STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

CASE 19-M-0463 – In the Matter of Consolidated Billing for Distributed Energy Resources.

CASE 15-E-0082 – Proceeding on Motion of the Commission as to the Policies, Requirements and Conditions For Implementing a Community Net Metering Program.

CASE 14-M-0224 – Proceeding on Motion of the Commission to Enable Community Choice Aggregation Programs.

DEPARTMENT OF PUBLIC SERVICE STAFF PROPOSAL ON COMMUNITY DISTRIBUTED GENERATION BILLING AND CREDITING PERFORMANCE METRICS AND NEGATIVE REVENUE ADJUSTMENTS

Dated: January 16, 2024

INTRODUCTION AND BACKGROUND

Community Distributed Generation (CDG) is a program that enables customers for whom rooftop solar is not a viable option to directly participate in a renewable energy program. In a CDG program, a CDG Sponsor develops an eligible generation project, usually a solar photovoltaic (PV) system, connected to a utility distribution network, and enrolls a group of customers served by that utility as subscribers. The CDG project generates electricity and injects that electricity into the utility system, and the utility compensates the injections by crediting the bills of the subscribers to that CDG project. The subscribers pay the CDG Sponsor a monthly subscription charge, which may be fixed or variable, in return for the benefit of credits they receive. Typically, the CDG Sponsor bills the customer directly for the subscription charges, while the utility bills the customer for electric service reflecting the credits received from the CDG project. As an alternative, CDG Sponsors have the option to switch to the Net Crediting model, described further below, which provides for consolidated utility billing of CDG credits and subscription fees.

On December 12, 2019, the Public Service Commission (Commission) adopted a Net Crediting model for consolidated billing for CDG subscribers.[1] Consolidated billing was implemented to reduce soft costs such as customer management costs, and in particular billing and collection costs, associated with CDG projects for greater customer participation in the program. Further, consolidated billing benefits customers who often find it confusing and cumbersome to pay two energy bills and may have reservations about submitting financial information to a third party other than a utility. Under the Net Crediting model, the utility adds the CDG Sponsor's monthly subscription charges to the utility bills of the CDG subscribers and provides the CDG subscribers with credits on their electric bills equivalent to the value the customers receive from the CDG Sponsor reduced by the amount the customers would owe the CDG Sponsor for the subscription fee. The utility then remits the subscription fees, minus a utility administrative fee, to the CDG Sponsor. The Commission directed utilities to implement Net Crediting by January 1, 2021.

On September 15, 2022, the Commission issued the Order Establishing Process Regarding Community Distributed Generation in response to concerns expressed by Department of Public Service Staff (Staff) and CDG stakeholders surrounding serious delays in the implementation of automated utility billing of CDG.[2] Additionally, the September 2022 Order recognized that there have been ongoing issues with respect to: (1) customers not receiving a utility bill for several months and later receiving multiple bills within a short period, or a single very high bill for that extended period; (2) CDG members not receiving appropriate credits on their bills; and (3) utility billing deficiencies that impact the CDG Sponsor's ability to bill and collect payments from the utilities and/or customers which has resulted in CDG Sponsor capital

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1 Case 19-M-0463, Consolidated Billing for Distributed Energy Resources, Order Regarding Consolidated Billing for Community Distributed Generation (issued December 12, 2019).

2 Case 19-M-0463, Order Establishing Process Regarding Community Distributed Generation (issued September 15, 2022) (September 2022 Order).

issues and, in some instances, default on their contractual obligations to their customers and project funding sources. These issues negatively impact customers' experience with CDG participation, and may result in customers leaving a program or declining to enroll in a program in the first instance. As such, these issues impact the overall success of CDG statewide and the benefits it can provide, including cost savings to customers and advancement of the State's clean energy goals.

The September 2022 Order noted that there are "potential benefits in establishing CDG billing metrics to track and evaluate utilities' performance in billing for CDG."[3] The Commission directed Staff and stakeholders to work collaboratively to develop, for Commission consideration, a negative revenue adjustment (NRA) mechanism tied directly to the utilities' CDG billing and crediting performances. To that end, Staff was directed to conduct a stakeholder conference within 30 days of the September 2022 Order's effective date. Staff conducted stakeholder conferences on November 9, 2022, and February 27, 2023. At both conferences, presentations were given from industry stakeholders, including CDG developers, distribution utilities, and Community Choice Aggregation Administrators. Specifically, the New York Solar Energy Industries Association (NYSEIA)/Coalition for Community Solar Access (CCSA), and the Joint Utilities[4] put forth NRA proposals for discussion at those conferences. Building on those proposals and discussions from these stakeholder conferences, Staff developed this proposal for the establishment of CDG billing and crediting performance metrics, with associated NRAs.

STAFF PROPOSAL

Staff recommends six CDG performance metrics with associated NRAs that would incent improvements to the CDG billing processes: (1) Billing and Crediting Accuracy; (2) Accuracy of the Total Value of the Credits Earned Across the Service Area; (3) Accurate Application of Billing Credits; (4) Customer Complaints Regarding Transfer, Billing, and Crediting Timelines; (5) Utility Response Time to Allocation Lists; and (6) Utility Response Time to Host Communications. Staff proposes these metrics and associated NRAs to stand alone and be independent of any existing metrics and NRAs adopted by the Commission. Additionally, Staff proposes utilities provide a $10 per month bill credit for failure to provide bill credits in a timely fashion, quarterly reporting of billing and crediting performance, and quality assurance protocols as explained in more detail below. Detailed descriptions of the calculations for each proposed metric are included in Appendix A. The performance metrics below and in Appendix A are

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[3] Id., p. 4.

[4] For purposes of this proposal, the Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation d/b/a National Grid (National Grid), Orange and Rockland Utilities, Inc. (O&R), and Rochester Gas and Electric Corporation (RG&E).

designed to measure various activities and when performance targets are not met, assess negative revenue adjustments. Any negative revenue adjustments will be deferred for the benefit of customers in a manner to be determined by the Commission in a subsequent rate proceeding.

Staff proposes a maximum basis point exposure of 41 basis points. In determining a maximum basis point exposure Staff considered several factors including: the input received from stakeholders, review of the proposals provided at the stakeholder conferences, review of CDG customer complaints, impacts on the CDG developer industry, a review of the level of negative revenue adjustments currently employed for other critical aspects of the utilities' operations, and the potential financial ramifications to distribution utilities and ratepayers. The proposed negative revenue adjustments should be sufficient to incentivize the utilities to invest/expend the resources necessary to avoid CDG customer billing and crediting issues which may cause customers to leave the program and/or deter future participation in potentially beneficial programs. Staff proposes these basis point levels as reasonably weighing these concerns, but specifically seeks stakeholder input on the appropriateness of the total basis point exposure proposed, and the allocation of the total basis point exposure among the various metrics Staff proposes.

A. Billing and Crediting Accuracy Metrics for Utility Negative Revenue Adjustments

Staff defines accuracy, or an accurate bill, to mean that the CDG subscriber receives the correct number of monetized credits based on the system production for that month at the percentage of production that the subscriber has been allocated and agreed to. This metric is also applicable to the Value of Distributed Energy Resources (VDER) credits a subscriber was supposed to be allocated per the Host allocation agreement.[5] A definite time period in which the utilities would be able to measure accuracy (before and after automation) is needed in order to implement NRAs associated with this accuracy metric.

1. The first accuracy metric is based on the percentage of accounts that experienced inaccurate credit transfers and credit banking transfers across the utility territory. Inaccurate is defined as a credit transfer which has a three percent or more variance from the correct credit. The proposed NRAs related to this metric are shown below.

Table 1. Overall Accuracy of Crediting Customer Accounts Based on Total Percentage of Inaccurate Transfers

Percent of CDG Accts with Inaccurate CR Transfers	Basis Points at Risk
>0.2%, ≤0.4%	2.5
>0.4%, ≤0.5%	5
>0.5%	7.5

[5] For the purposes of this proposal, references to "VDER" include both Phase One Net Energy Metering (NEM) and Value Stack compensation projects.

2. The second accuracy metric is based on the accuracy of the total value of the credit transfer and the percentage difference between the correct credit transfer amount and the actual credit transfer amount across the utility territory. An NRA would be assessed when the difference between the total correct credit transfer amount and the actual amount credited is greater than five percent across all customers within the utility service area. The proposed NRAs related to this metric are shown below.

Table 2. Accuracy of Credit Transfers Across Utility Service Area

Total/Overall Transfer Credit Delta	Basis Points at Risk
> 5%, ≤10%	5
>10%, ≤20%	10
>20%	15

NYSEIA identified several new data requirements, which they believe to be necessary, that should be collected and reported by each utility in order to calculate the performance metrics discussed above. Staff agrees with these data requirements and proposes that the utilities collect and report the following information:

- Transfer Credit on Final Host Report/Credit Report;
- Applied Credit amount counted toward a customer's electricity usage as seen on the utility bill;
- Initial Month's Applicable Banked Credit Amount, which changes on a monthly basis depending on how much of the credit is consumed versus applied to the customer's credit bank and Final Month's Applicable Banked Credit Amount; and
- Satellite Bill Amount, provided in the Host Report.

3. The third accuracy credit metric determines and measures whether the full amount of the credit earned by the customer has been correctly applied and not banked inappropriately. This could have a negative financial impact on the subscriber because there is no way to monetize banked credits if they cannot be applied moving forward. The proposed NRAs related to this metric are shown below.

Table 3. Subscriber Banked Credit Accuracy Metric

Percent of CDG Accts with shortage of credits applied	Basis Points at Risk
>0.2%, ≤0.3%	1
>0.3%, ≤0.4%	2.5
>0.4%	4

Staff proposes the following new data requirements, which are necessary, be collected by each utility in order to calculate the accuracy performance metrics discussed above:

- Customer bill amount before credits are applied;
- Customer/subscriber bank balance before credits are applied;
- Transfer credit value ($);
- Customer bill amount after credits are applied; and
- Customer/satellite bank balance after credits are applied.

The utilities would use this data to calculate their performance on credit accuracy, which would be reported to the Commission to determine any appropriate NRA. As proposed by Staff, the Commission would require the utilities to provide underlying data regarding their performance as part of the audit process discussed further below.

B. Billing Credit Timeliness

4 The fourth metric has two parts and is focused on incentivizing utilities to provide timely billing credits. The first part of the metric relates to billing credit timelines and is based on the percentage of Value Stack customers that have not had the full amount of monthly bill credits applied to their utility bill within 75 days from the end of the Value Stack generator's applicable billing period. The proposed NRAs related to this metric are shown below.

Table 4. Billing Credit Timeliness

Percent of Value Stack customers that have not received monthly bill credits within 75 days	Basis Points at Risk
>2%, ≤3%	1
>3%, ≤4%	2.5
>4%	4

The second part of this metric proposes a real-time customer credit for delayed Value Stack credit applications. In addition, or as an alternative, to the basis point based Billing Credit Timeliness metric discussed above, Staff proposes that Value Stack customers that have not had the full amount of monthly bill credits applied to their utility bill within 75 days from the end of the Value Stack generator's applicable billing period receive an additional bill credit of $10 per month (Monthly Credit) for each month following the expiration of the 75-day period until the Value Stack credits are applied in full. The proposed $10 Monthly Credit would be subject to the following conditions:

- Monthly Credit would not impact the Value Stack credits to which the customer is entitled.

- The cost of Monthly Credits would be the responsibility of the utility's shareholders and not be recovered from customers via reconciliation, the revenue decoupling mechanism, deferral, surcharge, or other mechanism.
- The utility would not provide the Monthly Credit to customers in instances where the delay in crediting is caused by the Host not timely providing the utility with an up-to-date subscriber list and/or allocations.
- The utility would create communications to subscribers to inform them that they will be eligible for the Monthly Credit if they have not received complete application of bill credits within the 75-day period, and that the Monthly Credits will be provided at the same time the Value Stack bill credits are provided.

C. Communication Response Rate

It is imperative that the utilities and CDG Sponsors have timely communications related to providing CDG services to end-use customers. Responsiveness issues can arise with respect to communications involving list submissions, and questions/complaints regarding customer issues, billing, crediting problems, etc. Communication response times and rates should be tracked so that timeliness standards can be specified, and to determine whether an NRA should be assessed. Staff proposes that the utility track the following data to establish such standards:

- Utility response time to allocation list submission.
- Utility response time to questions/complaint.

In addition to timely responses to questions/complaints and allocation list submissions, it is important that utilities first acknowledge that they have received a question/complaint or allocation list submission. Therefore, Staff proposes tracking confirmation timeliness as a scorecard metric. It is also important that the utility quickly reject any request/question or allocation list submission that was not formatted correctly so that the Host can resubmit the information in a timely manner. Thus, Staff also proposes tracking reject notification timeliness as a scorecard metric.

5. The fifth metric relates to the time frame or response rate in which the utility responds to Host allocation list submissions. For clarity, a successful response rate would be calculated by dividing the number of successful responses (numerator) by the number of allocation list submissions (denominator).

The corresponding proposed target response rates for utility responses is the following:

- Utility completed response to allocation list submission from Host - 5 business days.

For the purpose of this fifth metric, Staff proposes the following definitions of response time:

> Response Time: Allocation list submission response time is the amount of time required for successfully completed responses to communications regarding allocation list submissions, and problems. Successful completed responses to communications related

to allocation list submissions are those where the requested information was returned to the requestor. Response time is measured from the time of receipt of the request at the utility's interface to the time that the response is sent to the CDG Sponsor.

Percent of Communications/Submissions Responded to On-Time: The percentage of allocation list submission communications responses completed within the timeframes as specified in the performance standard described above. (i.e., within 5 business days for allocation list submissions.)

Table 5 below lists the proposed NRAs associated with this metric.

Table 5. Timeliness of Responses
Related to Allocation List Submissions

% Communication Response Not On-Time	Basis Points at Risk
>2%, ≤ 5%	2.5
>5%, ≤ 8%	5
>8%	7.5

In addition, the following standards should be followed for these other allocation list communications related activities. Performance on these items would be tracked via scorecard reporting. It should be noted these standards would not be subject to an NRA.

- Utility resolution plan to allocation list submission - 5 business days to issue resolution or a plan to get to resolution if the issue cannot be resolved within 3 business days;
- CDG sponsor allocation lists confirmed as being received by the utility on time – 1 business day; and
- CDG sponsor allocation lists submissions rejected on-time – 1 business day.

6. The sixth metric relates to the time frame or response rate in which the utility responds to Host and customer communications. For clarity, a successful response rate would be calculated by dividing the number of successful responses (numerator) by the number of host and customer questions (denominator).

The corresponding proposed target response rates for utility responses is the following:

- Utility completed response to customer and Host specific questions as presented by the CDG Sponsor or customer - 2 business days.

For the purpose of this sixth metric, Staff proposes the following definitions of key responsiveness terms:

Response Time: Response time is the amount of time required for successfully completed responses to communications regarding customer issues, and billing and crediting problems. Successful completed communications responses are those where the

requested information was returned to the requestor. Response time is measured from the time of receipt of the request at the utility's interface to the time that the response is sent to the CDG Sponsor or customer.

Percent of Communications Responded to On-Time: The percentage of communications responses completed within the timeframes as specified in the performance standards described above. (e.g., within 2 business days for customer specific questions.)

Table 6 below shows the NRA associated with this metric.

Table 6. Timeliness of Response Completion to Communications Related to Questions

% Communication Response Not On-Time	Basis Points at Risk
>2%, ≤5%	1
>5%, ≤8%	2
>8%	3

In addition, the following standards should be followed for these other Host or customer communications related activities. Performance on these items would be tracked via scorecard reporting. It should be noted these standards would not be subject to an NRA.

- Utility resolution plan to question submission - 5 business days to issue resolution or a plan to get to resolution if the issue cannot be resolved within 3 business days;
- CDG sponsor or customer question submissions confirmed as being received by the utility on-time – 1 business day; and
- CDG sponsor or customer question submissions rejected on-time – 1 business day.

D. Quarterly And Annual Reporting

Staff proposes that the utilities report to the Secretary to the Commission on a quarterly basis, 30 days after the end of each calendar quarter,[6] information regarding the utilities' CDG billing and crediting performance, displaying the metrics for each of the prior three months. Appendix B includes a listing of the specific data points to be included in these reports. Additionally, attached to this Staff Proposal as Appendix C is a Template for the utilities to utilize in compiling quarterly and annual reports. This reporting is similar to "Scorecard" reporting required by the Department of Public Service (DPS) for other programs including Energy Efficiency and will enable DPS to chart progress toward CDG goals and respond to requests from ratepayers, state agencies, and elected and municipal officials. This information will also provide important substantiating information to Staff for review and/or audit of the

[6] The calendar quarters end the months of March, June, September, and December.

progress utilities are undertaking towards successful CDG implementation. In addition to quarterly reporting on progress toward the six proposed annual performance metrics above, the quarterly scorecard reporting will require related information which will provide a more complete picture of the ongoing status of CDG billing and crediting performance. This will include reporting on some of the underlying data that will be used to calculate the proposed performance metrics (e.g., numerators and denominators), as well as related information on milestones for completing the CDG billing and crediting activities measured by the annual performance metrics (e.g., timeliness of communications receipt confirmations).

In addition to quarterly reporting, Staff proposes that the utilities file annual reports by February 1 of each year, utilizing the same Template as that utilized for quarterly reporting. Included in the annual reporting should be the total dollars associated with each performance metric.

Also, it should be noted that the monthly reported percentages associated with the performance metrics on the quarterly report cannot be simply averaged to produce the annual performance metric results. The annual performance metrics will be based on percentages calculated as the total of substandard measured items for that performance metric in a year, divided by the total of all the measured items for that performance metric in a year (i.e., a weighted average).

Finally, regarding the electronic reporting templates, Staff proposes a Template, included as Appendix C, to be used by all utilities in quarterly and annual reporting. Utilities should not change the Template (adding /removing columns, changing formulas, changing cell formatting, removing worksheet tabs, etc.). Submitted filings should be a populated copy of the Template with the same format. Appendix B contains a complete list of the items to be included in the annual and quarterly reports.

E. Quality Assurance/Auditing

Staff proposes that the utilities establish an internal process to ensure the quality of the metrics being reported, including a requirement that the data be retained and be made available for subsequent third party and/or DPS audits, if warranted. On an annual basis, Staff proposes that each utility file a quality assurance report and attestation letter signed by an officer of the company.

Under this proposal, Staff and/or it's designee may, at any time, conduct an inquiry of selected portions of the reported performance data to assess whether a utility is accurately recording and reporting the information. Staff and/or it's designee, may conduct Metric Replication to assure that the data reported in the monthly reports accurately reflects the performance metric results being reported using the technical definitions for each metric

calculation.[7] Metric Replication evaluates the utilities' metrics process by attempting to recreate its performance metrics using underlying data from the utilities' Information Technology systems. Metric Replication relies on mathematical techniques to verify and validate. The objective is to independently recreate the utilities' performance metrics. Upon request, the utilities should provide in a usable format, each of the underlying data (flat files) used to calculate the performance for that CDG Sponsor and the performance metric algorithms for each reported CDG billing and crediting metric. Additionally, Staff and/or it's designee may conduct other studies with the data provided to ensure the proper implementation of the CDG program.

F. Exceptions and Waiver Process

Recognizing that reported CDG billing and accuracy performance data may be influenced by factors beyond the utilities' control, a utility may file exception or waiver petitions with the Commission seeking to have the monthly performance results modified. Staff proposes that any such request should include specific grounds justifying an exception or waiver and provide any supporting documentation underlying their request. Staff recognizes that the performance requirements proposed by these standards establish the quality of CDG billing and crediting performance under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storm, or other events beyond the utility's control.

Staff proposes that any waiver request identify: (1) the extraordinary nature of the event, (2) the impact of the event on the utility's CDG billing and crediting service quality, (3) the reasons why reasonable preparations for the event proved inadequate; and (4) the specific days affected by the event. In addition, the request must also include an analysis of the extent to which the event affected performance levels established above.

G. Three Year Review

Staff proposes that the Commission adopt these CDG performance metrics, with the associated NRAs, but recognizes that these metrics and NRAs may need adjustment in the future to ensure that are incenting the correct performance and not imposing unintended consequences on the utilities. Additionally, given that the utilities do not currently track and report the information necessary to gauge compliance with these metrics, there exists some uncertainty at this time regarding the optimum standards each metric should establish as well as how many basis points should be at risk for each. For these reasons, Staff proposes that the Commission establish a three-year review process whereby the implementation of these performance metrics and associated NRAs is evaluated within three years from any Commission order adopting CDG

[7] Metric Replication means independently recalculating the reported metric results from an underlying data file containing data on the individual activities being measured. For instance, a reported percentage of bills credited on time could be replicated.

performance metrics and NRAs. As part of this review process, Staff would review the utility reporting discuss above as well as the level of NRAs that have been imposed during the initial three-year period and make recommendations, if necessary, regarding the upward or downward adjustment of either the performance metrics themselves, the NRAs associated with those metrics, or both.

CONCLUSION

This Staff proposal responds to utility billing deficiencies related to CDG projects which have resulted in numerous erroneous customer bills, serious delays in crediting customers for their share of CDG generation credits, and in some cases failure to pay CDG Sponsors in a timely manner. The proposed performance metrics and associated NRAs described herein are a continuation of the process directed by the Commission including ongoing discussions with solar industry personnel, utilities, and other stakeholders.[8] Staff submits this proposal for public comment and Commission consideration.

[8] See, September 2022 Order.

Metric Calculation

This appendix provides a detailed description of the calculations of the CDG Billing and Crediting Metrics discussed above.

Metric 1. Overall accuracy of crediting customer accounts based on total percentage of inaccurate transfers

a) Identify the number of accounts in which a credit transfer from the Host statement to the corresponding customer account contained a variance greater than 3% from the correct amount. This includes situations in which the credit transfer was less than or more than what the actual credit should have been.

b) The time frame in which to calculate this accuracy metric is on bills rendered to customers on January 1 through December 31.

c) Divide the number of instances of inaccurate transfers in step a) by the average total number of CDG accounts during the 18-month period. The average number of total accounts for the 18-month period is calculated by summing the number of CDG accounts at the end of each month and dividing by 18.

Metric 2. Accuracy of credit transfers across utility service area

This metric is designed to address the accuracy of the credits transferred to a customer. To do this, the utilities must track and measure, on a customer basis, the delta between the credit value on the Host report and that of the value that is transferred to the customer's account. The value that is transferred to the customer shall include credit amount applied to the customer's monthly energy consumption in addition to any credit amount that is banked.

The time frame in which to calculate this accuracy metric is on credits transferred to customers on January 1 through December 31.

Metric 3. Subscriber Banked Credit Accuracy

The Subscriber Banked Credit Accuracy Metric shall reflect the delta between a) the applicable credit value that appears on a customer's bill; and b) the maximum credit value that the satellite could have received. The satellite account would consume the full value of its share of the total credits generated, not to exceed the satellite customer's total bill amount.

The time frame in which to calculate this accuracy metric is on credits transferred to customers on January 1 through December 31.

Metric 4. Bill Credit Timeliness

This metric measures billing credit timelines and is based on the percentage of Value Stack customers that have not received a complete application of monthly bill credits within 75 days, as measured from the end of the Value Stack generator's applicable billing period.

The denominator of this metric is the total number of Value Stack customers that are due a complete application of monthly bill credits within 75 days.

The 75-day interval is the elapsed timed (in days) measured from the timestamp of when service is rendered to when the bill is rendered.

The numerator of this metric is the number of Value Stack customers that have not received a complete application of monthly bill credits within 75 days.

For monthly reporting, the numerator of this metric should also equal the number of customers that received an additional bill credit of $10 per month (Monthly Credit) for each month following the expiration of the 75-day period until the Value Stack credits are applied in full.

The time frame in which to calculate this timeliness metric is on bills credited or transferred to customers on January 1 through December 31.

Metric 5. Timeliness of Utility Responses to Communications Related to Allocation List

This metric measures the time to respond to an allocation list submission made by the Host. For the purpose of this fifth metric, Staff proposes the following definitions of key responsiveness terms:

Response Time: Response time is the amount of time required for successfully completed responses to allocation list submissions, customer issues, and billing and crediting problems. Successful completed communications/submission responses are those where the requested information was returned to the requestor.

Confirmation: A communication sent back to the Host and/or customer confirming that the communications/submission was received by the utility and is being processed.

Rejected Communications/Submission: A rejected communications/submission cannot be processed successfully due to incomplete or invalid information submitted by the CDG Sponsor, which results in an error message back to the CDG Sponsor.

Communications Response Time Related to Allocation List Submissions: Response time is measured from the time of receipt of the request at the utility's interface to the time that the response is sent to the CDG Sponsor. The amount of elapsed time (in hours and minutes) between receipt of a valid allocation list (utility communication interface time stamp) and distribution of a response to that submission. Rejected allocation list submissions will have the clock re-started upon receipt of a valid submission.

Communications Confirmation Response Time: The amount of elapsed time (in hours and minutes) between receipt of a valid allocation list submission (utility communication interface

time stamp) and distribution of a submission confirmation. Rejected allocation list submissions will have the clock re-started upon receipt of a valid submission.

Note: Allocation list submissions confirmations are considered distributed at the time the utility sends a submission confirmation. If a confirmation is resent, and the problem with sending the confirmation was within the utility's systems, then the time stamp will be the last time stamp. If the submission confirmation was resent because the problem is at the CDG Sponsor end (e.g., CDG Sponsor systems could not receive transactions), the time stamp is the first time the confirmation was sent.

For Electronic Data Interchange (EDI) submissions, the notification is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the CDG Sponsor.

Percent of Allocation list Submissions Confirmed On-Time: The percentage of list submissions confirmed within the agreed upon timeframes as specified in the Performance Standards.

Confirmation Response Time: Confirmation response time is the amount of time elapsed for successful confirmation communication regarding receipt of list submissions.

Successful confirmation allocation lists are those where the utility confirmed receipt of the allocation list from the CDG Sponsor and the CDG Sponsor received acknowledgement of its list submission. Submission of lists must be acknowledged by the utility regardless of whether they are rejected by the utility or subsequently worked on by the utility.

Confirmation Response time is measured from receipt of the request at the utility's interface to the time that the confirmation/acknowledgement response is sent to the CDG Sponsor.

Rejected Allocation List Submission: A rejected allocation list submission cannot be processed successfully due to incomplete or invalid information submitted by the CDG Sponsor, which results in an error message back to them.

Reject Notification Response Time is measured as the amount of elapsed time (in hours, and minutes) between receipt of an allocation list submission and the time the reject notice was sent to the CDG Sponsor.

Percent of Submissions Rejected On-Time: The percentage of submissions rejected within the agreed-upon timeframes as specified in the performance standards.

Notes: (1) Rejected Submissions (submissions failing basic front-end edits) are not included in the calculation of list confirmation response time.

Normal exclusions include Saturday, Sunday, and major holidays, as well as hours outside of the normal report period. The major holidays are: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

The time frame in which to calculate this timeliness metric is on allocation lists sent back to CDG Sponsors on January 1 through December 31.

Metric 6. Timeliness of Utility Responses to Questions/Complaints

This metric measures the time to respond to a communication/question related to customer issues, billing, and crediting problems. For the purpose of this sixth metric, Staff proposes the following definitions of key responsiveness terms:

Response Time: Response time is the amount of time required for successfully completed responses to questions/communications regarding customer issues, and billing and crediting problems. Successful completed communications/submission responses are those where the requested information was returned to the requestor.

Percent of Communications/Submissions Responded to On-Time: The percentage of communications/submissions completed within the agreed-upon timeframes as specified in the performance standards (e.g., 98% on time).

Confirmation: A communication sent back to the Host and/or customer confirming that the communications/question was received by the utility and is being processed.

Rejected Communications/question: A rejected communications/question cannot be processed successfully due to incomplete or invalid information submitted by the provider, which results in an error message back to the CDG Sponsor.

Communications Response Time Related to Questions/Complaints: Response time is measured from the time of receipt of the request at the utility's interface to the time that the response is sent to the CDG Sponsor. The amount of elapsed time (in hours and minutes) between receipt of a valid question or complaint (utility communication interface time stamp) and distribution of a response to that question or complaint. Rejected communications will have the clock re-started upon receipt of a valid communication.

Communications Confirmation Response Time: The amount of elapsed time (in hours and minutes) between receipt of a valid communication (utility communication interface time stamp) and distribution of a communication confirmation. Rejected communications will have the clock re-started upon receipt of a valid communication.

Note: Communications are considered distributed at the time the utility sends a communication confirmation. If a confirmation is resent, and the problem with sending the confirmation was within the utility's systems, then the time stamp will be the last time stamp. If the communication confirmation was resent because the problem is at the CDG Sponsor end (e.g., CDG Sponsor systems could not receive transactions), the time stamp is the first time the confirmation was sent.

For EDI submissions/communications, the notification is considered sent when it is time-stamped after EDI translation and encryption, immediately prior to transmission to the provider.

Percent of Communications Confirmed On-Time: The percentage of communications confirmed within the agreed upon timeframes as specified in the Performance Standards.

Confirmation Response Time: Confirmation response time is the amount of time elapsed for successful confirmation communication regarding receipt of customer questions regarding billing, and crediting problems.

Successful confirmation communications are those where the utility confirmed receipt of inquiries from the CDG Sponsor and the CDG Sponsor received acknowledgement of its inquiry of the requested information. Inquiries must be acknowledged by the utility regardless of whether they are rejected by the utility or subsequently worked on by the utility.

Confirmation Response time is measured from receipt of the request at the utility's interface to the time that the confirmation/acknowledgement response is sent to the CDG Sponsor.

Rejected Communications/Submission: A rejected communications cannot be processed successfully due to incomplete or invalid information submitted by the CDG Sponsor, which results in an error message back to them.

Reject Notification Response Time is measured as the amount of elapsed time (in hours, and minutes) between receipt of a provider submission or inquiry and the time the reject notice was sent to the CDG Sponsor.

Percent of Submissions Rejected On-Time: The percentage of submissions rejected within the agreed-upon timeframes as specified in the performance standards.

Notes: (1) Rejected Submissions (submissions failing basic front-end edits) are not included in the calculation of completed response time or confirmation response time.

Normal exclusions include Saturday, Sunday, and major holidays, as well as hours outside of the normal report period. The major holidays are: New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.

The time frame in which to calculate this timeliness metric is on questions/complaints responded to on January 1 through December 31.

Annual and Quarterly Reporting Items

Staff proposes that utilities report on the following data points with respect to the overall CDG population:

- The total number of CDG projects each month of the reporting period (Scorecard, Quarterly Reports);
- The number of CDG projects for which the utility generated credits each month of the reporting period (Scorecard, Quarterly Reports);
- The total number of CDG project credit transfers each reporting period Performance Metric 1, Quarterly & Annual Reports);
- The number of inaccurate transfers for CDG projects for which the utility generated credits in the reporting period (Performance Metric 1, Quarterly & Annual Reports);
- The percentage of inaccurate transfers for CDG projects for which the utility generated credits in the reporting period (Performance Metric 1, Quarterly & Annual Reports);
- The total number of CDG subscribers each month of the reporting period (Scorecard, Quarterly Reports);
- The number of Energy Affordability Program (EAP) and non-EAP CDG subscribers each month of the reporting period (Scorecard, Quarterly Reports);
- The number of CDG subscribers who had a credit applied to their bill each month of the reporting period (Scorecard, Quarterly Reports);
- The total dollar value of CDG credits generated each month of the reporting period (Performance Metric 2, Quarterly & Annual Reports);
- The transferred total dollar value of CDG credits generated each month of the reporting period (Performance Metric 2, Quarterly & Annual Reports);
- The transferred percentage of the total dollar value of CDG credits generated each month of the reporting period (Performance Metric 2, Quarterly & Annual Reports);
- The total number of subscribers with credits applied during the reporting period (Performance Metric 3, Quarterly & Annual Reports);
- The number of subscribers with credits not applied within two months of being allocated (Performance Metric 3, Quarterly & Annual Reports);
- The percentage of subscribers with credits not applied within two months of being allocated (Performance Metric 3, Quarterly & Annual Reports);
- For the entire reporting period, the total number of CDG subscribers who received a Monthly Credit (Scorecard, Quarterly Reports);
- Total number of Value Stack customers that are due a complete application of monthly bill credits within 75 days (Performance Metric 4a, Quarterly & Annual Reports);
- Number of Value Stack customers that have not received a complete application of monthly bill credits within 75 days (Performance Metric 4a, Quarterly & Annual Reports);
- Percentage of Value Stack customers that have not received a complete application of monthly bill credits within 75 days (Performance Metric 4a, Quarterly & Annual Reports);

- Number of customers that received an additional bill credit of $10 per month ("Monthly Credit") for each month following the expiration of the 75-day period until the Value Stack credits are applied in full (Performance Metric 4b, Quarterly & Annual Reports);
- The total number of allocation list submissions (Performance Metric 5, Quarterly & Annual Reports);
- The number of allocation list submissions responded to on-time (Performance Metric 5, Quarterly & Annual Reports
- The percentage of allocation list submissions responded to on-time (Performance Metric 5, Quarterly & Annual Reports);
- The number of allocation list submissions confirmed as being received by the utility (Scorecard, Quarterly Reports);
- Number of allocation list submissions confirmed as being received on-time (Scorecard, Quarterly Reports);
- Percentage of allocation list submissions confirmed as being received on-time (Scorecard, Quarterly Reports);
- The number of allocation lists rejected (Scorecard, Quarterly Reports);
- The number of allocation lists rejected on-time (Scorecard, Quarterly Reports);
- The percentage of allocation lists rejected on-time (Scorecard, Quarterly Reports);
- The number of utility resolution plans to allocation list submission to get to resolution if the issue cannot be resolved (Scorecard, Quarterly Reports);
- The number of utility resolution plans to allocation list submissions issued on-time (Scorecard, Quarterly Reports);
- The percentage of utility resolution plans to allocation list submissions issued on-time (Scorecard, Quarterly Reports);
- The total number of CDG Sponsor or customer question submissions (Performance Metric 6, Quarterly & Annual Reports);
- The number of CDG Sponsor of customer questions responded to on time (Performance Metric 6, Quarterly & Annual Reports);
- The percentage of CDG Sponsor of customer questions responded to on time (Performance Metric 6, Quarterly & Annual Reports);
- The number of CDG Sponsor or customer question submissions confirmed as being received by the utility (Scorecard, Quarterly Reports);
- Number of CDG Sponsor or customer question submissions confirmed on-time (Scorecard, Quarterly Reports);
- Percent of CDG Sponsor or customer question submissions confirmed on-time (Scorecard, Quarterly Reports);
- The number of CDG Sponsor or customer question submissions rejected (Scorecard, Quarterly Reports);
- The number of CDG Sponsor or customer questions rejected on-time (Scorecard, Quarterly Reports);
- The percentage of CDG Sponsor or customer questions rejected on-time (Scorecard, Quarterly Reports);

- The number of utility resolution plans issued to CDG sponsor or customer question submissions if the issue cannot be resolved within 3 business days (Scorecard, Quarterly Reports);
- The number of utility resolution plans to CDG sponsor or customer question submissions issued on-time (Scorecard, Quarterly Reports); and
- The percentage of utility resolution plans to CDG sponsor or customer question submissions issued on-time (Scorecard, Quarterly Reports).

Finally, the Annual Reports will include a reporting of the dollar value of a basis point for the reporting company and a calculation of the overall dollar amounts of NRAs for each Performance metric. The Annual Reports will also include a reporting of the total dollar value of the $10 per month bill credits paid to customers related to failure apply Value Stack credits in full within the 75-day period.

REPORTING TEMPLATE IN EXCEL FORMAT FILED SEPERATELY
IN DMM AS “CDG METRIC-NRA REPORTING TEMPLATE”