**Comments of Baltimore Gas and Electric on**

**OpenFMB Recommendation**

**2015 Retail Annual Plan Item 9.a/R14008**

Baltimore Gas and Electric thanks the OpenFMB Task Force for all of the hard work that went into the Recommendation. It is an excellent document that will assist any party looking to create an OpenFMB Implementation.

To be consistent with other RMQ Books, there are some additions which should be made to the Executive Summary and Introduction sections. These are shown as Redlines below.

**EXECUTIVE SUMMARY**

If appropriate, please add the following two paragraphs to the end of the Executive Summary:

In a business environment where best practices are voluntary, Model Business Practices should be followed, taking into account any applicable contractual agreements, tariffs, or rate schedules and subject to the Governing Documents and Applicable Regulatory Authority requirements. Therefore, any obligation to use these voluntary Model Business Practices, including any modified form thereof, would be established by Governing Documents and Applicable Regulatory Authority rules and regulations.

These Model Business Practices are intended to serve as flexible guidelines, rather than “one-size-fits-all” requirements. In this capacity, they can provide information and guidance that will help voluntary adopters, whether Distribution Companies, other Market Participants, or Applicable Regulatory Authorities to make informed decisions that appropriately balance beneficial uses of these Model Business Practices.

**INTRODUCTION**

The North American Energy Standards Board (NAESB) is a voluntary non-profit organization comprised of members from all aspects of the natural gas and electric industries. Within NAESB, the Retail Electric Quadrant (REQ) and the Retail Gas Quadrant (RGQ) focus on issues impacting the sale of energy or other specific energy-related products and services to Retail Customers. Retail Markets Quadrant (RMQ) Model Business Practices are intended to provide guidance to Distribution Companies, Suppliers, and other Market Participants involved in providing energy service to Retail Customers. The focus of these voluntary Model Business Practices is the Open Field Message Bus.

The Open Field Message Bus (OpenFMB) is a framework for Utility Service Providers to securely access Grid Edge field data and share it between all devices and systems. OpenFMB leverages proven internet technology for improved situational awareness and better scalability of the grid infrastructure at Utility Service Providers. The OpenFMB Framework is comprised of a reference architecture, framework approach, and implementation best practices.

These Model Business Practices are voluntary and do not address policy issues that are the subject of state legislation or regulatory decisions. These voluntary Model Business Practices have been adopted by NAESB with the realization that, as the industry evolves, additional and amended Model Business Practices may be necessary. Any industry participant seeking additional or amended voluntary Model Business Practices (including principles, definitions, data elements, process descriptions, and technical implementation instructions) should submit a request to the NAESB office, detailing the change, so that the appropriate process may take place to amend the voluntary Model Business Practice.

In addition, I reviewed the Definition section which contains a number of Technical Definitions. I also reviewed the Technical Definitions in Book 15 – Specifications for Common Electricity Product and Pricing Definition to see if the definitions were consistent. There are no over-lapping terms. However, care should be taken in the future if changes are made to either Book to insure the definitions remain consistent.

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