

WAL★MART®

SAM M. WALTON DEVELOPMENT COMPLEX * ENERGY DEPARTMENT #0550 * 2001 S.E. 10TH STREET
BENTONVILLE, AR 72716 - 0550 *

Rae McQuade
NAESB, Executive Director
1301 Fannin, Suite 2350
Houston, TX 77002

Re: Request for Initiation of a NAESB Business Practice Standard: Standardization of Electronic Billing

Dear Ms. McQuade:

As large national, multi-site energy consumers, we urge NAESB to consider standardizing retail utility electronic billing (EB) transactions. The organizations represented below (and several others) conduct business transactions with numerous utilities from all over the U.S. to satisfy the reconciliation of billing and payments associated with our energy, transmission, and distribution consumption. Uniform standards would help reduce costs for customers and utilities by streamlining business processes.

This letter serves to support and complement the request for standards previously sent in from the JC Penney Company. The organizations below have similar concerns and needs and wholeheartedly support standards.

EB/EDI is certainly not new to our businesses. For years, retailers, grocers, restaurants, and other chains have utilized it for practically everything that we buy and sell. In most cases, vendors can not conduct business with our companies unless they utilize an EB/EDI platform.

It is encouraging to see that more utilities are offering EB/EDI to customers. Most national accounts customers or their third party billing agents participate in utility electronic billing transaction programs when feasible. And although we welcome utilities into the "fold," we have found some programs to be very inconsistent and onerous to the point that participating is not cost effective. In service territories where the utility offers EB/EDI, the lack of formatting consistency from one utility to another complicates matters. We experience a wide variety of differing formats which leads to critical data discrepancies. For instance, Utility A may have room for 6 characters and Field #1, but Utility B has only 3 characters.

While we realize that there is much work to be done concerning this issue, we are confident the effort will be worthwhile. Customers will benefit with less late fees and the reduced costs of sending, receiving, interpreting, and paying monthly utility bills. Utilities will certainly gain by way of timelier payments, reduced mailing/processing costs, and better customer service.

Please feel free to call us if you have any questions.

Thank you for your consideration.

Sincerely,



Angela S. Beehler

Wal-Mart Stores, Inc.

Director, Energy Regulation

479-204-0437