

## Questions (Note that ESCO Bill Credits include APP and EPG Credits):

- 1) Regarding 750 dekatherms requirements under the Resetting Order, does it entails all meters in the customer's name; is this at the account level or customer level?

*Staff clarified that it was up to the ESCO to aggregate account information to the customer level and make the determination whether or not the customer exceeded the 750 threshold.*

- 2) Do the Utility always need to send 24 months of data on the 503 response or can it look at the history of that ESCO's 503 request and only send them most updated data?

*Utilities can provide data under either approach but should note in their Utility Maintained EDI Guides which approach they've chosen.*

- 3) Can a conceptual outline of the methodology for crediting back the POR Discount back to the ESCO for the period of the credit being issue to the customer be prepared?

*If a date range for the credit was provided, a proration could be done but that adds complexity. Previously the EDI Working Group determined that the POR Discount to be used would be the one in effect at the time the credit is processed. While less than perfect for utilities that periodically adjust their retainage amounts, the cost of perfection may be high both in terms of cost and time to develop. Since POR discount rates tend to fluctuate within a range, close enough may be good enough. Another approach may be to mirror the procedures used for cancel-rebills.*

- 4) Does the Utility need to reflect all the bill credit(s) for ESCO Bill Credit with in the 503 transaction that an ESCO previously sent over?

*At this point in time, the 503 is not designed to reflect the credit. Determining which months the credit applied (over a 12 month period, for example) could be complex and misleading. If a credit were to be reflected, it may be easier (particularly from an audit perspective) to show the entire credit, separate from the other charges, in the month during which it was processed.*

- 5) With regard to the segments that are currently being added to the 814C and 810 to reflect the ESCO Bill Credit, should we new segments be added to enable ESCOs to provide the usage period for which the crediting applies so that it can be shown on the customer bill/invoice?

*Theoretically adding dates would help address issues 3) and 4) above. If the dates were text (like a bill message) they could explain information about the credit but they would not be useful from a processing point of view. If date fields were provided, a "standard" message could be derived and the dates could potentially be useful for processing.*

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- 6) Under UBR, how does the Utility safe guard against an ESCO bundling their regular debit/credit charges with the ESCO Bill Credit with in the UBR 810 transactions (although the segments are different)? If the ESCO bundles their regular supply charges with the ESCO Bill Credit there is no way the utility will be able to unbundle these debits or credits.

*ESCOs should not be bundling credits or other charges with the commodity rate but it is difficult to prevent this from occurring (it's unclear who has the responsibility of policing improper bundling). Adding new segments/codes, etc. to distinguish non-commodity charges could be a potential resolution to this issue.*

- 7) How should the bill credit presented on the utility bill to the Customer, e.g. ESCO Bill Credit from ACME for usage period 2/1/2016 to 6/1/2016?

*The current design provides for a non-specific message indicating the type of credit but not including a time period reference. Depending upon whether the credit is provided by the ESCO currently serving the customer, the location of the credit & message would differ.*

- 8) If an ESCO is no longer active on a Utility's system, how long or at what point in time should the Utility stop accepting ESCO Bill Credits after the ESCO becomes inactive?

*The answer to this question should be aligned with the utility's cancel/rebill policy.*

- 9) How long should the utility accept ESCO Bill Credit for an account that is final in its system; e.g., what should happen if the account becomes final in the utility system before the ESCO is able to send the credit amount?

*The ESCO would have to issue the credit to the customer. To the extent the utility has a forwarding address (in the case of a move), it should provide the new address to the ESCO.*

- 10) How does the PSC propose the utilities issue ESCO Bill Credits on our bill on behalf of a Dual Billing ESCO when there are no financials (future POR payments) links to net back the credit issued to the customer? How does the utility put the credit on the transportation and delivery billing to reference a supply credit for a Dual billing ESCO? Will utilities be able to require ESCOs to sign BSA-like agreement to cover Dual Billing situations? With security deposits separate from the current required security deposit?

*Staff has previously indicated the 2/25/2014 Order in 12-M-0476 should be read to require utilities to provide the ESCO Credit on a utility bill, including the dual bill. At present, the only exception is if the utility is not issuing a bill, e.g. the customer has moved out of the territory and the account has been finalized. While not explicit authority enter into BSA-like agreements and require security has been authorized, it is reasonable to believe it would be authorized at some*

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*point. With respect to a utility putting the credit on the transportation/deliver bill to reference a supply credit for a Dual Billing ESCO adds systems development complexity to the process and does not require a POR discount adjustment.*

- 11)** Is it possible to require all ESCO mass market customers billed through Utility Consolidated Billing (UCB) only?

*This would require significant regulatory action but an alternative could be to require that mass market customers be billed under UCB unless DPS Staff qualified the ESCO to issue bills under the UBPs (presumably Staff would want enhanced reporting and auditing requirements). An ESCO that qualifies to bill mass market customers would issue credits directly to their customers; the utility billing system would not be involved.*

- 12)** Will all rate-ready UCB utility be required to switch to Utility Bill Ready?

*This should be a business decision for each rate ready utility but it is not unreasonable to expect that rate ready as it exists today would need to be enhanced.*

- 13)** For mass market customers being billed under Dual Billing, has any thought been given consequences of the ESCO having to provide a bill credit to customer (to be shown on the utility delivery-only bill) that may owe a huge debit balance with the ESCOs? Can the ESCO a bill credit on its commodity bill to reduce the arrearage?

*This is an unresolved issue that disappears if an ESCO that bills its commodity is qualified to issue credits to customers. Presumably, a credit to reduce a debit balance would be reported to the Staff under whatever guidelines they set up to qualify ESCOs to bill mass market customers.*