Aug 5, 2011

Jonathan Booe

NAESB Deputy Director

 Re: DTE Comments on NAESB REQ 21 Draft Dated Jul 6, 2011

Dear Mr. Booe,

DTE Energy appreciates the opportunity to submit comments on the proposed NAESB REQ.21, “Energy Services Provider Interface” (ESPI) standard. Our comments are made on the draft dated July 6, 2011.

**REQ.21.3.1.27**

REQ.21.3.1.27 references NAESB REQ.22, “Third Party Access to Smart-Meter-based Information.” Our concern is that there are significant gaps and inconsistencies between REQ.21 and REQ.22.

**REQ.21.2**

The two documents differ greatly as far as what terms they define and, in the single instance in which they both define the same term, their definitions for that term are different. Please refer to the following table to note the differences at a glance:

|  |  |
| --- | --- |
| **Terms Defined in REQ.21.2** | **Terms Defined in REQ.22.2** |
| Authorizing Entity | Applicable Regulatory Authority |
| Third Party | Distribution Company |
| Authorized Third Party | Entity |
| Energy Services Provider Interface | Governing Documents |
| Personally Identifiable Information | Retail Customer |
| Data Custodian | Authorization |
| Energy Usage Information | Privacy Use Case |
|  | Smart Meter-Based Information |
|  | Third Party |

As can be seen, the only term defined in both documents is “Third Party.” Unfortunately, the two standards define “Third Party” differently.

We are concerned that businesses that are trying to enact business practices based on these two standards would be presented with difficulties arising from the need to reconcile the differing terminological concepts.

We believe that the terms and definitions between REQ.21 and REQ.22 should be harmonized to facilitate usage of both standards together.

**REQ.21.3**

In general, a specific effort should be undertaken to review and ascertain the state of harmony between REQ.21.3 and REQ.22.3 and to assure consistency between them.

For example, REQ.21.3.1.23 appears to be inconsistent with REQ.22.3.3.1.6 regarding notifications in the event of changed relationships. REQ.21 says all parties should be notified in the event of changed relationships while REQ.22 specifically says notification is not required where Third Party ownership changes.

**REQ.21.3.1.1**

This paragraph reads, “To the extent required by the Applicable Regulatory Authority, or as otherwise agreed by Data Custodian consistent with Applicable Regulatory Authority, Authorized Third Parties and Data Custodians should exchange Retail Customer’s EUI at the Retail Customer’s request pursuant to the requirements as set forth in NAESB REQ.21, subject to the Governing Documents.”

Our concern is that this document blurs the line between business policy and the technical aspects of the energy services provider interface. It can be construed that to be “ESPI-compliant” a provider would have to provide all of the energy usage data this standard identifies.

We believe that a clarifying statement should be made that ESPI compliance will entail utilization of the models, formats, etc. contained in this standard for whatever agreed upon data is to be shared as opposed to compliance meaning that all the described data points are to be included in the data sharing.

As an example, the “ElectricPowerQualitySummary” on page 17 includes data points related to voltage flicker, harmonics, frequency and others that are not technically feasible for measuring at this time. The AMI meters that are currently being built are not capable of making these measurements nor are there any other technologies currently available for measuring these quantities on mass scale at customer premises. Furthermore, there may be business reasons for not providing some of the data points described in the summaries.

**REQ.21.6.5**

In the XML Schema section, we would like to make note of one technical point. On page 45, there is a line that reads, “<xs:element name="start" type="TimeType" minOccurs="1" maxOccurs="1">”. This line appears to be utilizing a separate, unique time structure rather than a standards XML time structure. This technical point should be reviewed.

**Appendix D**

In the table in Appendix D, Model Conformance Information, the CIM note for the “DataTimeInterval.duration” element states, “Uses ‘end’ instead of duration.” We question the technical voracity of this deviation from typical CIM usage practice.

DTE Energy wishes to thank NAESB for its work on this standard and its consideration of these comments.

Ronald W Vader /s/

Senior Engineer,

Distribution Operations SmartCurrents Standards

DTE Energy