



August 16, 2010

NAESB
801 Travis Street
Suite 1675
Houston, TX 77002
Attn: Jonathan Booe

Dear Jonathan,

Please find the following comments relating to the NAESB PAP10 Energy Usage Information document from the EIS Alliance:

The PAP10 standard should include a simplified, normative core data model for usage and load that can be extensible to function with additional data elements as needed.

- The model should be used to mask the complexity of the utility metering system from others needing access to usage information.
 - (for example: reference line 505-516 of the Recommendation to the NAESB Committee Req. 18 V04)
- The model will need to interact and exchange data with existing commercial and industrial systems.
 - (for example: line 668-688 of NAESB Committee Req. 18 V04)
- The model should be able to be aggregated.
 - (for example: one should be able to sum, divide, and project usage information)

The PAP 10 standard does not appear to consider certain elements of the EIS Data Model including, but not necessarily limited to:

- Distributed Energy Resources (DER)
- Energy Usage Forecasting from the Premises
- Weather Data
- Energy Emissions Data

A simplified core model should be defined in the standard. A description of a “Core Model for Energy Usage Information” was posted to the NAESB website by Bill Cox. That document should be strongly considered in the development of the PAP 10 standard.

- It is compliant with the work of other PAPs, including 03 and 04, and would be easily adaptable for use in 09.
- Its simplicity requires less knowledge to use and conformance is easily testable.
- It is suitable for use in projections, demand response, and market operations as well as for historical reporting



The existing "Straw Model" is valuable for the SEP residential environment and can be demonstrated to be in compliance. We recommend it be included as an example of how to show compliance with a domain-specific model and the Core Model.

A handwritten signature in black ink that reads "David L. Bunzel". The signature is written in a cursive style with a large initial "D" and a long, sweeping underline.

David L. Bunzel
Executive Director
EIS Alliance