

TEP POSITION ON ISSUE 83 MRSP PERFORMANCE STANDARDS
Revision 11/14/00

1. The MRSP must have 100% of the reads or interval data (Actual or Estimated) to the UDC by 3:00 P.M. on the 3rd working day after the read day. If the MRSP fails to comply for three consecutive months or more than 5 times in a year the UDC will notify the ESP by e-mail of performance issues.
2. Each month if more than 10% of the total meters that the MRSP reads is marked estimated and this occurs 3 consecutive months or 5 times in a year the UDC will notify the ESP by e-mail of performance issues.
3. All actual data/reads re-sent to replace any estimated data/reads can be reposted to the UDC at any time after the billing Cycle. The UDC will decide weather to rebill the UDC portion of the bill, and the ESP will go with the UDC decision on billing the customer so that the customer is being billed for the same amount of kWh. All disputed bills will be handled by the ESP's billing agent.
4. All files sent to the UDC shall not have any missing data or incorrect data. If the MRSP fails to comply by sending files with missing or incorrect data in the EDI file, requiring the UDC to troubleshoot the file, for three consecutive months or more than 5 times in a year the UDC will notify the ESP by e-mail of performance issues. The UDC will give a grace period of 3 months to the MRSP after the 1st customer no matter who the ESP is, the UDC will troubleshoot all the files for free, 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 AZ VEE rules. If the UDC concludes that the estimated data did not follow the rules, The UDC will e-mail the MRSP requesting to re-estimate the intervals. The MRSP will have 5 working days to repost the estimated data. If the 2nd file still didn't follow the AZ 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 explaining the reasoning for re-estimating the intervals and the amount of the settlement fee (A.C.C. Approved) that the ESP will billed for re-estimating the intervals.

After the UDC Notifies the ESP regarding performance issues the ESP must respond in communicating the issues to the MRSP with in 5 Working days and e-mail a response back to the UDC within 7 working days of the notification of the performance issues.

If the Performance issues continue and are not corrected within 3 months of the notification from the ESP after communicating the performance issue to the MRSP, the UDC will file a formal complaint to the ACC on the non-conforming issues while participating in TEP's territory.

TEP with Mutual agreement from the ESP/MRSP will be willing to revise the performance standards as the amount of customers participating in Direct Access increases.

APS Comments to
TEP' POSITION ON ISSUE 83 MRSP PERFORMANCE STANDARDS
October 24, 2000

Notification Process/Requirements

The MRSP and the ESP will be notified (via e-mail), on a monthly basis for all agreed upon performance measurements. If the MRSP fails to comply with the agreed upon standards for three consecutive months or more than 5 times in a year, the UDC will send a warning notification to the ESP and MRSP by e-mail of performance issues. If the performance issues continue and are not corrected within 1 month of the warning notification, the UDC will file a formal complaint to the ACC on the non-conforming issues. The following standards will be monitored for performance issues:

• **Data Remittance**

The MRSP must have 100% of the reads or interval data (Actual or Estimated) to the UDC by 3:00 P.M. Arizona time on the 3rd working day after the Billing Schedule Read Date cycle. In the APS service territory the read window closes within 3 to 6 days of the scheduled read date. The monthly notification to the MRSP and the ESP will be sent the next business day after the read window closes and has 3 working days (including the day of the notification) to submit data. If the data is not received within this timeframe, APS will estimate and charge the ESP for performing the data estimation. If the MRSP fails to comply for three consecutive months or more than 5 times in a year the UDC will notify the ESP by e-mail of performance issues.

• **Estimated Data**

2. For each month the UDC will report all meters that are deemed as MRSP estimated in accordance with the 10% estimation rule. Any meters that are in violation of this rule for 3 consecutive months will receive the warning notification following the Notification Process/Requirements above. Each month if more than 10% of files that the MRSP reads is marked estimated and this occurs 3 consecutive months or 5 times in a year the UDC will notify the ESP by e-mail of performance issues.

• **Posting Corrected Data**

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3. All actual data/reads resubmitted -sent to replace any prior estimated data /reads can be reposted to the UDC at any time after the close of the billing Cycle. The UDC will decide whether to-rebilling is required and forward the

~~information to the ESP. If the MRSP posts corrected data 3 consecutive months for the same meter a monthly notification will not be sent, although a warning notification will be sent after the third consecutive month, the UDC portion of the bill, and the ESP will go with the UDC decision on billing the customer so that the customer is being billed for the same amount of kWh. All disputed bills will be handled by the ESP's billing agent.~~

- Data Errors/Rejections

~~If a meter fails to pass the validations of the UDC and the data is rejected for three consecutive months for the same meter, the MRSP and ESP will receive monthly and warning notifications as stated in the Notification Process/Requirements section.~~

~~Validations include but not limited to:~~

- ~~Missing intervals~~
- ~~Invalid Zero value intervals~~
- ~~VEE Requirements~~
- ~~EDI errors~~
- ~~Customer data errors (i.e. invalid meter #, cycle)~~
- ~~Data posted for incorrect time periods~~

~~All files sent to the UDC shall not have any missing data or incorrect data. If the MRSP fails to comply by sending files with missing or incorrect data requiring the UDC to troubleshoot the file, for three consecutive months or more than 5 times in a year the UDC will notify the ESP by e-mail of performance issues. The UDC will give a grace period of 3 months after the 1st customer to troubleshoot the files for free, 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 AZ VEE rules. If the UDC concludes that the estimated data did not follow the rules, The UDC will e-mail the MRSP requesting to re-estimate the intervals. The MRSP will have 5 working days to repost the estimated data. If the 2nd file still didn't follow the AZ 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 explaining the reasoning for re-estimating the intervals and the amount of the settlement fee (A.C.C. Approved) that the ESP will billed for re-estimating the intervals.~~

Incorporated language above

~~**After the UDC Notifies the ESP regarding performance issues the ESP must respond in communicating the issues to the MRSP with in 5 Working days and e-mail a response back to the UDC within 7 working days of the notification of the performance issues.**~~

~~If the Performance issues continue and are not corrected within 3 months of the notification from the ESP after communicating the performance issue to the MRSP, the UDC will file a formal complaint to the ACC on the non-conforming issues while participating in TEP's territory.~~

**APS PROPOSAL ON
PERFORMANCE MONITORING CRITERIA
(11/14/00)**

Estimated Data: Pertains to only MRSP estimated data

Scenario A: Monitor estimated data at the **individual meter level**

Month A – Estimated November/1st Notice for meter XYZ
Month B – Estimated December/2nd Notice for meter XYZ
Month C – Estimated January/3rd Notice for meter XYZ
Final Warning sent for meter XYZ
Action – ACC Complaint/other action?

- This monitors the MRSP's ability to correct meter issues (i.e. equipment problems, VEE problems etc) in a timely manner.

Scenario B: Track if 10% or more of **all meters** are estimated (We may want to consider lowering the estimation percentage?)

Month A – 100 meters active/11 estimated = 1st Notice
Month B – 500 meters active/55 estimated = 2nd Notice
Month C – 2000 meters active/220 estimated = 3rd Notice
Final warning sent
Action – ACC Complaint

- This helps eliminate the loop-hole of the MRSP estimating data to avoid the “missing data” penalties.
- This monitors the MRSP's ability to correct system problems (i.e. VEE issues, EDI problems etc).

Missing Data: Meters that need to be estimated by the UDC because of missing meter data.

Scenario A: Monitor missing data at the **individual meter level**

Month A – Estimated November/1st Notice for meter XYZ
Month B – Estimated December/2nd Notice for meter XYZ
Month C – Estimated January/3rd Notice for meter XYZ
Final Warning sent for meter XYZ
Action – ACC Complaint/other action?

- This monitors the MRSP's ability to correct meter issues (i.e. equipment problems, VEE problems etc) in a timely manner.

Scenario B: Monitor the number of total meters missing data for each month (We may want to consider having a percentage here instead of “1” account missing).

Month A – 100 meters active/1 missing = 1st Notice

Month B – 500 meters active/1 missing = 2nd Notice

Month C – 2000 meters active/1 missing = 3rd Notice

Final warning sent

Action – ACC Complaint

- A performance issue is likely to occur every month if the criteria is set to have 100% of the meter data for all meters required each month.

We may want to consider having a percentage here instead of “1” meter missing data.

**APS Energy Services
Performance Monitoring Criteria
PSWG VEE Working Group**

October 18, 2000

Criteria requiring performance monitoring

- 1) MRSP posting 100% of all data on 3rd day following the customer's EOC date.
 - 2) Percent of total estimated data per month.
 - 3) Percent of missing data per month.
 - 4) Number of times data re-posting is required due to incorrectly applying VEE rules.
 - 5) First posting (Day of install), insure that correct beginning interval, multipliers, account numbers, UNI etc. are being posted.
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- Identify reporting procedures, frequency, distribution, confidentiality, and format.
 - Verify that performance criteria can be tracked.
 - Establish acceptable and unacceptable percentages/number of occurrences around each of the criteria.
 - Set up a process to notify competitive providers of non-compliance.
 - Determine an acceptable time frame that the MRSP will be given to comply.
 - Define consequences for non-compliance.