electric distribution companies ("EDCs") to provide electric generation suppliers ("EGSs") access to near real-time (48 hour or less) billing quality interval usage ("BQIU") data. This data should be supplied through the "Active EGS" Rolling 10-Day process as set forth on pages 24-26 of the February 17, 2015 Electronic Data Exchange Working Group ("EDEWG") Pennsylvania Web Portal Working Group Solution Framework ("EDEWG Report").

Access to BQIU data is necessary to enable competitive suppliers to develop and offer innovative retail products to end users that leverage real time usage information. WGL Energy Services is already providing enhanced information services to customers served by the PHI Utilities where we have access to timely interval data. Our Energy Management Platform provides these customers with usage comparisons to prior periods as well as analytical tools to help them target specific energy efficiency activities that can reduce their consumption and energy costs. We look forward to providing similar services to the Pennsylvania customers as soon as possible.

It is disappointing that the EDCs with the most AMI meters are already providing hourly usage

data to their own outside reporting platforms and EGSs will have to wait over a year before the same data will be available for their use. EGSs could develop processes to use this same data if it were made available. It should not take 14 months to make this same data available for EGSs. Using the "Active EGS" Rolling 10-Day approach that the Web Portal Working Group recommended as Proposal 1 in their report will allow EGSs to use this existing data to support enhanced information products for their customers.

As smart meter deployment continues across Pennsylvania, it is important for suppliers to have timely and efficient access to this data. This will allow consumers to take advantage of the technology and information available to reduce consumption and improve their energy efficiency.

WGL Energy Services appreciates the Commission's consideration of NRG's Petition and this Answer. If there are any questions, you may contact me at 703-793-7562 or Phil Woodyard, Vice President, Operations, at 703-793-7560.

Sincerely,

A handwritten signature in black ink, appearing to read "Bernice K. McIntyre / CLM". The signature is fluid and cursive, with a large initial "B" and "M".

Bernice K. McIntyre
Program Director, Regulatory Strategy,
WGL Business Development and Non-utility Operations
WGL Energy Services, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Submission of the Electronic Data Exchange
Working Group's Web Portal Working Group's
Solution Framework for Historical Interval Usage
and Billing Quality Interval Use

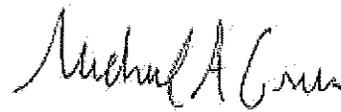
M-2009-2092655

CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of September, 2015 copies of the foregoing Answer in Support of Petition were served upon the persons listed below via First Class U.S. Mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

Tanya McCloskey, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1921	John Evans Office of Small Business Advocate Commerce Building, Suite 1102 300 North Second Street Harrisburg, PA 17101
Johnnie E. Simms, Esq. Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission 400 North St., 2 nd Floor West Harrisburg, PA 17105	Paul Russell, Esq. PPL Services Corporation Two North Ninth Street Allentown, PA 18108-1179
Tishekia Williams, Esq. Senior Counsel, Regulatory Duquesne Light Company 411 Seventh Street, MD 16-4 Pittsburgh, PA 15219	Tori Giesler, Esq. Lauren Lepkoski, Esq. First Energy Services Corporation 2800 Pottsville Pike Reading PA, 19612
Terrance J. Fitzpatrick Donna J Clark Energy Association of Pennsylvania 800 N. 3 rd St., Suite 205 Harrisburg, PA 17102	Romulo L. Diaz, Jr. Esq. Jack R. Garfinkle, Esq. W. Craig Williams, Esq. PECO Energy Company 2301 Market Street Philadelphia, PA 19103
Jim Hawley Michael Murray The Mission:data Coalition 1020 16 th St., suite 20 Sacramento, CA 95814	Dick Munson Environmental Defense Fund 18 S. Michigan Ave., 12 th Fl. Chicago, IL 60603

<p>Pamela C. Polacek, Esq. Adeolu A. Bakare, Esq. Elizabeth P. Trinkle, Esq. McNees, Wallace & Nurick LLC 100 Pine Street PO Box 1166 Harrisburg, PA 17108</p>	<p>Deanne O'Dell, Esq. Eckert Seamans 213 Market Street 8th Floor Harrisburg, PA 17101</p>
--	---



DATE: September 28, 2015

Michael A. Gruin, Esq.