

**NAESB REQ**  
**Annual Plan External Comments Matrix**

Plan I tem: #1 Billing & Payments (Develop practices for billing customers and remitting payments to parties providing services to the customer.) - 4 <sup>th</sup> Qtr 2002, Customer Processes Subcommittee			
Comment Submitted By:	Comment #	Comment	Recommended Resolution
Rochester Gas & Electric Corp.	1a	Billing and Payment Processing and Customer Enrollment and Switching, both processes driven by EDI, should also be set aside. Implementation of EDI standards for these processes are underway in New York and they are expected to be in place in early 2003. Utilities and ESCOs/Marketers should not be required to make changes to procedures they have in place or are in the process of implementing.	Move all Customer Processes Subcommittee plan items out one quarter to accommodate extra time for reviewing processes already in place or under way. The new completion date for Plan I tem #1 will be 1 <sup>st</sup> Qtr 2003. The Subcommittee strongly encourages interested parties like Rochester Gas & Electric and Central Main Power Company who have experience with these issues to participate in the appropriate subcommittees. This participation will allow all parties to benefit from the lessons learned in other states and regions. Although some participants in the Subcommittee have also already invested funds to meet local standards, these same participants are still interested in evaluating potentially more efficient and effective practices. Forward to assigned subcommittee as option for plan item resolution
Defense Energy Support Center	1b	Suggestion made for setting up a way to allow one entity to bill Retail Energy Providers (REPs) that have nationwide customers; i.e. a billing service provider.	
Central Maine Power Company	1c	Billing and Payment Processing and Customer Enrollment and Switching should also be set aside. Maine has implemented EDI standards for these processes. Utilities and ESCOs/CEPs/Marketers should not be required to make changes to procedures that they have in place.	See 1a.
Plan I tem: #2 Customer Enrollment & Switching (Develop practices for Distributors to process customer switch requests from Suppliers, for maintaining current customer account information regarding a customer's Supplier, and for notifying affected parties.) - 1 <sup>st</sup> Qtr 2003, Customer Processes Subcommittee			
Note: This item completion date will be moved to 2 <sup>nd</sup> Qtr 2003 in accordance with resolution 1a & 1c			

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Comment Submitted By:	Comment #	Comment	Recommended Resolution
TXU Energy	2a	Item #2 Customer Enrollment & Switching should be moved up to the 4th Quarter of 2002. This item really goes hand-in-hand with Item #1 Billing & Payments which is scheduled for completion in the 4th Quarter. Actually, if we don't have the customer switched there will be no one to send a bill to anyway.	No change - While the subcommittee agrees that this item is also very important, we also recognize that the subcommittee will have limited resources and can not complete both item #1 & item #2, simultaneously.
Defense Energy Support Center	2b	Suggestion to have 1 industry wide standard time frame for customers to switch, as it stands now some requirements dictate a few days while others require up to 3 months.	Forward to assigned subcommittee as option for plan item resolution
Plan Item: #5 Credit Worthiness ( <i>Develop practices for extending commercial credit by Distributors to Suppliers to cover financial risk.</i> ) - 2 <sup>nd</sup> Qtr 2003, Supplier-Utility Interface Subcommittee  <i>Note: This item completion date will be moved to 1<sup>st</sup> Qtr 2003 in accordance with resolution 5a &amp; 5b.</i>			
Rochester Gas & Electric Corp.	5a	ESCO Creditworthiness and Supplier Licensing should be the first items addressed in the REQ Annual Plan. New York utilities have been already been affected by several ESCO/Marketer bankruptcies since the introduction of retail access. With the marked increase in bankruptcies and a down-turned economy, adequate standards must be put in place. In reviewing Creditworthiness and Supplier Licensing standards, the REQ should consider the policies and procedures already established in several states. Additionally, the REQ should consider the level of involvement that state Commissions have in determining creditworthiness standards.	Recommend moving up priority on this item ahead of metering (item #3).

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Central Maine Power Company	5b	ESCO/Competitive Energy Providers (CEP) Creditworthiness and Supplier Licensing standards were developed and implemented by the Maine Public Utilities Commission (MPUC) prior to March 1 <sup>st</sup> , 2000- first day of retail competition in Maine. Central Maine Power Company (CMP) agrees that the REQ should review Creditworthiness policies and procedures already established in several states including Maine. CMP supports the creditworthiness and Supplier licensing standards designed and currently managed by the MPUC. CMP deals with a counterparty's creditworthiness only when negotiating a wholesale supply contract.	Recommend moving up priority on this item ahead of metering (item #3).
<p>Plan Item: #6 Customer Information (<i>Develop practices for the release, collection, exchange &amp; maintenance of customer information between Distributors and Suppliers.</i>) – 3<sup>rd</sup> Qtr 2003, Customer Processes Subcommittee</p> <p><i>Note: This item completion date will be moved to 4<sup>th</sup> Qtr 2003 in accordance with resolution 1a &amp; 1c.</i></p>			
Comment Submitted By:  Pennsylvania PUC	Comment #  6a	Comment  The Commission also suggests that item 6 (Customer Information) is one item where policy makers and state laws will interact and govern what is to be released and that the subcommittee needs to focus on how to organize the information so as to permit its routine sharing and updating.	Recommended Resolution  Forward to assigned subcommittee as option for plan item resolution

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Plan Item: #7 Supplier Licensing (*Develop practices for licensing Suppliers with state utility commissions.*) - 3<sup>rd</sup> Qtr 2003, Supplier-Utility Interface Subcommittee

Note: This item completion date will be moved to 2<sup>nd</sup> Qtr 2003 in accordance with resolution 7a.

Comment Submitted By:	Comment #	Comment	Recommended Resolution
Pennsylvania PUC	7a	The Commission suggests that item 7 (Supplier Licensing) be separated into two items. Practices for licensing Suppliers with State Commissions should stand-alone and could be delayed to the 2003 4 <sup>th</sup> quarter. Practices for registering Suppliers with distributors should be combined with item 5 (creditworthiness standards) and still target 2003 2 <sup>nd</sup> quarter. The first part is within the purview of state laws as to the registry of companies and may not lend itself to a model business practice. The second part is critical for the interface and establishing the relationships between the two parties. Creditworthiness is only one aspect of the relationship that should also include testing of systems for information transfer capability and emergency coordination.	Recommend revision of wording - eliminated "and for registering suppliers and distributors." Also recommend moving up priority on this item ahead of metering (item #3) to 2 <sup>nd</sup> Qtr 2003.

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## NAESB REQ Annual Plan External Comments Matrix

Plan Item: #11 Electronic Delivery Mechanism - 4<sup>th</sup> Qtr 2002, Technical Electronic Implementation Subcommittee

The Subcommittee feels that there is still significant confusion regarding the content of this item and would like to confer with the whole quadrant for the proper interpretation. Some potential interpretations are provided below that would be used as clarification verbiage in the annual plan. Encana has supplied further information in Comment 11a.

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From David Koogler/Dominion Virginia Power: "Develop minimum and suggested technical characteristics and guidelines for use by market participants to exchange data, including but not limited to: transactional data interchange, websites, and bulletin boards."

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From Theresa Hess/Reliant Energy Retail Services: "Review the NAESB Wholesale Gas Quadrant's (formerly known as GISB) 'Electronic Delivery Mechanism Related Standards Manual' to determine whether the standards within should be adopted for use by the Retail Electric Quadrant."

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Comment Submitted By:	Comment #	Comment	Recommended Resolution
Encana	11a	<p>EnCana believes that the category under Electronic Delivery Mechanism (REQ Annual Plan item number 11 under <b>Data Exchange Protocols</b>) includes the following:</p> <p>Development of a standard "Look and Feel" for delivery service provider's Internet Bulletin Board posting of information related to delivery services for customers and suppliers in competitive retail markets. For example, revise the latest version of the NAESB EDM manual to incorporate electric and gas utilities as delivery service providers in addition to the existing interstate natural gas pipelines. See specifically: the latest version of the EDM Manual Tab 7, "Technical Implementation - Informational Postings Web Site (IP/EDM)" and "APPENDIX D - Minimum and Suggested Technical Characteristics and Guidelines for the Developer and User of the Informational Postings Web Site."</p>	Forward to assigned subcommittee as option for plan item resolution

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EEI	11b	<p>Item # 11 needs a little more explanation. Is this about data formats and communications protocols for sharing metered consumption data with suppliers? (With customers?)</p> <p>I think it is unrealistic to expect that data exchange standards for Uniform Business Practices can be completed by the end of the quarter following the quarter in which the Executive Committee adopts the applicable model business practices. To the extent the model practices are changed from what's in the UBP final report, additional time may be needed.</p>	Clarify wording.	Deleted: , not change to intent
Rochester Gas & Electric Corp.	11c	<p>EDI has already been addressed by several states and is underway in many more. Standardizing interchange can be a very expensive and time-consuming endeavor for both utilities and ESCOs, especially in states where they have already been directed to implement specific standards set forth by their Commissions. The New York utilities are in the process of implementing EDI based on a schedule established by the NYS PSC. While EDI is an important process, work should be deferred indefinitely while individual states' implementation efforts are underway. New and changing EDI requirements could hinder retail access; while utilities are required to be EDI compliant, ESCO/Marketers could opt not to participate if it requires extensive and costly changes.</p>	<p>The Subcommittee strongly encourages interested parties like Rochester Gas &amp; Electric and Central Main Power Company who have experience with these issues to participate in the appropriate subcommittees. This participation will allow all parties to benefit from the lessons learned in other states and regions. Although some participants in the Subcommittee have also already invested funds to meet local standards, these same participants are still interested in evaluating potentially more efficient and effective practices.</p>	Deleted: No change.

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Pennsylvania PUC	11d	<p>It is also critical that the Technical Electronic Implementation subcommittee build off of the work that has been done by the wholesale gas quadrant on electronic transfer standards and security. The Pennsylvania Commission has adopted the "GISB internet standard" for inclusion in its supplier/distributor interaction protocols. We also offer the First Regional Electronic Data Interchange (FREDI) standards for their consideration and reference. Many of items 11 through 16, which are designated for the Technical Electronic Implementation subcommittee, have been addressed by Pennsylvania's Electric Data Exchange Working Group (EDEWG) and are available at the Commission's Website  <a href="http://puc.paonline.com/electric/EDI/edewg_download.asp">puc.paonline.com/electric/EDI/edewg_download.asp</a>.</p>	<p>Wait for clarification from REQ call  (If appropriate after clarification, forward to assigned subcommittee as option for plan item resolution)</p>
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Central Maine Power Company	11e	<p>EDI /EBT should be set aside - Standardizing interchange is very expensive and time consuming. The Maine Electronic Business Transaction working group is a partnership among T&amp;D's , Competitive Electricity Providers, the MPUC and other interested parties, established for the purpose of developing detailed business processes and defining Electronic transactions to support retail choice. EDI is working well between Maine utilities and active CEP's. The Maine EBT transactions have been designed to meet the needs of Maine , considering regional standards and UIG 4010 standards. Maine is ANSI x.12 compliant. Maine utilities require CEP's attend Supplier Training, require EDI test certification (ability to send and receive EDI txns) prior to a CEP enrolling an account, etc... A very high percentage of suppliers in Maine contract with experienced EDI vendors to transmit, read and reconcile the CEP's EDI /EBT data. CMP is also an active participant at UIG (Utility Industry Group). Maine Utilities try to be proactive and discuss the "what if" and "how many programming hrs" and "what does it cost" if the Utilities had to make system changes that CEP's are requesting . Also, the Maine EBT working group meets quarterly to discuss any regional issues, requests from participating CEP's, regulatory issues from the MPUC and internal business processes / EDI transactions.</p>	See 11c
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General Comments			
Comment Submitted By:	Comment #	Comment	Recommended Resolution
Encana	Ga	All categories of the REQ Annual Plan with similar categories in the RGQ Annual Plan should be combined into a single REQ/RGQ Annual Plan. Requests for standard/commercial business practice submitted under the REQ Annual Plan categories will be subject to Triage Subcommittee review. It is expected that if a request for standard/commercial business practice falls within both REQ and RGQ Annual Plan categories that the Triage Subcommittee will recommend joint REQ/RGQ development of the standard/commercial business practice.	The Subcommittee agrees that the REQ and RGQ annual plans should be closely coordinated. However, since the REQ will be up and running in time for the June EC and Board meetings and the RGQ will not be and since the REQ is much further along in the annual plan process, the subcommittee recommends we move ahead with the REQ annual plan communicating regularly with RGQ members to facilitate coordination.
MidAmerican Energy	Gb	Added Transmission Requests and Tariffs Develop requirements and practices for making transmission requests. Develop practices and protocols for scheduling, measuring imbalance bandwidths and determining charges and penalties. [Note: Such requirements and practices require coordination with the Wholesale Electric Quadrant]	Add this item as the new number 11 titled "Settlement Process" scheduled for completion 4 <sup>th</sup> Qtr 2003- see red lined annual plan Draft F.

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Pennsylvania PUC	Gc	<p>Separate supplier licensing with a state from supplier registering with a distributor. The former may be controlled by state laws and regulations, which may be barrier to standards adoption. However the latter is extremely important and sets the stage for creditworthiness, day to day relations, and systems interaction. These items are more critical to market entry without undue barriers. So for the purpose of the survey I would separate the two items. As I was responding to the gas survey I found our position had very different priorities for these two items.</p> <p>The Commission welcomes the future work of the REQ and will give due consideration to its proposals in order to enhance the Electric Choice program in Pennsylvania. Correspondence regarding these comments can be directed to Robert A. Rosenthal, Director – Bureau of Fixed Utility Services, 717-783-5242 or email at <a href="mailto:rrosenthal@state.pa.us">rrosenthal@state.pa.us</a>.</p>	See recommendations for other PA PUC comments
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**Deleted:** It is also critical that the Technical Electronic Implementation subcommittee build off of the work that has been done by the wholesale gas quadrant on electronic transfer standards and security. The Pennsylvania Commission has adopted the "GISB internet standard" for inclusion in its supplier/distributor interaction protocols. We also offer the First Regional Electronic Data Interchange (FREDI) standards for their consideration and reference. Many of items 11 through 16, which are designated for the Technical Electronic Implementation subcommittee, have been addressed by Pennsylvania's Electric Data Exchange Working Group (EDEWG) and are available at the Commission's Website [puc.paonline.com/electric/EDI/edewg\\_download.asp](http://puc.paonline.com/electric/EDI/edewg_download.asp).