NOTICE DATE:  May 29, 2018

NOTICE TYPE:  R-A052918-01 Legal

SHORT DESCRIPTION:  Mass Transition Initial Conference Call

INTENDED AUDIENCE:  TDSPs, PUCT Staff, Defaulting CR, and POLRs

DAY AFFECTED:  May 30, 2018

LONG DESCRIPTION:  On Tuesday, May 29, 2018, an ERCOT Market Participant/Competitive Retailer (Defaulting CR) defaulted with respect to its Standard Form Market Participant Agreement (SFA) with ERCOT. Therefore, in accordance with ERCOT Protocol Section 16.11.6.1.6(3)(b), ERCOT will be initiating the Mass Transition of the Defaulting CR’s Electronic Service Identifiers (ESI IDs) pursuant to ERCOT Protocol Section 15.1.3.

ERCOT has arranged a conference call for Wednesday, May 30, 2018 at 10:00 AM for affected Transmission Distribution Service Providers (TDSPs), designated Providers of Last Resort (POLRs), the defaulting Competitive Retailer (CR), and the PUCT staff to discuss a mass transition.

ERCOT has confirmed a Mass Transition will occur because of a default in the ERCOT market and all ESI IDs associated with the defaulting CR will be gained by one or more designated POLRS.

The call will cover the following topics:

1. Issue background
2. Logistics of Mass Transition
3. The date ESI ID switches will take place (i.e. “Requested Date”)
4. Information needed by/from each party involved

ACTION REQUIRED:  It is imperative that representatives from the above-referenced audience participate in the conference call.  The call participants should include people knowledgeable about ERCOT retail transactions as well as representatives to discuss any business/policy issues.

ADDITIONAL INFORMATION:  Call details:

|  |  |
| --- | --- |
| ***Breeze LLC Mass Transition***  ***Drop to POLR***  ***Timeline for Mass Transition Events*** | 1. **Tuesday, 5/29/18 at Approximately 4:15 PM**:    1. ERCOT Notice the POLR CRs, TDSPs and PUCT Staff of Mass Transition event. 2. **Wednesday, 05/30/18 at approximately 7:40AM**\_    1. ERCOT had already triggered Breeze LLC DUNs 0785825301000 Drop to POLR transactions with Requested Date of Friday 6/1/18 for TDSPs Meter Reads. 3. **Wednesday, 05/30/18 at 10:00 AM**:    1. Initial Mass Transition Call included all TDSPs, all POLR CRs, PUCT Staff and ERCOT.    2. Announcement by ERCOT that Breeze LLC DUNS 0785825301000 is the Defaulting CR.    3. Drop to POLR population is 9,185 ESI IDs (at the time of the call)    4. ERCOT requested Drop to POLR Switch Date Friday, 6/1/18.    5. ERCOT provided distribution of ESI IDs by TDSP’s Service Territory included additional break down by Premise Type as applicable:       1. Residential       2. Small Non-Residential       3. Medium Non-Residential       4. Large Non-Residential    6. Customer Billing & Contact Information (CBCI) Files were communicated via NAESB to impacted POLR CRs and TDSPs.    7. Next Mass Transition Call scheduled at 10:00 AM on Thursday, 5/31/18, with only impacted TDSPs and POLR CRs, along with PUCT Staff and ERCOT. 4. **Thursday, 05/31/18 at 10:00 AM**     1. Second Mass Transition conference call ERCOT provided status updates for:       1. ESI ID Total Population          1. Pending          2. In Review          3. Scheduled          4. Cancelled          5. Completed (Number and Percentage)       2. By TDSP’s Service Territory          1. Pending          2. In Review          3. Scheduled          4. Cancelled          5. Completed (Number and Percentage)    2. ERCOT’s update included that their vendor started contacting Customer’s via telephone, email and/or text message providing information about the Breeze Default and they should start looking for a new REP.    3. Some CRs reported they were having problems loading the CBCI file(s) received from ERCOT. There was an extra column that prevented them from loading. ERCOT stated they will investigate to determine if the file creation process the problem.    4. TDSP(s) obtained ***Midnight Register Read*** from their MDM for AMS Meters on 06/01/2018 at 00:00:00. Completing all AMS Mass Transition Drops to POLR in TDSP’s systems as of 23:59:59 initiating the POLR Drop Request.    5. TDSP(s) received additional Drop to POLR Switch Requests from ERCOT that requested a Date of Saturday, June 2, 2018. ERCOT was notified during Market Call of the incorrect date. ERCOT requested that TDSP(s) see if they could change Requested Date from 6/2/18 to 6/1/18    6. TDSP(s) received same day MVIs and Switches from Customer’s REP of Choice requesting Thursday, 05/31/18, that were accepted by the TDSP(s) since the 06/01/18 Drop was still in an “Scheduled” state in TDSP’s systems.    7. Next Mass Transition Call scheduled at 10:00 AM on Friday, 06/01/18, with only impacted TDSPs and POLR CRs, along with PUCT Staff and ERCOT.      1. **Friday, 06/01/18 at 10:00 AM**     1. Third Mass Transition conference call ERCOT provided status updates for:       1. ESI ID Total Population          1. Pending in Review          2. Scheduled          3. Cancelled          4. Completed (Number and Percentage)       2. By TDSP’s Service Territory          1. Pending          2. In Review          3. Scheduled          4. Cancelled          5. Completed (Number and Percentage)    2. ERCOT reported Total of **9,178** ESI IDs anticipated to transition from Breeze. This number does not include 500 transactions that were cancelled for various reasons    3. TDSPs field readings for non-AMS meters completed with June 1, 2018 meter reading. This would include IDR Meter premises if applicable in the population of ESI IDs and requires field read execution.    4. Non-POLR CRs stated they were not able to get their Friday, 06/01/18, MVI or Switch request honored by TDSP(s).    5. TDSP(s) notified CRs that Friday, 6/1/18, Requested Date wasn’t possible for same day Move-In or Switch Request due to Drop to POLR Switches have already completed in TDSP’s system. The 867\_03 Final and 867\_04 Initial transactions have not been processed at this point.    6. ERCOT provided the following Market Notice to the RMS Listserv to advise CRs of the unavailability of the 6/1/18 MVI or Switch Requested Date:     “ERCOT and several Market Participants have received a number of questions regarding Switch and Move In rejections in relation to the ongoing mass transition event.  To clarify:  Any **814\_01 (Switch)** or **814\_16 (Move In)** transaction…   1. Including an ESIID involved in the ongoing Mass Transition, 2. Received and processed by ERCOT today 6/1/2018, 3. Requesting an effectuating date of today 6/1/2018, 4. Showing a Drop to POLR transaction that is not **Cancelled**   …**will in all likelihood be Rejected by either ERCOT or the associated TDSP.**  **The first effectuation date available for the ESIIDs in question is therefore tomorrow, 6/2/2018.**  **Reminder:  This only relates to ESIIDs involved in the current Mass Transition effort and showing a Drop to POLR in ERCOT’s Market Information System.”**   * 1. Next Mass Transition Call scheduled at 10:00 AM on Saturday, 06/02/18, with only impacted TDSPs and POLR CRs, along with PUCT Staff and ERCOT.  1. **Saturday, 06/02/18 at 10:00 AM**     1. Fourth Mass Transition conference call ERCOT provided status updates for:       1. ESI ID Total Population          1. 0 Pending          2. 0 In Review          3. **624**  Scheduled          4. UNK Cancelled          5. **8,502 for 93.5%** Completed      * + 1. By TDSP’s Service Territory        1. Pending        2. In Review        3. Scheduled        4. Cancelled        5. Completed (Number and Percentage)   1. ERCOT currently is working with the TDSPs to manually cancel transactions that the TDSP(s) had already completed in their systems with an effective date of Friday, 6/1/18   2. ERCOT stated there are 80 ESI IDs where Breeze is Rep of Record that are in various states that they will be monitoring to determine if what actions, if any, will be necessary   3. Next Mass Transition Call scheduled at 10:00 AM on Monday, 06/04/18, with only impacted TDSPs and POLR CRs, along with PUCT Staff and ERCOT.  1. **Monday, 06/04/18 at 10:00 AM**     1. Fifth Mass Transition conference call ERCOT provided status updates for:       1. ESI ID Total Population          1. 0 Pending          2. 0 In Review          3. **549**  Scheduled          4. UNK Cancelled          5. **9,183 for 94.46%** Completed       2. By TDSP’s Service Territory          1. Pending          2. In Review          3. Scheduled          4. Cancelled          5. Completed (Number and Percentage)    2. **546** of the Scheduled transactions are in AEP’s North Service Territory. Only 10% of AEPN Service Territory Drop to POLR Switches show completed at ERCOT. Jim Lee (AEP) advised attendees of AEP’s system issues created file failure and delayed the transmission of these readings/usage data to complete transactions at ERCOT, these transactions show a reading/usage taken on Friday, 6/1/18. AEP working to expedite corrected file(s) to provide to ERCOT. PUCT Staff planned to discuss their concerns and highlight the criticality of this issue with AEP off line.    3. ERCOT working MarkeTrak issues with TDSPs to resolve various cancelled transactions for Drop to POLR transactions that had already worked complete in TDSP’s systems.    4. With the volume of uncompleted transactions ERCOT will schedule the next Mass Transition Call scheduled for 2:00 PM on Tuesday, 06/05/18, with only impacted TDSPs and POLR CRs, along with PUCT Staff and ERCOT. 2. **Tuesday, 06/05/18 at 2:00 PM**    1. Sixth Mass Transition conference call ERCOT provided status updates for:       1. ESI ID Total Population          1. 0 Pending          2. 0 In Review          3. **472**  Scheduled          4. UNK Cancelled          5. **9,249 for 95.14%** Completed       2. By TDSP’s Service Territory          1. Pending          2. In Review          3. Scheduled          4. Cancelled          5. Completed (Number and Percentage)    2. ERCOT reported **472** ESI IDs still showing Scheduled in AEPN Service Territory – 469 Drop to POLR Switches and 3 Move-Ins = **472** Total. All these transactions requested a date of Friday, June 1, 2018.    3. Jim Lee (AEP) these 472 Usage transactions expected to be at ERCOT before end of business today. All of them include readings that were obtained on June 1, 2018    4. With the volume of Scheduled/Uncompleted transactions ERCOT will schedule the next Mass Transition Call scheduled for 10:00 AM on Wednesday, 06/06/18, with only impacted TDSPs and POLR CRs, along with PUCT Staff and ERCOT 3. **Wednesday, 06/06/18 at 2:00 PM**    1. Seventh and Final Mass Transition conference call ERCOT provided status updates for:       1. ESI ID Total Population          1. **0 Pending**          2. **0 In Review**          3. **0 Scheduled**          4. **0 Cancelled**          5. **9,721 for 100%** Completed       2. By TDSP’s Service Territory          1. Pending          2. In Review          3. Scheduled          4. Cancelled          5. Completed (Number and Percentage)    2. ERCOT reported **44** ESI IDs with Date Wanted of Monday, 6/4/18 are still outstanding that are outside the transition window. ERCOT will work directly with the affected TDSPs to determine process to resolve these transactions    3. ERCOT received Complete Unexecutable (814\_28(09)) responses from 2 TDSPs Drop to POLR transactions that are NOT an acceptable response to Drop to POLR (814\_10) transactions. ERCOT will be working directly with those TDSPs to get those transactions resolved    4. Market Participants will work off line with AEP to resolve any outstanding inquires pertaining to missing transactions.    5. ERCOT’s communicated their final Mass Transition Market Notice on June 6, 2018:   NOTICE DATE:  June 6, 2018  NOTICE TYPE:  R-A052918-03 Retail  SHORT DESCRIPTION:  Final Update/Completion of Mass Transition Event  INTENDED AUDIENCE:  Breeze LLC, Allocated POLRs, Affected TDSPs, and PUCT staff  DAY AFFECTED:  June 6, 2018  LONG DESCRIPTION:  ERCOT Market Participant/Competitive Retailer (CR), Breeze LLC (DUNS Number 0785825301000), has zero (0) active Electric Service Identifiers (ESI IDs) in ERCOT’s system.  The last Breeze LLC ESI ID transaction was received by ERCOT on June 6, 2018 at 5:28 AM CPT.  This will be the last update/communication regarding the Breeze LLC Mass Transition event.  . |
| ***TDSPs’ Transactional Processes***  ***TDSPs’ Transactional Processes*** | 1. ***814\_01 Switch vs. 814\_16 Move-In Transaction***     1. **814\_01** Switch Request transaction will only change REP of Record, Customer specific information will not change    2. **814\_16** Move-In transaction will always change Customer specific information and Customer specific billing attributes reflect new Customer status for example:       1. Critical Care/Special Needs status removed,       2. Demand Ratchet resets,       3. 4CP resets for Large Commercial and Industrial (C&I) premise types.    3. **814\_16** Move-In Request for some Municipalities/Cities require new occupant permits applications to be completed and received by the TDSP prior to ESI ID(s) being energized by TDSP, therefore, delays could be experienced where this permit would be applicable. 2. ***For AMS Meters the Midnight Register Read Transitions Switch, Move-In/Move-Out Force Off and CSA Move-In Request:*** 3. With the TDSP’s AMS Meter Read obtained at 23:59:59 Thursday, 5/31/18, and the 00:00:00 ***Midnight Register Read*** obtained on Friday, 6/1/18, completes the transition of the Drop to POLR CR(s) in the TDSPs’ systems. The result, this doesn’t allow Non-POLR Switches or Move-ins to be received on and accepted for a Friday, 6/1/18, Requested Date.    * 1. **NOTE**: If that MVI or Switch request wasn’t received and accepted by the TDSP while the Drop to POLR Request was in a “Scheduled” state in the TDSP’s systemsthe Move-In or Switch would be rejected.      1. ***TDSP’s 867\_03 Final and 867\_04 Initial Transaction Processing:***     1. ***AEP, CNP and TNMP***        1. **867\_04** Meter Reads and **867\_03** Usage obtained today will be processed after midnight (tomorrow) during CIS Batch and those files will be communicated to ERCOT on that day.       2. Exception to the process noted above is Sunday(s) when Batch is delayed until Monday because of weekly Sunday system outages for scheduled planned maintenance.    2. ***Oncor***       1. **867\_04** Meter Reads are communicated to ERCOT almost immediately after the completion of the MVI / Switch / POLR Switch.       2. **867\_03** Usage obtained that day is processed in that night’s billing batch and communicated to ERCOT. |

***Lessons Learned:***

1. ***Notice of Change of Information (NCI) form***
   1. To ensure that the correct company representatives are involved into the Mass Transition event from the beginning of ERCOT market communications to the very end where the final market notice is provided by ERCOT, it is ***critical*** that ERCOT consistently provide market communications to those individuals included in the companies’ NCI form that are identified as Transition/Acquisition (TA) for Technical, Business and Regulatory, along with companies’ Authorized Representative (AR) and Backup AR. This would ensure that ERCOT consistently notify the same individuals without any deviation between Mass Transition event(s).
   2. Consider if this process would be better documented in the Retail Market Guides or create a new Other Binding Document for ERCOT and Market Participants’ responsibilities.
   3. For additional information pertaining to the ERCOT’s NCI form review the attached Protocols Section 23 Form E: [**Section 23 Form E: Notice of Change of Information**](http://ercot.com/content/wcm/current_guides/53528/23E-010118_Nodal.doc)



1. ERCOT transmitted 9,815 Drop to POLR Switch Transactions to impacted TDSPs at approximately 7:40 AM on May 30, 2018 for BREEZE LLC DUNS 0785825301000, almost 3 hours prior to the initial Mass Transition Conference Call scheduled at 10:00 AM on Wednesday, May 30, 2018 (see above). Based upon past experiences for Mass Transactions to POLR this is the first time that ERCOT transmitted these Drop transactions to the TDSPs prior to the scheduled Mass Transition Conference Call with Market `Participants. The Mass Transition notice provided on May 29, 2018 doesn’t provide Mass Transition CR Name and/or DUNS:
   1. The issues identified with ERCOT’s triggering the Drop to POLR Switch transactions prior to the Mass Transition Conference Call:
      1. Didn’t allow TDSP(s) the ability to ensure that their systems were ready to receive these Drop to POLR transactions for monitoring of potential transaction exception(s), reject(s) or system processing failures.
      2. TDSP(s) wouldn’t be able to flag the ESI IDs or verify the accuracy of ERCOT’s TDSP specific ESI ID count prior to transactions being triggered.
      3. Doesn’t allow TDSPs to block Defaulting CR from gaining new ESI IDs through the Safety Move-In Process, which would mean additional ESI IDs could be added to the transition population.
   2. To remedy the concerns listed above in (1a) and if legally possible, TDSPs should be advised of the defaulting DUNs prior to transactions flowing and/or the initial Mass Transition Call in order that TDSPs can assist ERCOT with verification of population, status and management of transactions prior and throughout completion of the Mass Transition event.
2. ERCOT requested some of their Drop to POLR Switch Requests for a Date Wanted of Saturday, June 2, 2018 instead of June 1, 2018. ERCOT requested via email that TDSP change Requested Date from 6/2/18 to 6/1/18, which created manual work for TDSP(s) to correct impacted ESI IDs to the original Drop Date of Friday, June 1, 2018 requested by ERCOT. ERCOT notified of the corrected dates via email that the TDSP(s) had made the corrections.
   1. Consider developing process for the 814\_12 that can be used by ERCOT – Drop to POLR only transactions that would permit an automated solution for ERCOT to change or correct the requested date in the Drop to POLR transaction without ERCOT or TDSP manual intervention.
3. Later ERCOT cancelled Drop to POLR transactions that were already completed by TDSP(s) creating additional manual processes via the MarkeTrak system to correct the Switch from Cancel to Complete at ERCOT.
4. During the May 31, 2018 Mass Transition Conference Call, ERCOT announced that their vendor will start contacting Breeze LLC’s impacted Customers via telephone, email and other direct correspondence, not just mailer, to advise them of what will be transpiring on Friday, June 1, 2018. This type of communications gave Customer’s an opportunity to shop for another CR must quicker than in the past where the only communications provided by ERCOT and gaining POLR was via USPS letter. With this direct telephone/cellular phone messaging and email communications along with public notices provided by news media created a flurry of request from Customer’s REP of Choice requesting Safety Net Move-Ins, Switches and proposing other manual processes via MarkeTrak requesting a Friday, June 1, 2018 date wanted to prevent Customer’s from being transitioned to POLR CR(s) and higher rates.
   1. With automated systems, AMS meters, Solution to Stacking logic the only **optimum** requested date for Same Day Switch or Same Day Move-In to transition affected ESI IDs to their REP of Choice was on Thursday, May 31, 2018, in turn would allow ERCOT to cancel the Drop to POLR Switch because the ESI ID(s) would no longer have Breeze LLC as the REP of Record.
5. ERCOT stated they couldn’t accept an 814\_28 Complete Unexecutable transaction for Drop to POLR since a DROP is originated with an 814\_10 Drop to POLR and not an 814\_01 Switch transaction.
   1. Benefits of ERCOT accepting 814\_28 Complete Unexecutable transaction outweigh the amount of time it takes to manually cancel or complete transactions via MarkeTrak.
6. Customer Billing and Contact Information (CBCI) files – is there a need to periodically test this process since there seems to be issues with the process or the file once produced? [**Section 9 Appendix F6: Customer Billing Contact Information**](http://ercot.com/content/wcm/current_guides/53527/09F6_072416.doc)
7. Impacted TDSPs and CRs, both POLR and non-POLR, should be provided a ***template*** of ERCOT’s Customer direct communications for Customers’ involved into the Mass Transition event. These communication types would include letters, email/text message(s), telephone communication(s) and/or news media releases provided by ERCOT so that TDSPs and CRs may prepare our Call Centers for Customers’ inquiries related to the Mass Transition event. Market Consideration, should this type of communication be better documented in the Retail Market Guides or create a new Other Binding Document of ERCOT’s Customer communication responsibilities for a Mass Transition event.

**§25.43. Provider of Last Resort (POLR).**

**Paragraph (p) (16) Rule Page 14**

**REP obligations in a transition of customers to POLR service.**

(16) **In a mass transition event, *the ERCOT initiated transactions shall request an out-of-cycle meter read for the associated ESI IDs for a date two calendar days after the calendar date ERCOT initiates such transactions to the TDU***. ***If an ESI ID does not have the capability to be read in a fashion other than a physical meter read, the out-of-cycle meter read may be estimated****.* An estimated meter read for the purpose of a mass transition to a POLR provider shall not be considered a break in a series of consecutive months of estimates, but shall not be considered a month in a series of consecutive estimates performed by the TDU. A TDU shall create a regulatory asset for the TDU fees associated with a mass transition of customers to a POLR provider pursuant to this subsection. Upon review of reasonableness and necessity, a reasonable level of amortization of such regulatory asset shall be included as a recoverable cost in the TDU’s rates in its next rate case or such other rate recovery proceeding as deemed necessary. The TDU shall not bill as a discretionary charge, the costs included in this regulatory asset, which shall consist of the following:

(A) fees for out-of-cycle meter reads associated with the mass transition of customers to a POLR provider; and

(B) fees for the first out-of-cycle meter read provided to a customer who transfers away from a POLR provider, when the out-of-cycle meter read is performed within 60 calendar days of the date of the mass transition and the customer is identified as a transitioned customer.



ERCOT’s presentation to RMS on June 5, 2018 recommended the following: [**14. RMS 2018 06 05 Mass Transition Timing v3**](http://ercot.com/content/wcm/key_documents_lists/139219/14._RMS_2018_06_05_Mass_Transition_Timing_v3.pptx)

* Options for revisions to timing:
  + Reduce ***two hours’ notice*** between ERCOT notification and the coordination meeting, especially on a day before a weekend or ERCOT holiday (RMGRR)
  + Reduce ***two-day window*** between current date and scheduled meter read date (RMGRR, NPRR).
* In addition:
  + Consider if the five-day limit on Mass Transition completion is necessary.

***Areas of Market Consideration for Improvements:***

1. ERCOT recommends ***two-day window*** between current date and scheduled meter read date be reduced:
   * *PUCT Rule 25.43 was and still is the directive in which TX SET referenced in developing the two days requirement that is currently identified in ERCOT Protocols Section 15.1.3.1 Mass Transition Process, therefore, a PUCT Rule change would be required.*
   * *See Page 11 of this document for actual language copied from PUCT Rule 25.43 subparagraph p (16) or preview page 14 of the attached pdf.file:*



15.1.3.1 Mass Transition Process

In a Mass Transition event, ERCOT shall submit the 814\_03, Enrollment Notification Request, requesting a meter read for the associated ESI IDs, for a date **two days** after the date ERCOT initiates such transactions to the TDSP. The 814\_03 transaction shall contain a request for historical usage and the requested date for the meter read date to transfer the ESI IDs. If an actual meter read cannot be obtained by the date requested in the 814\_03 transaction, then the meter read may be estimated by the TDSP. (See Retail Market Guide Section 9, Appendices, Appendix F2, Timeline for Initiation of a Mass Transition on a Business Day not Prior to a Weekend or ERCOT Holiday, and Appendix F3, Timeline for Initiation of a Mass Transition on a Day Before a Weekend or an ERCOT Holiday.)

***Areas of Market Consideration for Improvements:***

* + ERCOT recommends a reduction in the ***two-hours’ notice*** between ERCOT notification and the coordination meeting, especially on a day before a weekend or ERCOT holiday (RMGRR)
    - Since there isn’t any way to reduce the backend pertaining to reducing the Date Requested in the Drop Transaction, let’s look at the front end prior to ERCOT’s notification and the coordination meeting.
    - Market Consideration for Improvement:
      1. ERCOT currently allows (2) Business Days for CR to Cure prior to triggering Default
      2. After the End of First Business Day – CR still in Pre-Default Status
      3. Morning of 2nd Business Day – CR still in Pre-Default Status

**10:00 AM** –Business Day 2 (ERCOT’s Notification)

ERCOT sends preliminary bare bone notice to all TDSPs, POLR CRs, PUCT and ERCOT Staff. Default Email would state “Potential Default” Mass Transition Conference Call tentatively planned for 4:00 PM today- attendees should plan accordingly

If CR Cures – next email would be to notice all TDSPs, POLR CRs, PUCT and ERCOT Staff of false alarm.

If Mass Transition Status is confirmed as CR Default, attendee/invitees should plan for 4:00 PM Mass Transition Conference Call with transactions being triggered today.

**3:00 PM** - Business Day 2 – If Mass Transition Status is confirmed CR Default

ERCOT contacts TDSP(s) via email providing TDSPs only with Defaulting CR Name and all impacted DUNS. At this point ERCOT may be able to provide TDSP’s their ESI ID specific population

Mass Transition Conference Call information provided via email to TDSPs, POLR CRs and ERCOT Staff.

**4:00 PM** – Business Day 2 – Mass Transition Coordination Meeting.

ERCOT provides CR Default Name and DUNs, ESI ID population, Premise type etc.

ERCOT triggers 814\_10 Transaction just prior to the call with Requested Date of two days from current – per Rule 25.43.

ERCOT triggers Customer Billing & Contact Information (CBCI) Files via NAESB to impacted POLR CRs and TDSPs.

* + - These timeline changes would assist:
      1. TDSP’s with their need to know as early as possible the CRs DUNs and ESI ID population to prepare/monitor systems to prevent delays with response transactions and schedule necessary field readings, especially where many transactions may require field reads and continue to meet the two-day transition timeline.
      2. Those companies where there operations maybe outside of the Central Prevailing Time zone, for example Eastern time zones where their offices close at 5:00 PM. This earlier notification would prepare those individuals to be a on standby after hours.
      3. ERCOT with their recommendation to reduce the completion time frame, this saves one full day from the transition, also the two-hour triggering window without Rule or Protocol changes.
         * For example, this timeline change on the front end for the Breeze LLC Mass Transition would have the transactions scheduled for 05/31/18 instead of 06/01/18.

***Areas of Market Consideration for Improvements:***

1. Suggest two transactional changes that would ***only be applicable to an 814\_10 Drop to POLR transaction***, both would eliminate manual workarounds required to cancel the initiating or competing transactions experienced by both ERCOT and TDSPs.
   * **814\_28** Complete Unexecutable should be changed to allow TDSP(s) to unexecute the Drop to POLR transactions instead of a manual cancel that takes longer and must be completed by ERCOT. This is usually completed through a MarkeTrak issue
   * **814\_12** Date Change would allow ERCOT to correct the Requested Date for those 814\_10 Drop to POLR transactions that were missed when communicating the initial Drop to POLR ESI IDs.