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| **TX SET Issue Tracking Request Form**  |
| **TX SET Issue Tracking Number:** | 2019-I149 |
|  **Issue Status:** | Under Review |
| **Last Modification Date:** |  |
| **Retail Assignment Request Number:** |  |

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| ISSUE SUBMITTER SECTION: |
| **Submitter Name:** | **Submitting Company Name:**  | **Date of Submission:** |
|  Kyle Patrick | NRG | 8/13/2019 |
| **Submitter’s E-Mail Address:** | **Phone Number:**  | **Affected Transaction(s):** |
| kyle.patrick@nrg.com | 713-304-0698 |  814\_22 |
| **Issue Statement: (Short description of issue)** |
| Recommend revision to Continuous Service Agreement (CSA) process surrounding Solution to Stacking REP Rules 5 and 6. |
| **Operational/System Impact: (What is the issue doing to your system and/or operations)** |
| Customer contracts with CSA CRs are not being honored because of REP rules 5 and 6:REP Operating Rule 5: Establish Continuous Service Agreement After Move Out Results in De-energized Premise * If a REP submits an 814\_18, Establish/Delete CSA Request, with the addition indicator on an ESI ID where a move out has been submitted but is not complete, the move out will complete as if the establish Continuous Service Agreement (CSA) was not in effect and the Premise will be De-energized if there was no prior CSA relationship. If there was a prior CSA relationship, the prior CSA REP will be the REP of record after the move out.

REP Operating Rule 6: Establish Continuous Service Agreement After Move Out Results in De-energized Premise * If a REP submits an 814\_18, Establish/Delete CSA Request, with the delete indicator on an ESI ID where a move out has been submitted, but is not complete, the move out will complete as if the establish CSA was still in effect and the CSA REP will be the REP of record after the move out.
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| **Market Impact: (What is the issue doing to others)** |
|  CSA CRs who have deleted CSA relationships are receiving unauthorized CSA enrollments. |
| **Desired Outcome: (What do you expect to change)** |
|  Revise current CSA validation process. Request TEXAS SET review, but a suggestion would be for MVO process to be separated from CSA CR switch. Two days prior to the MVO date ERCOT would validate if a CSA was associated and drop trxs to TDSP and CSA CR. A proposed diagram is below. |
| **Once Completed:** |
| Please submit this completed form via e-mail to **txsetchangecontrol@ercot.com** |

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| **TX SET DISCUSSION SECTION:** |
| **Date of TX SET Discussion:** | **Change Control Created (Y/N):** | **Change Control Tracking Number:** |
| 08/21/2019:  |  |  |
| **Discussion/Revision History:** | **Referred to TX SET Subteam (Y/N):**  |  |
| 08/21/2019—TX SET attendees reviewed the scenarios and possible solutions. An alternative would be to allow the MVO to CSA to process as it is today; then have ERCOT re-evaluate if the CSA CR has changed or been removed. If this is the case, ERCOT would cancel the first MVO to CSA and resend the new one or the original straight MVO. Also it was suggested to add an effective date to the 814\_18 to specify when the CSA agreement begins.  |
| Recommended Resolution: |
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