

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 an 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	

PART 2 (to be completed by Utility, 5 business days after notification by Energy Division)  
Submitted by:

Name	Redacted
Title	<b>Sr. Account Manager</b>
Phone	Redacted
e-mail	

*“The utility shall be required to respond in writing by providing a specific solution to the matter raised by the prospective or existing community choice aggregator, including a date-specific timeline for accomplishing the solution, and the names of personnel responsible for providing the solution.”*

Please describe the specific solution to the matter raised by the prospective or existing Community Choice Aggregator (add lines or pages as needed):

PG&E’s Bill Ready Billing Process allows for billable charges and cancelations to be submitted within a small window. Once the bill window closes the steps begin for generating a bill for the customer in a timely manner. Today’s Bill Ready cancelations are associated with actual charges presented by the utility; therefore, canceling charges that may be sent in error or after the window closes would delay the customer’s bill. Furthermore, delaying the close of the Bill Window may also impact other Service Agreements (SAs) on the customer’s account which are not related to MCE charges (e.g., Bundled or other Direct Access charges).

Please provide the date-specific timeline that the IOU will follow in order to accomplish the solution (add lines or pages as needed):

PG&E is open to having further discussions on clarifying how it currently processes MCE’s billable charges.

Names of utility personnel responsible for providing [and implementing] the solution

Name	Title	Phone Number	e-mail
Redacted	Sr. Account Mngr.	Redacted	

PART 3 (to be completed by Commission staff, 10 days following receipt of Part 2 from the IOU)

*“The commission’s report to the Legislature shall provide a detailed summary of each matter identified and initiated by the community choice aggregator, and a detailed verification of the utility’s actions taken to address and resolve these issues, including verification of the satisfaction of the community choice aggregator. The report shall also itemize any matters that have been improperly raised by the community choice aggregator using this process.”*

Summary of each matter identified and initiated by the Community Choice Aggregator (add lines or pages as needed):

Detailed verification of the utility’s actions taken to address and resolve these issues (add lines or pages as needed):

Verification of the satisfaction of the community choice aggregator (add lines or pages as needed):

Name(s) of CPUC personnel responsible for preparing this response

Name	Title	Phone Number	e-mail

Itemize any matters that have been improperly raised by the Community Choice Aggregator using this process (add lines or pages as needed):