Citizens Position on Issue 83 – MRSP Performance Standards

1. Upon installation of the initial meter in the UDC's distribution service territory, each MRSP will prove its ability to read its meters and post validated data in Arizona's required electronic format to the MESP server. If the MRSP is unsuccessful in meeting these requirements, no additional meters will be exchanged until the MRSP successfully demonstrates its operational ability.

2. The MRSP must have one-hundred percent (100%) of the reads or interval data (actual or estimated) to the UDC by 3:00pm on the third working day after the scheduled Billing Cycle. If the MRSP fails to comply for three (3) consecutive months [R14.2.210.A.4.] or more than five (5) times in a 12-month period, the UDC will notify the ESP by e-mail of performance issues.

3. Each month if more than five percent (5%) [CUBR, Section IX, A.4.] of the of the files that the MRSP reads is marked estimated, the UDC will notify the UDC by e-mail of performance issues.

4. All files sent to the UDC shall not have any missing data or incorrect data. A tolerance allowance for SET errors and rejections of five percent (5%) will be allowed [CUBR, Section IX, A.4]. A 60-day grace period commencing on the first day data is exchanged between the parties, excluding test data, will be allowed [CUBR, Section IX, A.3]. If the MRSP fails to comply by sending files with missing or incorrect data requiring the UDC to troubleshoot the file, after the initial grace period, the UDC will notify the ESP by e-mail of performance issues. After the grace period, the UDC will apply the approved A.C.C. settlement fee to all files the UDC has to troubleshoot, billing the ESP.

5. All estimated data sent to the UDC will be reviewed and validated to verify that the MRSP followed the Arizona VEE rules. If the UDC concludes that the estimated data did not follow the Arizona VEE rules, the UDC will e-mail the MRSP requesting that the MRSP re-estimates the intervals. The MRSP will have three (3) working days to repost the estimated data. If the second file does not comply with the Arizona VEE rules, the UDC will re-estimate the intervals and send an EDI file to the ESP and MRSP. The UDC will also e-mail the ESP and MRSP explaining the reasoning for re-estimating the intervals and the amount of the settlement fee (A.C.C. approved) that the ESP will be billed for re-estimating the intervals.

6. All actual data/reads re-sent to replace any estimated data/reads can be reposted to the UDC within twelve (12) months [R.14.210.E.3] after the scheduled Billing Cycle. The UDC will decide whether to rebill the UDC portion of the bill to the customer or the ESP dependent upon the ACC Rules and the UDC Service Acquisition Agreement. The ESP will align with the UDC decision on billing the customer to ensure the customer is being billed for the same amount of kWh.

7. Upon a demonstrated pattern of non-compliance and failure to correct problems in a timely manner, the UDC may give written notice to the non-compliant ESP, the responsible MRSP, and to the Commission. After five (5) working days, Citizens may suspend processing DASRs to transfer Direct Access customers to the non-compliant ESP until the root cause(s) of the pattern of non-compliance is corrected to the UDC's satisfaction.