



Duquesne Light
Our Energy...Your Power

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Tishekia E. Williams
Senior Counsel

April 5, 2013

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

**RE: Duquesne Light Company Final Smart Meter Procurement and Installation Plan
Docket No. M-2009-2123948**

Dear Secretary Chiavetta:

On December 6, 2012, the Pennsylvania Public Utility Commission ("Commission") entered a Final Order ("Order") at docket number M-2009-2092655 which requires electric distribution companies to implement certain electronic data interchange and other standards in conjunction with their smart meter plans. Pursuant to this Order, Duquesne Light is required make a supplemental smart meter filing within 120 days explaining how it will comply with the electronic data exchange standards outlined in the Order. The attached filing is submitted in accordance with the Commission's Order.

Should you have any questions, please do not hesitate to contact me.

Respectfully,

Tishekia E. Williams
Senior Counsel, Regulatory

Enclosure

cc: Certificate of Service

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PA PUBLIC UTILITY COMMISSION
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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION PA PUBLIC UTILITY COMMISSION
 SECRETARY'S BUREAU

Petition of Duquesne Light Company :
 For Approval of Its Final Smart Meter : Docket No. M-2009-2123948
 Procurement And Installation Plan :

**DUQUESNE LIGHT COMPANY'S
 FINAL SMART METER PROCUREMENT AND INSTALLATION PLAN
 SUPPLEMENTAL FILING**

I. INTRODUCTION

On December 6, 2012 the Pennsylvania Public Utility Commission (“Commission”) entered a Final Order (“Order”) at Docket No. M-2009-2092655 that requires electric distribution companies (“EDCs”) to implement certain electronic data interchange (“EDI”) and other standards. The purpose of the Order is “to facilitate the establishment of a standard electronic format for providing customers and their designated third-party representatives with direct electronic access to the customer’s electric usage and price data, with the customer’s consent.” Therein the Commission directed all EDCs subject to Act 129 of 2008 (“Act 129”)¹ to file a smart meter plan supplement explaining how it will meet the requirements outlined in the Order.

The Order provides data exchange requirements for current and future business practices. Specifically, the Order requires Duquesne Light Company (“Duquesne Light” or “Company”) to 1) provide Bill-Ready and Dual-Billing functionality; 2) install the capability to share a minimum of 12 months of historical interval account level or meter level usage via EDI within 1 year; and 3) provide for meter level IU data post-smart meter implementation. Additionally, the

¹ Act 129 requires electric distribution companies (EDCs) with more than 100,000 customers file smart meter technology procurement and installation plans with the Commission for approval. 66 Pa. C.S. § 2807(f). Act 129 also requires EDCs to provide access to electronic meter data to customers and their designated third parties, and providers of conservation and load management services. 66 Pa. C.S. § 2807(f)(3).

Commission directed the Electric Data Exchange Working Group (“EDEWG”) to initiate a web portal working group of all EDCs and interested stakeholders to develop a standardized solution for acquisition of interval usage data via a secure web portal with incremental progress. Short term, the system should provide 12 months of HI data via a secure web platform. Long term, the system should provide bill quality interval data within 24-48 hours of daily meter reads. The group shall complete its development standards for HI by March 1, 2014, and the bill quality IU solution by March 1, 2015. EDC participation is required in the working group.

Herein, the Company details its plan to comply with the Commission Order within the required timeframe where applicable.

II. BACKGROUND

On August 14, 2009, Duquesne Light filed its Initial Smart Meter Procurement and Installation Plan (“Initial Smart Meter Plan”) for Commission approval. The Initial Smart Meter Plan was approved with certain modifications by Order dated May 11, 2010. Pursuant to the May 11, 2010 Order, the Company was required to file periodic updates with the Commission detailing its smart meter implementation status.

On June 30, 2011, the Company made a milestone filing related to design, testing and certification of EDI transactions.² In that filing, Duquesne Light explained that validated hourly interval data would be provided through a secure web portal within 24 hours from the completion of the data upload for the entire population of Duquesne smart meters to the meter data management (“MDM”) systems. Additionally, non-validated, real time data would be provided to third parties through a secure, authenticated connection at the expense of the third party. Validated hourly interval data would be provided to third parties through a standard

² The Company made several milestone filings. However, the June 20, 2011 filing provided information relevant to the data exchange standards.

interface consistent with the North American Energy Standards Board (“NAESB”) within 24 hours of the completion of the data upload for the entire population of Duquesne smart meters to the MDM systems. For example, the Company noted that it would track the development of Model Business Practices REQ. 21.3.1³ General Practices for Energy Services Provider Interface (ESPI) which was being developed by NAESB. Finally, the Company indicated that it would provide EDI access to smart meter data to authorized commercial operators, such as conservation service providers and electric generation suppliers (“EGS”) using the 867 historical interval usage transaction.

On June 29, 2012, the Company filed a Petition for Approval of Duquesne Light Company’s Final Smart Meter Procurement and Installation Plan (“Final Smart Meter Plan”). Included with the petition was a copy of the Final Smart Meter Plan and direct testimony of David Wolfe, Peter Honebein and William Pfrommer. In the petition, the Company indicated that “Duquesne Light’s AMI will support TOU and RT programs offered by EGSs.... In addition, the Company is in the process of implementing “bill-ready” functionality which will allow EGSs to calculate a TOU customer’s or RTP rate customer’s bill, and provide the total for the Company to bill to customers. The bill-ready functionality will facilitate the support of EGS TOU and RT programs.” The Company also explained that its existing AMR system only supports TOU or hourly rates for customers with three-phase meters.⁴ The Company further indicated that this functionality would be provided in 2015.⁵

On December 7, 2012, Duquesne Light and the Office of Consumer Advocate filed an uncontested Joint Petition for Full Settlement of the Final Smart Meter Plan. The Joint Petition

³ This Energy Services Provider Interface will provide a consistent method for Retail Customers to authorize a Third Party to gain access to energy usage data.

⁴ See page 27, *Duquesne Light Company Final Smart Meter Procurement and Installation Plan*. June 29, 2012, Docket No. M-2009-2123948.

⁵ *Id* at Page 35.

resolved all issues related to the Company's smart meter implementation, including the issues raised in the various petitions and applications filed prior to the Final Smart Meter Plan. On January 24, 2013, Administrative Law Judge Katrina Dunderdale issued a Recommended Decision approving the Joint Petition without modification. The Company's Final Smart Meter Plan has not been approved by the Commission.⁶

III. Data exchange standards for current business processes

a. Bill-Ready and Dual-Billing functionality

Duquesne Light continues to support approval of bill-ready and dual Billing processes. However, the Company's current billing systems cannot support bill-ready functionality. The Company's current business processes provide rate-ready and dual-billing functionality.⁷ Duquesne Light systems will have the ability to support bill-ready functionality effective December 2013 when it completes its billing system conversion. Bill-ready functionality will be fully implemented in coordination with its smart meter deployment in 2015.

The Company is currently installing a new Customer Information System ("CIS") known as "FOCUS" (For Our Customers). The system conversion is currently scheduled for completion in December 2013. Upon completion of the CIS conversion, Duquesne Light will have the ability to implement bill-ready functionality. Minimally, full implementation of bill-ready functionality as stated above would require the Company to enhance the base functionality

⁶ On April 4, 2013, the Company's Final Smart Meter Plan was considered at the Commission's Public Meeting. Commissioners Garner and Crawley issued a Motion ordering Duquesne Light "to make a compliance filing within 90 days specifying its proposed changes to settlement and profile processes and providing data supporting whether or not inclusion of the voltage monitoring and communications of outages and restorations capabilities are cost effective." No final order has been issued at the time of this filing.

⁷ As defined by the Commission Rate-Ready functionality is the capability of the billing party to calculate non-billing parties charges based on rate information provided by the non-billing party. Dual-Billing functionality refers to the EDC and EGS' ability to render separate customer bills for the products and services provided by each entity. Finally, Bill-Ready functionality is the capability of the billing party to receive calculated charge amount(s) directly from the non-billing party in lieu of the billing party calculating it directly from the rate.

of the new FOCUS system to process bill calculation EDI-810 transactions from bill-ready suppliers, as well as programming modifications to enrollment, drop, and switching transactions, modify the Gentran translation software used to process supplier transactions to include the additional mapping, modify DLC's bill print programs to include the billing details received from suppliers, and significant supplier testing.

The Company intends to have bill-ready functionality fully implemented by 2015 to support TOU and RTP programs. The Company is evaluating its initial plan and will provide further information in connection with its smart meter compliance filing.

b. *Historical Interval Usage ("HI")*

Presently Duquesne Light is not capable of providing customers or authorized third parties with 12 months of HI account level or meter level data via EDI. All historical interval usage requests are handled through a manual process via email. Duquesne Light is, however, capable of providing both account and meter level data through the manual process. The Company currently plans to implement the EDI 867HI transaction by January 2014. Duquesne Light will provide interval usage using EDI 867HI at meter level only.

c. *EDEWG Web Portal Working Group*

Duquesne Light also supports the Commission's efforts to develop a standardized, secure web-based portal for exchanging 12 month historical interval usage data post-smart meter deployment. As previously indicated, the Order requires EDEWG to establish a web portal working group. Short term, the system should provide 12 months of HI data via secure web platform. Long term, the system should provide bill quality interval data within 24-48 hours of daily meter reads. Pursuant to the Order, the group shall complete its development standards for

HI by March 1, 2014, and the bill quality IU solution by March 1, 2015. EDC participation is required in the working group.

Duquesne Light is actively engaged and closely monitoring the development of the EDEWG working group. The Company will continue to participate in the web portal working group process to develop standardized solutions for acquisition of interval usage data via a secure web portal with incremental progress.

As outlined in the Company's Final Smart Meter Plan, the Company is developing a web portal to provide customers access to smart meter usage data. Validated hourly interval data would be provided through a secure web portal within 24 hours from the completion of the data upload for the entire population of Duquesne smart meters to the MDM systems. Additionally, non-validated, real time data would be provided to third parties through a secure, authenticated connection at the expense of the third party. Validated hourly interval data would be provided to third parties through a standard interface consistent with the NAESB within 24 hours of the completion of the data upload for the entire population of Duquesne smart meters to the MDM systems. Consistent with the Commission's Order, Duquesne Light will continue to develop its web portal to allow customer's access to HI.

d. *Bill Quality Interval Usage*

Duquesne Light currently provides bill quality monthly *account* level IU data via the EDI 867IU transaction. Duquesne Light will have the capability to provide bill quality monthly *meter* level IU data via this same EDI 867IU transaction by December 2013 upon completion of the billing system conversion. Duquesne Light notes that the EDI 867IU will not prevent the Company from providing meter level IU data more frequently than a monthly basis. Duquesne Light anticipates that the data will be available on the portal within 48 hours of the daily reads.

IV. DATA EXCHANGE STANDARDS FOR NEW BUSINESS PROCESSES

Duquesne Light supports the Commission's efforts to identify and adopt appropriate national standards such as those developed by NAESB and the National Institute of Standards and Technology ("NIST"). In the Order, the Commission requires EDCS to propose appropriate NAESB and NIST standards in coordination with their smart meter plans. Duquesne Light's current AMI standards are included in Appendix A of its Final Smart Meter Plan. For example, the standards listed included NEMA SG-AMI-2009 related to AMI meter upgradability, which is included in the *NIST Framework and Roadmap for Smart Grid Interoperability Standards*, Release 2.0. In its Final Smart Meter Plan, the Company provided information related to the national standards utilized in its smart meter plan.

By way of background, Duquesne Light notes that the Energy Independence and Security Act ("EISA") of 2007 directed the NIST to coordinate the development of interoperability of smart grid devices and systems, including protocols and model standards.⁸ EISA acknowledges the importance of flexibility in design, and requires interoperability standards to account for regional and organizational differences, as well as technology advances.⁹ Additionally, EISA directs the Federal Energy Regulatory Commission ("FERC"), once it has determined that NIST's work has led to "sufficient consensus" on smart grid interoperability standards, to institute a rulemaking proceeding to adopt such standards and protocols.¹⁰ On July 19, 2011, FERC issued an order regarding Smart Grid Interoperability Standards ("Order").¹¹ The Order addressed standards NIST identified as ready for consideration by FERC. FERC found there

⁸ 42 U.S.C. 17385(a).

⁹ 42 U.C.S. §17385 (b).

¹⁰ 42 U.S.C. 17385(d).

¹¹ Docket RM11-2-000.

was insufficient consensus for the five families of standards under consideration and declined to institute a rulemaking proceeding.

The Order relied on information gathered at two technical conferences and comments filed by the industry. Of great significance, the Order noted that NIST in its comments stated that it would be impractical and unnecessary for FERC to adopt individual interoperability standards. Given the importance of NIST's role in developing the standards, Duquesne has reviewed NIST's comments and finds the following relevant to this proceeding:

NIST believes that the intent of EISA can be best served by FERC issuing a policy statement endorsing the NIST Framework as guidance to achieve interoperability of the Smart Grid, rather than adoption of individual standards.¹²

The vendors involved in building Duquesne's AMI System have designed the products selected by Duquesne Light to national standards. Duquesne Light supports the Commission's policy of encouraging EDC use of national standards in coordination with smart meter plans but notes that adoption of individual standards may not be practical at this time.

V. CONCLUSION

Duquesne Light looks forward to participating in the EDEWG web portal working group as well as national standards boards such as NIST and NAESB. Additionally, the Company supports customers and authorized third-party representatives having electronic access to the customer's electric usage and price data with the customer's consent.

¹² NIST Comments (April 7, 2011), Docket RM11-2-000, page 2.

The Company requests that the Commission approve the Company's plan to provide access to data by customers and authorized third parties.

Respectfully Submitted,



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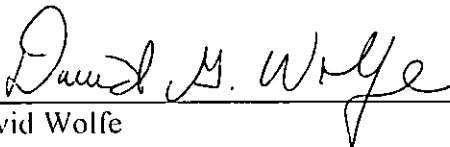
BEFORE THE
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Procurement And Installation Plan :

VERIFICATION

I, David Wolfe, being an agent of Duquesne Light Company, state that I am authorized to make this Verification on behalf of Duquesne Light Company that the facts and information set forth in the foregoing supplement are true and correct to the best of my knowledge, information and belief, and I expect to be able to prove the same at any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.

Date: April 5, 2013



David Wolfe
Director of Technology

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of Duquesne Light Company's Final Smart Meter Procurement And Installation Plan Supplemental Filing has been served upon the following persons, in the manner indicated, in accordance with the requirements of § 1.54 (relating to service by a participant):

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Dated April 5, 2013



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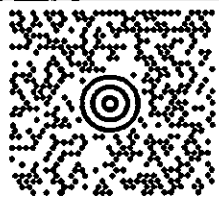
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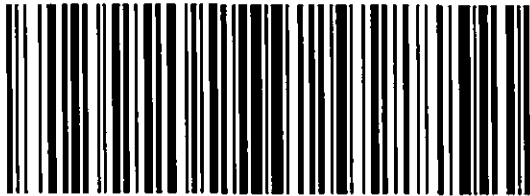
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