Attachment 1: Reporting form for [Part (a) Process]

Part (a): Process for existing and prospective CCAs to obtain timely utility compliance with paragraph (9) of subdivision (c) of Public Utilities Code Section 366.2, which requires the utility to "cooperate fully with any community choice aggregators that investigate, pursue, or implement community choice aggregation programs."

PART 1 (to be completed by CCA)

Submitted by:

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Please identify the specific matter on which the utility is not considered to be cooperating fully (add lines or pages as needed):

  MCE Invoice Cancellation Transaction Support

Please provide a detailed description of the issue (add lines or pages as needed):

When PG&E provides usage to MCE via an EDI usage transaction, MCE rates the usage and returns the invoice to PG&E via an EDI invoice. Approx 5 business days later, after PG&E presents these charges on an invoice, they return a Microsoft Excel file to MCE with their internal Sub SA ID and Bill Segment ID related to that specific invoice.

MCE commonly has a need to cancel that invoice, for reasons such as:
  1. PG&E estimated the meter and received actual usage prior to the bill being sent out
  2. The usage is found to be outside of Hi/Low tolerances (this is commonly a result with meter rollovers)
  3. The invoice was calculated using an incorrect rate or rate factors
  4. Some other billing attribute on the account has changed (Baseline territory, Medical Baseline Allowance, etc.)

In situations such as these, MCE must send and EDI transaction to PG&E referencing the Sub SA ID and Bill Segment ID for the invoice to be cancelled. If MCE has not received this information because the charges have not been presented on an invoice, then they cannot cancel the invoice, and the erroneous charges must be presented to the customer, before they can be cancelled. The only way around this would be to contact PG&E and have them manually cancel the charges, a process that is not scalable for a production CCA implementation.

The Utility Industry Group (UIG) guideline for Invoice transactions between Energy Providers

and Local Distribution Companies specifies that the CCA be allowed to send an Invoice cancellation record with a reference number to their original invoice number. The sender of the invoice establishes the invoice ID, and that invoice can immediately be cancelled by a transaction referencing this ID. This methodology is very important, because in an automated solution, PG&E can send a cancel of the usage transaction immediately, and MCE must be able to automatically cancel their charges related to this now cancelled usage. Furthermore, this allows MCE to cancel an invoice prior to PG&E billing the invoice, and also negates the need for an email based interface between the two parties.

PG&E not supporting this standard invoice cancellation process results in PG&E issuing a bill that may not contain the most up to date information on the MCE portion of the bill. When the PG&E and MCE portion of the bills contain usage information that is different, this causes customer confusion, and increased calls to the PG&E and MCE call centers. In addition, this causes the customer to see additional cancellations and rebills because many of these errors could have been corrected before being presented on an invoice.

Please describe the lack of full cooperation (add lines or pages as needed):

In conference calls with PG&E, MCE has requested the ability to cancel transactions prior to invoicing, and for the ability to cancel without the usage of the Bill Segment ID which is being provided to MCE via a manual process.

PG&E has not proposed any way to automate this process, or any schedule for being able to implement such a change.

Please list the personnel at the utility with whom the community choice aggregator is working:

Name	Title	Phone Number	e-mail
Redacted	PG&E	Energy Solutions & Service	Redacted	Redacted