

Case No. 12-M-0476 et. al.
EDI Business/Technical Working Groups
Workpaper – Moratorium Order EDI Concepts - 8/19/2016

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Questions:

1. Over the long run, to the extent an ESCO is serving a customer, should communication of a change in the customer eligible for ESCO service status be an item communicated by the utility to the ESCO in the 814C (or another transaction)?
 - a. Or are changes in block status the item to be communicated?
2. If so, should all block status changes, including those unconnected to APP Status be communicated?

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Excerpt from
Petition for Rehearing and Clarification of the National Energy Marketers Association

10. Clarification of Technical Implementation Issues is Necessary Before a Moratorium Could Be Carried Out

If, notwithstanding the foregoing arguments, the moratorium on ESCO service to low income consumers is instituted, there are a number of technical implementation issues that must be resolved before the moratorium could be effected. The technical implementation issues include the following:

- a) NEM members are not aware of any existing EDI transaction that will allow the utilities to transmit the switch block information to ESCOs along with the requirement that the customers have to be returned to the utility.
- b) The “blind” communication of the block information by the utilities to ESCOs is likely to lead to difficulties. For instance, account numbers may not match. In addition, a customer may mistakenly be included in the block, and ESCOs will have no means to verify the accuracy of the customers included in the block.
- c) The Order does not address how current ESCO APP customers (as identified by the utilities in accordance with the Order) that are currently under a fixed term contract and that subsequently do not participate in the APP program while still on a fixed term contract will be permitted to shop, with the block removed from their account.
- d) When an enrollment is rejected, the reason for the rejection will not be known by the ESCO. If there was a mistake in the enrollment information that is unrelated to a customer’s low income status, the ESCO will not have any means to identify the correctable error and will not be able to remedy the situation.

The Commission’s resolution of these technical implementation issues, subject to stakeholder input, is critical to achieving the service moratorium in a manner that protects the interests of all consumers and facilitates meaningful, informed ESCO compliance.