

UCB-POR Workshop December 3-4, 2008 – Integrys Offices, Chicago Meeting Notes

ComEd UCB/POR Tariff

- Late Dec – early January filing target date.
- Suspended system design activities/concern about cost recovery.
- Discussion of ComEd slide deck.
- Discount adjusted rate annually.
- Reconciliation not initially performed annually – initially at 3 year point.
- “Per Bill” concept.
 - Parallel to SBO per bill credit.
- POR operating costs include such things as: remittance processing, other IT costs, etc.
- ComEd plans to file the same path as Ameren with its tariff.
- Status of Design Work:
 - Focused on billing redesign initially.
 - Next, focus on architecture up to point of technical design.
 - Not currently to point of technical design on customer system.
- What does suspend mean?
 - Brakes have been put on project.
 - ComEd still supports workshop process.
- Concern about obligation to implement & provide services as a result of the suspension.

Standards/Billing Working Group (SBWG) Issues

- # 6 – Passing outstanding balance on outbound SBO for mass market:
 - Will remain open for ComEd.
 - Wanted agreement on passing 2-month bundled balance.
 - Timing could be an issue by time switch occurs.
 - Ameren is okay with proposal - screens for past due balance currently & issues manual bill.
 - Would only include utility service charges.
 - Ameren needs input since it is a design issue – will be discussed on an upcoming standards call – week of December 15th, likely Dec. 16th pm approx. 1 pm.
- #12 & #36 - Rate Reclassification Scenarios & Service Points
 - Discussion on Ameren matrices hand-outs.
 - Will show up on website – possibly in several locations, i.e. RES hand book, FAQs, stand-alone document.
- # 51 – Aggregate data on an account level 867 instead of interval data even though interval data is available.

- Summary level data provided on 867.
- # 55 & # 56 – Pending data to pending &/or active RES 814C:
 - Billing option or rate code, enforce DSAR rules.
 - Change CP node – notification.
 - RES account # - change takes effect immediately.
 - 3 exceptions – 60 day notices.
 - DS rate changes.
 - Load profile.
 - Peak load contribution.
 - 814C's will be sent (if applicable to current and pending RES).
- # 59 – Off-cycle switch with UCB/POR 100-400:
 - Proposal should be standard.
 - Still no off-cycle switching for mass market.
 - Issue will be decided on Dec 16th Standards call.
- # 61 – Budget Billing for SBO customers:
 - ComEd sends delivery service charge as a budget billing amount to billing provider.
 - Ameren believes billing provider should offer.
 - ComEd's budget billing can be adjusted downward at customers request to only reflect delivery charges.
 - Currently Ameren rejects SBO enrollment if on budget billing. Then it goes to dual billing if customer elects to drop budget billing.
 - Put a b/b flag on pre-enrollment DSAR(?)
 - Possibly handle through contract.
- # 62 – Reason codes on enrollment rejections (814E-Response).
- # 65 – Reason Codes on 814D.
- # 66 – Historical Usage Requests:
 - Ameren proposes to provide giving everything available, including interval data if known.
 - Is preference to only receive interval data when requested?
 - Yes, RES must request.
 - Will respond to the specifics requested. If interval requested on a non-interval meter you will receive only the standard data - no reject.
 - Any way to know if customer is on real time pricing (RTP)?
 - Infer if interval data exists for DS1, DS2, DS3A.
 - Website
- # 67 – Use of EDI 824 with Bill Ready
 - Send 824 to acknowledge charge (and verify good account #)
 - Send second 824 to acknowledge it got on the bill
 - To be finalized on Dec 16th Standards call
- # 68 – Billing (Service) Address on Enrollment Response
 - Ameren proposes to provide both billing (service) and mailing address on enrollment.
 - To be finalized on Dec 16th Standards call.

- # 69 – SBO 810s are being generated differently than Rate Ready and Bill Ready 810s:
 - Propose retaining current process
 - To finalize on Dec 16th standards call
- # 70 – SBO 810s – Should Ameren continue with current practice of one 810?
 - Propose retaining current process.
 - To finalize on Dec 16th standards call.
- # 71 – Transition issue – When canceling a bill that was generated prior to the SB1299 conversion date, there is no cross reference number to send to the RES since the original 867 was sent prior to conversion which did not support this functionality:
 - Cancel/Rebill over transition period – will impact a 24-month period at ComED.
 - Proposed solution – CRN field is left blank for billing periods prior to UCB/POR. FYI only - item closed.
- New Items:
 - 824 –
 - Adjustment reasons
 - In process of being developed & will be shared & discussed on Dec 16th Standards call.
 - Handling of negative remittance advice
 - Ameren will try to put thru for 5 days.
 - ComEd opinion needed.
 - Other utilities, file received but no payments.
 - Any other situations other than POR, where utilities would remit less?
 - Not currently set up for any other outside charges & will not plan to do so at this time.

Retail Electricity Requirements: ORMD Straw Man Proposal

- Marketing Practices
 - Eligibility – tabled until end
 - Residential and/or C&I
- Training of ARES/Supplier Training Agents
 - Meaning of “intimate knowledge”? Suggest it means to be familiar with the Supplier’s products & services.
 - ABC licensing requirements in progress. More limited in scope; incorporates “exclusivity”.
 - Suppliers may have telemarketers, exclusive agents of suppliers & agents of customers.
 - If agent of ARES directly
 - Add “relevant” products

- Utilities not “sales agents”
- Also add requirement to give out ICC telephone number
- **Do Not Contact List (Electric Utility)**
 - If one party/spouse adds name & other disagrees, need to resolve the way consumers want.
 - For marketing & solicitation, customer must contact utility to add name.
 - Ameren does not replace Federal “Do Not Call” list
 - ICC: in addition for retail electric web portal impact/metering data blocked
 - Customer needs to unblock
 - Doesn’t block enrollment
 - ComEd – no marketing/solicitation block list
 - But will give out data to requestor
 - Can ABC add list?
 - No
 - Customer signs up
 - Does block data if requested, different
 - Ohio – master list approach, “tying”
 - Keep at utility level preferred
 - AG: preference is Peoples model
 - Marketing/solicitation of electric supply service
 - Combo: No; separate lists preferred
 - DS rate change calls by utilities ok
 - Be clear on scope & direction
 - Customer vs Account level (ComEd is account level)
 - Summary bills may be an issue
 - List – service address, name, phone #
- **Customer Authorization**
 - 3 calendar days – issue around holidays; change to 10 business days.
 - Keep contract for 2 years after it is over.
- **In Person Marketing (Door to Door)**
 - NYI? Or Customer’s place of business – can add?
 - Should vary requirements slightly if customer initiated or not.
 - Last line – add “and give customer the electric utilities’ phone numbers.
 - Add language that ARES needs a copy too
 - What is the uniform disclosure statement intent? NY – all one with contract T&C
- **Telemarketing**
 - (i) already covered

- (ii) no comments
- (iii) Follow-up with written materials
 - Add “and agreement”
 - Enrollment – ARES sign up date of customer not utility DASR submission
 - Recording customer
 - Need to notify customer of recording
 - Agreement to be recorded
 - Third Party Verification process: add recording equipment
 - Other areas require suppliers says they are not utility
 - IL law lays out rules for utility affiliates
- **Direct Mail**
 - Initially uniform disclosure statement & LOA problematic since left behind.
 - LOA requirements attempt to meet them
 - 2nd sentence: want to be explicit & deliberate in explanation; e.g. fixed price or variable price disclosure statement needs to differ between?
 - Intent: to minimize cherry picking
 - When suppliers do a campaign its because suppliers lock up a certain wholesale product it is trying to sell to retail customers
 - Multiple offers (mailers) drive up costs
 - Akin to being able to see all products on suppliers websites
 - AG: wants to consider over some time
- **Electronic Enrollment “Marketing”(make change)**
 - Audience – only on-line only customers
 - (iii & iv) add something to remind customer to check previous contract
 - Make suppliers get extra data? Eg. Email other than account, meter numbers and name.
 - Need meter number too since it’s a requirement for enrollment.
- **Rescission of Sales Contract**
 - Rescission period discussion not an attempt to synch up with utility rescission period.
 - Business day after enrollment
 - Utility to send 1 business day; change “receiving” to “accepted”?
 - Valid and accepted DASRs initiate letter generation.
 - Ameren lets customer rescind, ComEd does not.
 - Switching letters required
 - Effective date
 - Last date to rescind
 - Dec 16th Standards Call - include Ameren switch letter & finalize; it lets customer rescind & include utility info as well as supplier info.

- **Early termination Fee**
 - AG wants discussion on fees, calculations; proposed cap for gas & will do same for electric.

- **Contract expiration and renewal offers**
 - (i) 15 day window, Need longer term
 - “benefit customer” – New contract; how to gauge this; customer must think it is a benefit
 - Take out “provided ...” clause.
 - (ii) (3) – US Energy/Integritys – Applies to existing contract? No exit fees in last 45 days; odd to use 45 days & date notice sent
 - 60 vs 45 days cause timing issues
 - (ii) (5) Other states contracts auto renew
 - AG would like to see some customer affirmative action for renewal or it only be month-to-month after initial term
 - (ii) (6) doesn’t mesh 100% with item 5 language.
 - If customer acts, existing ARES to drop defaults to utility supply if get drop DASR.
 - If dropped, customer needs to have enrollment DASR in to get ARES supplied service with no breaks.
 - Need to consider blackout window.
 - (iii) Renewal – intent is to be month to month after initial term; not intended to tell customer every month.

- **Assigning customers to different supplier**
 - New receiving ARES must also be registered too
 - Two processes
 - Drop and re-enrolls
 - RES A could be RES of record but sell book of business to RES B

- **Uniform Disclosure Requirements**
 - Utility still DS company
 - One list (section) of uniform disclosure items no matter what type of marketing.
 - Sample list; not complete.
 - AG: clarity on the product itself is needed, consistency.
 - Price
 - Definitions – index, fixed, etc
 - In some T&C now; in disclosure maybe redundant; try to keep disclosures simple. (“Consumer Box”)
 - AG: some thinking they may be similar to disclaimer language; will go back and rethink issue of disclosure vs T&C.

- **Dispute Resolution/Application of Payments**
 - Required Supplier information
 - “Where applicable” in UCB/POR utility billing in Dual Bill or SBO suppliers; intent is supplier bills.
 - 3rd sentence – if vague, rule in favor of customer; intent is to use clear language.
 - Last sentence – intent to address standard contract changes
 - Dispute Resolution
 - (iii) (1) (B) (page 8)
 - When are \$ charges removed from customer’s bill discussion last time
 - 3 way calls available.
 - If informal complaint to RES from ICC, RES lets utility know via 810 Cancel to remove charges
 - RES has 14 days to resolve whether 3 way call or not.