**Why is timely and frequent customer consumption data important for REPs and Customers?**

1. Customers with IDR meters are the largest consumers of electricity in the ERCOT market. The delay in availability of monthly IDR 867\_03 meter data (vs. daily AMS) prevents meaningful analysis from being performed for these large customers. For instance, if we wanted to examine our customers usage patterns from yesterday, we could analyze AMS sites within a day or two and provide helpful feedback and actionable analysis to the customer. But for sites with IDR meters using monthly 867 transactions, that same analysis would need to wait at least 30 days for the interval meter data to be available which renders the analysis much less valuable if not completely useless. The 30-day delay means the weather patterns or business conditions have changed, seasonal patterns are already underway or transitioning, and any analysis performed for the customer is obsolete.
2. Why is this important for REPs?
	* Many customers are on products where REPs wear volumetric risk (i.e. “fixed price”). If the earliest REPs get a complete picture is 30+ days out, REPs cannot take appropriate actions to hedge their load position. More timely meter data helps REPs improve the accuracy of hedging decisions.
	* Market events such as the COVID-19 pandemic, the oil price crash, and 4CP growth make forecasting customer load and behavior increasingly difficult. More timely meter data helps REPs improve the accuracy of their load forecasting processes.
	* REPs help the reliability of the grid by offering economic response programs to customers. The delay in IDR meter data reduces the effectiveness of DR programs since customers cannot see how well they performed for nearly a month.
3. Why is this important for IDR customers?
	* For customers with index-based products such as “Real-Time Index” or “Block & Index”, it is important for the customer to understand their usage patterns to make effective hedging decisions. If a customer does not have a good understanding of their usage, it could unintentionally lead them to either make poor hedging decisions or miss economic opportunities.  A couple scenarios below:
		1. If a customer on a Block & Index product is throttling back usage in response to the pandemic, oil price crash, or other changing business conditions, holding a block quantity greater than their demand could cost them additional money when settling volumes into the real time market at lower market settlement prices. If the customer had visibility into this discrepancy, they could sell unneeded quantities into the day ahead market to mitigate risk.
		2. If a customer on a Block & Index product is ramping up demand in the summer months, they need to understand with a great deal of accuracy how their usage is increasing relative to their block position to ensure they are properly hedged. Waiting +30 days is too long to make informed hedging decisions in the summer and is a significant disadvantage to IDR customers.
	* Unless a REP is willing to accept the cost of installing and managing shadow meter(s), customers receiving monthly IDR 867\_03 meter data must fund the cost of shadow meter device installation and service if they want to get access to their own data sooner. The accuracy of such devices can also be problematic.
4. REPs have invested significant dollars in recent years on tools that provide a wealth of information to large business customers based on their consumption data. These tools and the information they provide are hindered by the current delay in availability of IDR meter data.