

Subj: **FW: NAESB Retail Electric Quadrant Draft Annual Plan for Comment**
Date: 6/5/02 8:36:56 AM Central Daylight Time
From: jmminneman@pplweb.com
To: gisb1@aol.com
Sent from the Internet ([Details](#))

Attached is a set of comments on the Annual Plan that were missing from the original compilation of comments sent out previously.

Jim

Dear Sir or Madam:

I would like to submit the following comments regarding the above-referenced subject Annual Plan.

The priority of Retail Access Uniform Business Practices illustrated in your e-mail of 5-13-02 appears confusing. I have listened to a recent conference call and it appears there may be some misunderstanding of the retail business. For example, Billing & Payments is listed #1 because, according to some participants on the conference call, this item should be quick and easy to resolve. In the experience of Dominion Retail who has participated in several work groups in states adopting retail standards, it is highly unlikely this item will be resolved very quickly. Some work groups spend several months debating the issues and still don't reach a consensus opinion. Likewise for item #2 (Customer Enrollment & Switching).

Instead, I would like to offer the following priority list in order of my perception of ease, working on up to the most difficult issues. The lower- ranked items (higher number) are not listed for their lesser importance (because they are in fact probably the most difficult and time-consuming to resolve), but just because they may take longer to discuss, if indeed the group wants to save the toughest issues for last. Indeed, the risk of first addressing Billing & Payments and secondly, Customer Enrollment & Switching, is that the group could well get bogged down in these issues and fall way behind the scheduled work plan.

However, it should also be recognized that the issues listed as #8, #9, and #10 are, in Dominion Retail's opinion, very significant issues for a marketer and will probably be controversial. We seriously hope that these particular issues are given the time and attention they deserve since they have been, in our opinion, some of the most serious barriers to retail market development in various states. Resolution of problems involved with these issues would greatly advance the cause of deregulated retail markets, both electric and gas. If issues were to be listed according to the importance to a marketer like Dominion Retail, they would be listed as the top priority to have the most positive impact on the retail markets.

- 1) Supplier Licensing (should not be too controversial)
- 2) Utility-Supplier Disputes
- 3) Market Participant Interactions
- 4) Customer Inquiries
- 5) Creditworthiness Standards

- 6) Retail Meter Data Validation
- 7) Load Profiling
- 8) Customer Information
- 9) Billing & Payments
- 10) Customer Enrollment & Switching

Yours truly,

Bill Barkas
Manager, Retail State Government Relations
Dominion Retail, Inc.
625 Liberty Ave.
Pittsburgh, PA 15222
tel. 412-690-1033