

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Comments on Electronic Tariff Filings )**

**Docket No. RM01-5-000**

**COMMENTS OF THE NATIONAL ENERGY MARKETERS ASSOCIATION ON  
ELECTRONIC TARIFF FILINGS**

The National Energy Marketers Association (NEM) hereby submits Comments on Electronic Tariff Filings pursuant to the March 20, 2001, Federal Register Notice.

**I.**

NEM is a national, non-profit trade association representing both wholesale and retail marketers of energy and energy-related products, services, information and technologies throughout the United States. NEM's membership includes: small regional marketers, large traditional international wholesale and retail energy suppliers (as well as wind and solar power), billing and metering firms, Internet energy providers, energy-related software developers, risk managers, energy brokerage firms, information technology providers, manufacturers and suppliers of advanced distributed generation as well as clean coal technologies. Our membership has both affiliated and unaffiliated companies.

NEM is committed to working with representatives of state and federal governments, large and small consumer groups and utilities to devise fair and effective ways to implement the competitive restructuring of natural gas and electricity markets.

**II.**

**Executive Summary**

As a general matter, NEM commends the Commission for instituting this proceeding on electronic tariff filings to consider the standardization of tariff formats themselves as well as the use of an XML format for tariff filings to facilitate database management. NEM recommends the immediate implementation of Uniform Business Practices and Standardized Information Protocols for use on the Internet, using XML, to lower energy

costs and permit regional and national economies of scale to be achieved as discussed in NEM's National Policy Guidelines entitled, "National Energy Technology Policy."<sup>1</sup>

### **III. Comments**

The Commission has raised three issues for consideration regarding electronic tariff filing: 1) whether the existing tariff sheet model for gas and electric tariffs is conducive to electronic filing; 2) whether there should be further standardization of tariff formats across companies and industries; and 3) what electronic format should be used in making the filings, with the Commission's goal being the adoption of a stable, generic, nonproprietary filing format, such as XML.

Meaningful price competition cannot occur until competitive suppliers can aggregate energy demand across utility service territories. In that regard, NEM has long advocated the adoption and implementation of uniform business practices and procedures as well as standardized data transfer protocols. There are a significant number of rules, procedures, processes and business practices, which, if established fairly, efficiently, and uniformly across the country could bring significant cost savings in a very short period of time. If market participants are forced to divert scarce resources to customize billing, back-office, and customer care facilities, and to develop and maintain non-standardized information protocols or develop specialized knowledge of different business rules in each jurisdiction, it drives energy prices higher nationwide.

The challenge to maximizing the public benefit of implementing Uniform Business Practices is the fact that there are currently different information protocols and processes being used to transfer data. To implement Uniform Business Practices, it is critical to also establish energy industry specific "Standardized Information Protocols" (SIPs). To minimize costs, standardized energy information protocols must integrate Internet-based technology, preferably XML, at the earliest possible date. It is vital that the energy industry be permitted to rely on both a consistent set of business practices and a consistent set of information standards that will reduce the risk of implementing new technology as markets open from state to state.

---

<sup>1</sup> NEM's "National Energy Technology Policy" was previously submitted in its March 30, 2001, request to participate in the April 24, 2001, Technical Conference in this proceeding. The full text is also available at [http://www.energymarketers.com/Documents/NEM\\_NationalEnergyTechnologyPolicyFinal.pdf](http://www.energymarketers.com/Documents/NEM_NationalEnergyTechnologyPolicyFinal.pdf).

NEM recommends the use of the Internet to transmit all energy-related information and data to the maximum extent currently practicable and also recommends immediate consideration of XML. In fact, the adoption and integration of Internet technology as the standard means for transmitting all energy-related data and information is one important step that can be taken now that can immediately lower energy costs. Standards that integrate Internet technology lower the risks of new technology investments and will help competitive suppliers and utilities render energy services to consumers at lower costs.

A virtue of using XML is to permit Internet technology that is native to most computer desktops to receive and display data easily and inexpensively, without expensive translators, using the Internet. XML is well supported by technology tools, many XML tools are license-free, and the technology is platform-independent. Furthermore, XML has been embraced by leading technology developers as a preferred language for data exchange in e-commerce. NEM asserts that the development and adoption of an energy specific protocol for XML would provide an excellent foundation for a National Energy Information Technology Standard and the Commission's adoption of an XML format for electronic filings would significantly aid in such efforts.

#### **IV. Conclusion**

For the foregoing reasons, NEM supports the Commission's proposal for standardization of tariff formats and use of an XML format for electronically filed tariffs.

Sincerely,

Craig G. Goodman  
President  
National Energy Marketers Association  
3333 K Street, NW  
Suite 425  
Washington, DC 20007

Counsel for The National Energy Marketers Association

Dated: June 21, 2001.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated: June 21, 2001  
Washington, D.C.

---

Stacey Rantala  
National Energy Marketers Association  
3333 K Street, NW  
Suite 425  
Washington, DC 20007  
(202) 333-3288