

Subj: **RGQ/REQ Request for Comments due Nov. 21, 2003 on Model Business Practices**
Date: 11/20/2003 8:23:21 AM Central Standard Time
From: Bill Barkas
To: NAESB REQ & RGQ Executive Committees

Below are comments by Dominion Retail, Inc. on the model business practices documents regarding billing and payments to be considered by the REQ and RGQ Executive Committees December 10 in Houston. These comments apply to BOTH quadrants' proposed model business practices.

Under the section entitled "Payment Obligation and Options" (located toward the bottom of page 21 of the REQ document and page 20 of the RGQ document) the following sentences currently read as follows:

"Specify the level of uncollectibles to be reflected in the amount due for Assumption of Receivables method, if applicable."

"Specify the conditions to change the level of uncollectibles to be reflected in the amount due for Assumption of Receivables method, is applicable."

RECOMMENDED CHANGE #1: In the second sentence there appears to be a typographical error. The phrase "is applicable" should read "if applicable" as it correctly reads in the first sentence.

RECOMMENDED CHANGE #2: The word "uncollectible" is used in both sentences, but should be substituted with the word

"discount." The word "uncollectible" is a more limited term; whereas the word "discount" is used in typical supplier-utility Account Receivables Purchase Agreements because it is a more encompassing and accurate word.

For example, "discount" includes not only uncollectibles but other items such as the time-value-of-money and arrearages that are considered essential elements in A/R agreements between retail energy suppliers and utilities. Consequently, it is more appropriate to use the word "discount" that is already an accepted term in the retail energy industry.

COMMENTS SUBMITTED BY:

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