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Bcc:

Subject: MCE Update

Ed and Scott,

Please note this email contains confidential attachments and a customer call transcript that cannot be shared per customer privacy. Please do not forward outside CPUC.

This is to follow up on PG&E's deliverables from our January 9 meeting:

1. Update on file size issue and a timeline of events surrounding the rejection of MCE billing information due to file size, and
2. The investigation of 43 MCE customers who opted out following the December mid-cycle corrected bills.

In summary, PG&E believes per its email of Jan. 17 that the actions it is taking to improve notification and system monitoring and to increase processing capability and server size between now and June will eliminate the file size issue. PG&E and MCE met on Jan. 20 to discuss these actions and solutions to the bill cancelation issue and the bill viewing issue as well. As a result, PG&E was able to confirm jointly with MCE that the file size issue (#22) has been resolved.

Additionally, PG&E's investigation does not appear to support the assertion by MCE that the 43 customers opted out due to the mid-cycle bills.

While the 22 customers who contacted our PG&E Contact Center appear to have

done so in response to confusion around the bills, the call recordings make it clear that in almost all cases the Call Center Reps (CSRs) noted that the billing issue was not due to a MCE error and in many cases attributed it specifically to PG&E's billing system.

During the calls, quite a few customers independently indicated that they wanted to opt out of MCE service; some believed that they had already opted out or would be opted out by doing nothing.

We have included the call summaries and a transcript should you wish to review them. As mentioned above, customer privacy prevents sharing of these materials outside the CPUC.

File Size Issue Overview Summary:

- The first file rejections associated with file size occurred in October 2011 and the second occurred the following month in November around the Thanksgiving holiday.
- A timeline of events is attached.
- In October, the rejected file was caught within the billing window and all appropriate MCE charges were reflected on the bill. No corrected or mid-cycle bills were required. PG&E advised Noble that the files needed to fit within certain parameters.
- In November, Noble submitted a large file similar to the October submission right before the Thanksgiving weekend. The file rejection was not noted by PG&E until after the holiday weekend. At that point, there was not sufficient time for resubmission, file processing and inclusion of charges on the bill before the close of the billing cycle. MCE charges did not get consolidated on the bills for 2,500 MCE customers.
- PG&E manually prepared mid-cycle bills reflecting PG&E and MCE charges and sent these to the 2,500 MCE customers who were impacted by the file issue, and as a result did not have MCE charges on their bills.
- PG&E has taken or is taking three actions to ensure that files will be processed timely going forward:
 1. PG&E has implemented enhanced notification and monitoring of files such that we will actively review the processing of the files submitted by Noble, and quickly contact Noble if the files are rejected.
 2. An automatic system confirmation that files have been accepted (not rejected) is scheduled for service Feb. 15 along with interim system upgrades to ensure that files will not be rejected for size limitations.
 3. New larger server capability to support anticipated CCA growth across the system is scheduled for service in June 2012 to accommodate MCE's scale up and any other CCA activity.

Summary Investigation of 43 MCE Customers who Opted-Out in December 2011, and January 2012

- 43 MCE customers who received these mid-cycle bills opted out in December 2011 and January 2012.
- MCE is concerned customers opted out due to the billing error and or contact with PG&E CSRs.
- MCE provided PG&E with the name of one customer who referenced a call with a PG&E CSR specifically, along with other customers who opted out after the mid-cycle bill.
- PG&E has completed the investigation of the 22 customers who actually contacted the PG&E Contact Center.
- A total of 36 calls were made regarding the mid-cycle bill issue. Several of the customers made multiple calls regarding the issue and are included in the 36 call total. 10 calls did not concern MCE.
- In reviewing the call summaries, PG&E has not found that the customers who called PG&E call centers opted-out due to the billing error. PG&E has found some individual CSRs needed additional training.

Customer Call Overview and Action

- It appears that confusion about the mid-cycle bill was the reason for most of the calls. However, in speaking to the CSRs, many customers were surprised to learn they were being served by MCE. Either they thought they had opted out originally, or thought that by doing nothing, they would automatically remain on PG&E supply service. Some examples include:
 - Call #4: Customer believes they had previously opted out and wants to opt out now.
 - Calls #6-9 (Same customer): Customer believed they had previously opted out.
 - Call # 12 & 13: Retired PG&E employee thought by doing nothing he would be opted out.
- PG&E believes three calls reflect a need for additional CSR training (Call #14, Call #30, and Call #33)
 - In Call # 33, the CSR needs to review the MCE information to better understand their services
 - In Calls # 14 and #30, the CSR should to maintain a more neutral position.
- To provide more CSR training where needed, PG&E has instituted the following actions:
 1. Feedback has been given to specific CSRs.
 2. PG&E is preparing broader communication to ensure CSRs understand their responsibilities with respect to CCA customers.

3. PG&E has begun reevaluating its Call Guide in Gen Ref to ensure guidance is clear.

- The 36 call summaries pertaining to MCE the mid-cycle bill investigation are attached.
- Also attached is a short summary of PG&E's CSR training and practices supporting MCE call escalation.

Investigation of the specific MCE small commercial customer who was the subject of MCE's December 12 e-mail

- PG&E investigated an individual customer who referenced their contact with PG&E call center in opting-out of MCE service.
- PG&E's investigation does not indicate improper action by the responding CSR who was part of the MCE specialized support team. At the time of the call, the CSR did not know why the mid-cycle bill went out, and said so.
- The live call transcript (Harrison Holdings) is attached.

Next Steps on MCE Issues List

Finally, PG&E is reaching out to MCE to meet to discuss our investigation and actions we are taking to ensure PG&E's CSRs are properly trained, calls are properly escalated, and appropriate responses are given to customers.

We continue to work through the Issues List with MCE and believe we are making good progress both in our discussions and our internal process of finding and implementing solutions to these issues. We are coordinating with Dawn to find a day next week when PG&E and MCE can formally share our specific plans for addressing the remaining issues. We would propose to share our proposed solutions with MCE, gain their concurrence, and then report out to the CPUC collectively on the remaining issues.

Please do not hesitate to call me if you have additional questions or concerns on these matters.

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Best regards,

Jennifer Dowdell
Director Regulatory Relations
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