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To: ACC.UTIL(rpasula)
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Subject: Retail Electric Competition Advisory Group Comments

Based on experience operating in California and the problems encountered there, I have enclosed some items for consideration.

* Many ESP's prefer to contract with third-parties for retrieval and delivery of meter data necessary for billing customers. This consolidation with one provider gives them better control and consistency across multiple LDC/UDC services areas.

* Metering standards which determine communication protocol and meter sophistication also impact MDMA functionality. If the meter communication or export file format is proprietary and requires a unique software, that will add cost and require additional development and integration time on the part of any MDMA in order to become compatible with that meter. Of course this problem also impacts the UDC as well since they might also be required at some point to interrogate that special meter. This is the Enron meter example.

* Meter data exchange between MDMA and UDC is critical. File format agreement and download responsibility needs to be worked out, and may require costs to become compatible with the UDC requirements. Any standardization of file formats reduces development costs and makes data management more interchangeable with recipients.

FirstPoint welcomes the opportunity to explore mechanisms which would make the Arizona competitive metering and meter data management services more valuable to market participants and provide more capabilities for consumers. In fact, I will be in Phoenix May 4-6 for meetings with an association and client, and maybe this would be an opportunity to open up a dialog face-to-face ??

Sincerely,
David Zerba
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FirstPoint