

To: Public Utilities Commission of Ohio  
From: GridWise® Architecture Council  
Subject: PUCO Case No. 12-150-EL-COI  
Date: April 11, 2012

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Members of the GridWise Architecture Council (GWAC) have reviewed the Public Utilities Commission of Ohio (PUCO) Case No. 12-150-EL-COI regarding Time-Differentiated and Dynamic Pricing Options for Retail Electric Services and is pleased to offer comments.

The GWAC has been concerned with interoperability for smart grid technology and implementation for nearly a decade. Interoperability can take the shape of open architectures which can lead to innovative solutions to problems, or simply applying a standard to the communication between two systems. Within the context of the PUCO case the council wishes to point out that attention to interoperability is a key to answering the questions put forth in the case. Information interchange is at the heart of the questions posed by the PUCO. Information about time-differentiated and dynamic pricing options and perhaps more importantly information for consumers to make informed decisions about how such options will or will not be beneficial to them.

Interoperability is a key to enabling the utilities and third-parties to provide value added services to consumers. These services can include basic information about energy consumption as well as analyses or other actions producing information on which consumers can base their energy consumption decisions. The commission should promote, but not mandate through regulatory action, the definition of common data formats to support the free flow of data between consumers, utilities and third-party service providers. Existing data formats and technologies should be used wherever possible. For example, extensive use of the results of the Green Button initiative should be considered. These third-party service providers are not unique to Ohio, and the use of existing data formats and technologies will foster similar applications in other jurisdictions.

Interoperability is also a key element of effective consideration of privacy and cyber security requirements to safe guard information while allowing for the free flow of information according to consumer choices. Interoperability in this context is multifaceted including the consideration of common regulatory approaches to privacy rules as well as the application of best practices technology from the electric power industry and industries with similar requirements such as financial services.

The reference to “common regulatory approaches” recognizes that privacy problems are not unique to Ohio or the electric power industry. Other jurisdictions are also considering privacy questions and organizations such as NAESB have efforts underway to develop common approaches to privacy problems. The widespread adoption of common regulatory and policy language for privacy are an example of a complex dimension of interoperability described in the GWAC “Interoperability Context Setting Framework” and illustrated in the so-called “GWAC Stack.” The PUCO may find additional information on this concept in the Interoperability Context Setting Framework and the “Interoperability

Decision Maker's Checklist." Both are posted in the publications section of the Council's website at [www.gridwiseac.org](http://www.gridwiseac.org).

The docket also appears to be looking at the concept of prices to devices. In this arena, GWAC wishes to stress the need for the use of appropriate standards, and recommends that the PUCO references (where appropriate) but does not define data formats through regulatory action. However, it is just as important to provide the correct price as it is to provide the correct common data format and in choosing which pricing to expose to the consumer the price must be relevant to the customer's retail rate.