

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA. 17105-3265**

Public Meeting held April 13, 2000

Commissioners Present:

John M. Quain, Chairman  
Robert K. Bloom, Vice Chairman  
Nora Mead Brownell  
Aaron Wilson, Jr.  
Terrance J. Fitzpatrick

Standards for Electronic Data Transfer and  
Exchange Between Electric Distribution  
Companies and Electric Generation Suppliers

Docket Number:  
M-00960890,F.0015

**ORDER**

**BY THE COMMISSION:**

In November 1997 this Commission established the Electronic Data Exchange Working Group ("EDEWG") to develop a standard set of data transaction guidelines for the implementation of electric competition on January 1, 1999. Since that time, EDEWG has developed a consensus document, which has been renamed the Revised Plan due to the ongoing need to update and clarify data exchange processes as the competitive, retail electricity market unfolds and information technology evolves. Throughout this process the Commission has approved numerous standards and revisions prepared by EDEWG to govern the electronic exchange of data. Recent developments have produced a Revised Plan Version 2.3 and Appendix A "EGS Consolidated Billing Practices."

By Order entered March 2, 2000, the Commission released Appendix A for public comment prior to consideration of its approval or

implementation. The March 2, 2000 Order and this Order only apply to the service areas of Allegheny Power, GPU Energy, PPL Electric Utilities Corporation (PPL), and PECO Energy Company (PECO Energy) due to their settlement agreements. There is no requirement for EGS Consolidated Billing in the service areas of other EDCs. Comments were received by GPU Energy and PPL and are addressed below.

## **General Comments**

### **A. Third Party Billing**

In their comments, GPU Energy and PPL state that as members of the EDEWG that it is their understanding that Appendix A addresses only EGS consolidated billing performed by an EGS that is also the customer's generation supplier and that Appendix A does not address third party billing. PPL states that third-party billing is more complex than the practices described in Appendix A and requires additional definition. GPU Energy clarifies that a third party billing provider is an EGS that does not provide generation supply but rather provides a consolidated billing service. GPU Energy and PPL request that our final order should specifically state that third party billing is not addressed herein and that additional practice will be defined for the implementation of third party billing.

We agree with GPU Energy and PPL that Appendix A does not address third party billing and is an issue being considered on a separate track by the EDEWG. However, we find GPU Energy's definition of third party billing insufficient. In our view third party billing relates to any entity, other than the EDC or the EGS, which provides only customer billing services. A third party billing provider would nonetheless be required to hold an EGS license issued by

this Commission prior to offering its services within the Commonwealth, but it would not take title to electric energy nor would it serve as an Advanced Meter Service Provider (AMSP).

## **B. Settlement Requirements**

GPU Energy and PPL maintain that Appendix A appropriately provides different practices for EDCs as a result of specific requirements of each EDC's restructuring settlement and/or order(s), and that it is appropriate to acknowledge in the Introduction of Appendix A that such differences exist and are appropriate.

We agree in part that the Introduction of Appendix A should acknowledge that in the transition to electric competition that different practices have been outlined for EDCs due to their respective settlement agreements, but that it is the intent of the Commission that the handling of EGS Consolidated Billing will approach uniformity as the competitive market evolves. We have addressed the issue of settlement requirements numerous times at this Docket. Specifically, in our Order entered September 17, 1998, we affirm that the Revised Plan of the EDEWG contains the standards for data exchange. We remind all EDCs for whom EGS Consolidated Billing is required as a result of their settlements, to review their filings with this Commission as applicable to the practices addressed in Appendix A and to revise their tariffs and/or other documents on file as may be necessary to comply with this Order.

### **C. Change of Billing Options**

PPL comments that Appendix A does not address procedures for customer switching from EGS Consolidated Billing to Dual Billing or to EDC Consolidated Billing. PPL recommends that the customer should initiate the switch with the EGS billing agent and that the EGS (who is also the billing agent) should send the EDC an 814 Change transaction, which indicates the customer's desire. PPL also recommends that the EDC send the confirmation letter that would confirm the new billing option.

The Commission agrees in part that Appendix A does not specifically address switching procedures for billing options. However, we note that Section 3.1, relating to the initiation of EGS Consolidated Billing, appears to address switching through the use of an 814 Change. Additionally, we are unclear about PPL's recommendation as to which EGS billing agent should initiate the 814 Change transaction, i.e., the current EGS consolidated billing agent or the newly selected EGS consolidated billing agent?

We do not believe that there is a need for a confirmation letter for a customer who wishes to receive a consolidated bill from his or her existing EGS. If an EGS acts against its customer's wishes, it is not a "slam" and we have other means by which we can address this type of problem. However, if a customer chooses EGS consolidated billing in the process of switching to a new EGS, then the confirmation letter will be sent by the EDC upon receipt of an 814 Enrollment transaction. In this scenario, the confirmation letter will notify the customer of the name of EGS that has been selected by the customer to provide electric generation service and consolidated billing.

## Specific Comments

### **Section 3.2. How are disputes processed?**

GPU Energy and PPL point out that Section 3.2 of Appendix A appropriately applies to only residential customer accounts. GPU Energy comments that non-residential disputes should be addressed more flexibly, utilizing these residential procedures as guideposts. PPL comments that it is appropriate to add a practice to Appendix A that addresses the handling of non-residential disputes.

Both companies raise the same issue relating to the need to address non-residential disputes in Appendix A. Therefore, in Section 3.2 we add language similar to that found at 52 Pa. Code §57.12, which would require that the billing entity must address non-residential billing disputes by making a full and prompt investigation and by preserving an adequate record of the complaint.

In addition, PPL comments that throughout Appendix A that the term “metering agent,” as introduced in Section 3.2 of Appendix A, be limited to only those EDCs or EGSs supplying generation service since the Competitive Metering Working Group (a subgroup of the EDEWG) is addressing competitive metering. PPL explains that the existence of third-party metering services provider will significantly complicate the procedures for cancel /rebills as described in Section 3.6 of Appendix A. We agree and direct EDEWG to revise Appendix A to clarify the use of the term metering agent.

### **Section 3.4 How are PUC Informal Complaints processed?**

PPL comments that Section 3.4 of Appendix A does not appear to address the processing of non-residential informal complaints and believes that it is appropriate to add practices to address this issue.

We agree with PPL and revise Section 3.4 to indicate it applies to both residential and non-residential since 66 Pa. C.S.A., §308(d) relating to the functions of the Bureau of Consumer Services (BCS) directs the BCS to investigate and reply to all informal complaints. The BCS has standard practices for handling the different classes of informal complainants with the essential difference being that Chapter 56 applies to only residential accounts.

### **Section 3.6 How are Cancel and Re-bills handled?**

PPL comments that Section 3.6 states that reference to the meter agent in handling a cancel/rebill should be clarified to include language that acknowledges that cancel/rebills can also be handled jointly by the EDC and the EGS. PPL offers the following specific language:

“The meter agent triggers the cancel/rebill; however, the need for a cancel/rebill may be determined by the metering agent (as a result of identifying a meter error) or may be determined jointly by the EDC and EGS as the best alternative to correct a billing problem.”

We agree that the language recommended by PPL is appropriate and that it should be incorporated into the changes to be made to the Revised Plan by the EDEWG, in accordance with this Order.

**Section 3.8 Will the next scheduled meter reading be printed on the bill?**

PPL concurs with the process described in Section 3.8 of Appendix A, but notes that because its bill account numbers do not include a meter cycle code the Company will have to use an 814 Change to inform the billing agent/EGS of a change in the billing cycle. PPL states that although it currently does not have the capability to process an 814 transaction for bill cycle changes that it will work to develop that capability.

We are pleased that PPL intends to work toward implementing the practice as described in its comments to Section 3.8. However, since the development of this capability will take some period of time, PPL is directed to ascertain an implementation date for this process and to address this matter in the material it submits to Commission staff, who are coordinating the development of a Non-Compliance List with the EDEWG.

**Section 3.15 How will Transition Charges be sent to the Billing Agent?**

PPL notes that Section 3.15 of Appendix A recognizes that PECO's transition charges include both an Intangible Transition Charge ("ITC") and Competitive Transition Charge ("CTC"). PPL comments that this Section should acknowledge that PPL's transition charges also consist of an ITC and a CTC. PPL comments further that for some of its rate schedules, PPL bills the combination of ITC and CTC under the heading "Transition Charges" and, in these cases, provides a lengthy text message on the bill to identify what portion of the "Transition Charges" are associated with the ITC. For other rate schedules, PPL bills the ITC

and CTC as separate components of its unbundled bill. PPL recommends that any EGS acting as billing agent must be able to accommodate these requirements.

PPL's comments appear to relate to billing format requirements of the billing agent, which are addressed in our regulations at 52 Pa. Code §§ 54 and 56 and in the electronic data transactions developed thus far to accommodate the billing scenarios as defined in the Revised Plan. Therefore, we clarify that any EGS offering consolidated billing services must accommodate the statutory requirements and comply with this Commission's orders and regulations relating to the EDC portion of the bill.

### **Section 3.19 What is the number of Charge lines on a bill?**

PPL comments that its bill format should be maintained by the EGS consolidated billing entity because this is the format that its customers and customer service representatives are used to. PPL maintains a strong belief that its format promotes shorter and more effective bill inquiry discussions with customers. PPL notes in its comments at this Section that the detail related to PPL's ITC (as noted in its comments on Section 3.15) was reviewed and accepted by the Commission to satisfy bondholder disclosure requirements. PPL further denotes that significant programming changes would be required to modify its billing system to produce any other bill format and that, in the event of a make-up bill, the number of charge lines would increase based on the number of bill periods missed.

Section 3.19 states that the billing agent will be responsible for providing a reasonable amount of lines on the bill. This Commission believes that the term "reasonable" shall also encompass compliance with all statutory,



regulatory, and policy requirements relating to the EDC portion of the bill, as previously stated in Section 3.15.

#### **Section 4 Appendix A--Issues Referred Outside of Working Group**

PPL comments that the three issues listed in this section as “still requiring resolution” have in fact been resolved. We disagree with PPL that Section 4 relates to issues that remain “unresolved,” but that these are issues that have only been referred to others for resolution. However, we find the use of the term “Appendix A” in the Section 4 heading to be confusing since the entire document is labeled the same. Therefore, we direct the EDEWG to delete this reference in the Section 4 heading.

Following are additional comments to specific subsections, which were provided by PPL and GPU and addressed by this Commission.

##### **4.1 Payment Arrangements—Referred to PIC**

PPL maintains that its Supplier Coordination Tariff (SCT) addresses the collection of customer account arrearages and that no open issues remain regarding this matter. PPL also notes that its SCT goes further by stating “if the EGS is required to make payment to PP&L for electricity delivered to the customer for which the customer has not made timely payment to the EGS, then the EGS shall be subrogated and succeed to PP&L’s rights of recovery with respect to the electricity delivered to the customer from whom payment has not been received by the EGS.”

We believe that PPL's reference to the above provision within its SCT does not completely address the issue at hand. Nevertheless, we agree that no issues need to be resolved for this situation. The issue that was taken to PIC relates to an EGS who is providing consolidated billing to a customer who switches to a new EGS or goes back to the PLR while being in arrears. The consensus view among the PIC members was that collection issues need not be addressed for this situation since the EGS would have been making the EDC whole throughout that time, and therefore, there would be no arrearages owing to the EDC. Since it appears that no issues need to be resolved for this situation, the EDEWG should revise Section 4.1 to clarify the issue and resolution in accordance with this Order.

#### **Section 4.2 Will There Be a Billing Window for EDC Charges?**

PPL comments that Attachment E to the Advanced Meter Services Provider Qualifications Document of PPL's Supplier Coordination Tariff spells out data transfer schedules for two cases—where the EDC is the meter agent and where the EGS is the meter agent. PPL states that Attachment E references a three-day period that was developed by the Competitive Metering Working Group for consolidated billing by EGSs. PPL believes that Appendix A should not address third-party metering until such time as the Competitive Metering Working Group has completed its work on third-party metering requirements and the results have been approved by the Commission.

Section 4.2 of Appendix A states that the Metering Agent will populate the document due date (DTM02 and DTM03) on the 867 Usage EDI transaction within three full business days. Since the process for developing a “billing window” for an EDC that is currently the metering agent, we do not see a

conflict surrounding this practice or PPL's Supplier Coordination Tariff. Nor do we see a conflict with deferring the resolution of this issue to the Competitive Metering Working Group. Regardless of the status of the practices being developed by the Competitive Metering Working Group, we believe that consideration of various metering scenarios is important for determining a resolution as to how to define the billing window for an EDC. In this regard, we find the metering group to have been a valuable resource to the EGS Consolidated Working Group. Furthermore, we do not believe that this resolution as it relates to third party billing is relevant since Appendix A does not address third party billing, as we previously state in this Order.

#### **Section 4.3 What is the Payment Posting Priority?**

In Section 4.3, it is noted that the issue of payment posting priority for EGS Consolidated Billing was deferred to the Commission. GPU Energy asserts that the Commission has already adopted procedures to address payment posting for EGS Consolidated Billing and that this issue has been resolved. PPL comments that it is not clear about what issue needs to be resolved at this point since PPL is made whole monetarily by the EGS when the EGS is performing consolidated billing.

We agree with PPL about the lack of clarity relating to the specifics of this issue. Yet, we disagree with PPL and GPU that this Commission has already adopted procedures to address payment-posting priorities for EGS Consolidated Billing. However, this Commission has formally addressed payment-posting processes for EDC Consolidated Billing. See Guidelines for Maintaining Customer Services at Docket M-00960890, F.0011 (Order adopted on July 10, 1997); Guidelines for Maintaining Customer Services at Docket No. M-

00991249, F.0003 (Order adopted on August 26, 1999); Electric Retail Choice Issues Referred to the Commission by the Pilot Implementation Committee and the Electronic Data Exchange Working Group at Docket No. M-00991230, F.0002; and Petition of PECO Energy Company for a Declaratory Order Regarding Computer Systems and Business Processes Required to Implement Gas Customer Choice at Docket No. P-00991769 (Order adopted on January 27, 2000).

When the issue relating to payment posting priorities for EGS Billing was referred to this Commission, we originally brought the matter to the attention of the PIC. The PIC discussed this issue during its meetings in November 1999, and the PIC concluded that this was not an issue due to the “make whole” provisions. Since the EGS would be making the EDC whole for its undisputed basic charges, the PIC determined that there would be no need for priorities to be established. Although no formal pronouncements have been made by the Commission to address payment posting in this situation, no issue is pending due to the general consensus that priorities are not needed for the EGS Consolidated Billing scenario. To clarify the status of this issue it would be useful for the EDEWG to revise the heading at Section 4.3 to indicate “Payment Posting Priority—Referred to PUC,” and to indicate that no resolution of this issue is necessary at this time.

### **Other Related Matters**

#### **A. How long does a customer have to return to consolidated billing after retiring an arrearage?**

In EDEWG discussions relating to Appendix A, the question came up about what time period must the customer wait before being allowed to return

to consolidated billing after the customer has retired an arrearage. This issue was deferred to the PIC, which agreed upon an outcome that has not yet been formally acknowledged by this Commission. We, therefore, approve PIC's resolution that customers who revert to a two-bill scenario for non-payment, would be required to pay their arrearages in full and establish a good payment record for a three-month period before returning to consolidated billing. In view of this decision, we direct EDEWG to incorporate this question and resolution into Appendix A.

### **B. Revised Plan Version 2.3**

As noted above, the EDEWG prepared different versions of the Revised Plan and updated the concomitant Electronic Data Interchange (EDI) transaction sets. We note that the date of the Revised Plan Version 2.3 that was cited in our Order entered March 2, 2000 was incorrect. The correct date of the most recent version of the Revised Plan is November 22, 1999. Additionally, the Revised Plan Version 2.3 (November 22, 1999) had not formally been approved by this Commission for implementation. We have reviewed the Revised Plan Version 2.3 (November 22, 1999) for compliance with our previous orders and find that it appropriately conforms to our past directives.

### **C. Section 7 Appendix C—Testing**

This Section of the EGS Consolidated Billing Practices document appears to be duplicative of Section 5 relating to testing. EDEWG should delete Section 7 Appendix C when it incorporates the EGS Consolidated Billing Practices into the Revised Plan; **THEREFORE,**

**IT IS ORDERED:**

1. That Appendix A "EGS Consolidated Billing Practices" (December 2, 1999) that was prepared by the EGS Consolidated Billing Working Group (a subgroup of the Electronic Data Exchange Working Group) and reviewed and submitted to this Commission for approval by the EDEWG, is hereby approved for implementation as modified and clarified by this Order.

2. That revisions, clarifications, and additions directed by this Order shall be incorporated into the Revised Plan Version 2.3 (November 11, 1999).

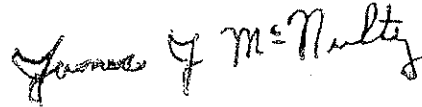
3. That the 810 ESP transaction that was developed to implement the EGS Consolidated Billing Practices is hereby approved.

4. That while we approve the 810 ESP transaction, other electronic transactions may be affected by the definitions, revisions, and clarifications Ordered herein. Therefore, we direct the EDEWG to review the EGS Consolidated Billing Practices as modified and clarified by this Order to determine the level of transaction changes that may be necessary to implement this Order and to report to this Commission within 30 days of the entered date of this Order.

5. That the Revised Plan "Electronic Data Exchange Standards for Electric Deregulation in the Commonwealth of Pennsylvania" Version 2.3 (November 22, 1999) is hereby approved, as modified and clarified by this Order.

6. That a copy of this Order and any accompanying statements of the Commissioners be served upon all jurisdictional electric distribution companies, all licensed electric generation suppliers, the Office of Consumer Advocate, the Office of Small Business Advocate, and the Office of Trial Staff. Additionally, it shall be posted on the Commission's website and shall be made available to all other interested parties.

BY THE COMMISSION,



James J. McNulty  
Secretary

(SEAL)

ORDER ADOPTED: April 13, 2000

ORDER ENTERED: APR 14 2000