LRITF Meeting

Tuesday, November 1, 2022

9:30 AM

ERCOT Building

8000 Metropolis, Building E

Austin, TX 78744

 **MEETING NOTES**

Chris Rowley, co-Chair of the LRITF opened the meeting and welcomed attendees.

Chris asked those attending in person to please introduce themselves.

Those attending in person or via WebEx are listed below.

 Name Company

* Bill Snyder AEP
* Debbie McKeever Oncor
* Sam Pak Oncor
* Chris Rowley Oncor
* Jerry Huerta ERCOT
* Jordan Troublefield ERCOT
* Katherine Thurman ERCOT
* Paul Yockey ERCOT
* Mark Ruane ERCOT
* Ted Hailu ERCOT
* Dave Michelsen ERCOT
* Janice Ayson ERCOT
* Sheri Wiegand TXU
* John Schatz TXU
* Steve Wilson TXU
* Steven Pliler TXU
* Kyle Patrick NRG
* Lauren Damen NRG
* Dee Lowerre NRG
* Paula Shadle NEC
* Connie Hermes NEC
* Ashley B LP&L
* Dailey Smith LP&L
* Jamie Wood LP&L
* Carina Gonzales LP&L
* Michael Winegeart LP&L
* Krista Ortiz LP&L
* Clint Gardner LP&L
* Jenny Wood LP&L
* Pam Shaw LP&L
* William Butler LP&L
* Carolyn Shellman Legal for LP&L
* Melissa Maldonado LP&L
* Jamie Wood LP&L
* Amy Sue Stirland Lubbock
* Eric Blakey Perdernales Electric Coop
* Shawnee Claiborn-Pinto PUCT
* Floyd Walker PUCT
* Dale Gibbs Just Energy
* Diana Rehfeldt TNMP
* Tyler Krueger Big Data Energy Services
* Tagg Jefferson Octopus Energy
* Yohan Sutjandra OE
* Kathy Scott Centerpoint
* Eric Lotter GridMonitor
* Frank Nunes VertexOne
* Deb Belin Earth Etch
* Angela Ghormley Calpine
* Adrienne Downey
* Courtney Jenkins
* Jeff Shoaf
* Malcolm Ainspan
* Mary McIvor
* Suzanne Bertin
* Brandyn Sanchez
* Behnaz
* Chris
* Adri
* Rebecca
* Sarah
* MC
* Call-in User\_7
1. **Antitrust Statement**

Chris proceeded to read ERCOT’s Antitrust Statement.

1. **Agenda review**, see names for introductions above.

Chris reviewed the agenda and provided a brief overview of the status for agenda items. There were no questions or changes requested. Agenda stands as is.

1. Antitrust Admonition
2. Introductions and Agenda Review
3. Texas SET Testing update
4. CSA and Mass Transition Transactions
5. Status of Pro Forma Tariff
6. Continued Discussion of Customer Data
7. Customer Choice Billing
8. Review List of Integration Activities
9. Discussion of Differences between RMG Section 7 and 8
10. Open Discussion
11. Adjourn

Chris moved to the TX SET presentation and asked Kyle to give the update.

1. **Texas SET Testing Update**

Kyle Patrick presented an update which included activities for the 2023 Market Test Flights. The 2023 plan includes 3 flights as usual but next year’s tests will include one flight strictly for LP&L certification and 2 standard flights.

*Note! Kyle’s presentation can be located on the LRITF meeting page for today. See link below.*

*https://www.ercot.com/calendar/event?id=1661202923085*

Kyle explained why the timeline is structured as such and spoke to each date. Once the timeline is final ERCOT and MPs signed up to test will need to comply with the dates for activities. Steps can’t be excluded and once the flight sign up has closed, it can’t be opened up. It’s how the FlighTrak system works. Kyle also provided comments of how TX SET determined the flight specifics for the Lubbock flight.

Kyle’s presentation included dates which range from January 11 through June 23:

January 11 - Notice to market announcing the Testing Flight

Feb 03 - Flight Administrator emails to MP Admins notifying them of necessary steps prior to sign up deadline

*Mar 08* - Sign up deadline

*Mar 13* - Testing specs are submitted in FlighTrak

*Mar 14* - Connectivity and Penny Testing begins (~96 MPs will perform these tasks)

*Apr 24* - Day 1 transactions flow

*May 05* - Flight scheduled to conclude

*May 08* - Contingency period begins

*Jun 23* - Contingency period ends

Kyle mentioned the certification letter from ERCOT and that can be received couple of weeks after testing is completed.

Debbie stated the letters are not sent from ERCOT until all items for the certification are complete.

Paul Yockey said that info is included in the testing notification from ERCOT, on every single one.

Paul Yockey stated that Lubbock has made the decision to test Connectivity and Penny Test with each

Relationship/Duns, not just the Parent company.

“96” is listed on the slide but Paul said it could be in the neighborhood of 200.

Current plans include 6 or 7 of those stand alone or parent companies will complete end to end testing.

To help make certain the flight can be completed, the contingency period is being extended.

That will allow time for Lubbock to do other testing as they would like.

Would also allow time to finish up production connectivity or penny tests.

Kyle said that Lubbock is beginning to test with their service provider and that’s a good sign.

Tyler asked if there would be any fees. Kyle responded and said no fees.

John said he would like to address a concern that was brought up at TAC.

One of the TAC attendees had asked for the 2023 Market Test flight plan to be reevaluated.

The reason is because the 2023 plan only allows 2 opportunities for new CRs to test. New

CRs/uncertified cannot test in the Lubbock Flight. Lubbock flight is designed to certify Lubbock.

The TAC attendee asked If the 2023 test plan can be changed to allow another opportunity for the CRs to test.

John, Debbie, some others that attended TAC stated that prior notification would help those looking to come into the Market aware that 2023 would be different.

Those that attended TAC agreed and recommend that one or more market communication/notification be provided as far in advance as possible, stating the limitations and plans for 2023 testing. This would help those new or existing CRs to understand testing options and plan accordingly.

The detailed communication/notice of the 2023 Flight Plan is needed because it’s different from the past 10 years or so. Many looking to test for one reason or another do plan that in alignment of the 3 flights are year timeline.

Notification of the change to the market is needed and it needs to be provided up front. Debbie stated that another conversation had taken place at RMTTF and it was stressed there was a need to provide communication of the Lubbock certification and include changes for testing in 2023. There are entities seeking to participate in Lubbock territory as soon as possible following Lubbock’s certification (when they are open for competition). If those parties aren’t aware of the change, they could miss the fact that the only way that would be possible is for their companies to be certified prior to the Lubbock test flight. Otherwise they would need to wait until the last flight of 2023. Would not be able to operate in the Lubbock territory on October 1 (date planned for Lubbock to be open for Customer Choice).

John, Chris, Sheri others provided details that the notification could include and should include that any new CRs planning to compete in the Lubbock Territory as soon as competition is open, they must be certified prior to that date and the only opportunity for that is the first flight of 2023.

Those participating in the discussion were in agreement a communication is needed and to be sure to include the test flight for Lubbock will only include previously certified CRs. Uncertified CRs will be excluded.

Dave Michelson said that he agrees this communication is needed but it should only come from one entity and not multiple. He isn’t sure who that should be but it needs to be from the same entity each time.

ERCOT currently provides the market notices for Market Testing.

Some attending TAC recommended that one or more market communication/notification be provided as far in advance as possible, stating the limitations and plans for 2023 testing. This would help those new or existing CRs understand testing options/restrictions and plan accordingly.

Those participating in the discussion were in agreement a communication is needed and to be sure to include the test flight for Lubbock will only include previously certified CRs. Uncertified CRs will be excluded.

The 2023 Market Testing flight schedule was displayed on the screen.

Note! Full information for the 2023 Flight info is available on ercot.com at the following link:

<https://www.ercot.com/services/rq/lse/tfi>

Note! 2023 Flight Registration deadlines and registration can found on ERCOT.com at the following link: <https://www.ercot.com/services/rq/lse/tfi>

Info below was taken from the link. See text in italics.

Much of the discussion includes information copied below. See text in italics below.

*Dates for 3 Test Flights 2023*

***Flight 0223****:*

*February 7, 2023 – March 10, 2023*

*Application Processing Deadline\* January 18, 2023 5:00 p.m. CPT*

*Flight Registration Deadline February 1, 2023 5:00 p.m. CPT*

*Comments: Flight tests for Texas Standard Electronic Transaction (SET) Version 4.0A*

***Flight LPL0423****:*

*March 14, 2023 – May 5, 2023*

*Application Processing Deadline\* N/A Only Existing CRs are eligible for this flight\**

*Flight Registration Deadline March 8, 2023 5:00 p.m.*

*Comments: Flight tests for Texas Standard Electronic Transaction (SET) Version 4.0AFlight test for existing REPs to test with Lubbock Power and Light for the transition to retail competition Flight tests for Texas Standard Electronic Transaction (SET) Version 4.0A*

***Flight 1023****:*

*September 12, 2023 – October 20, 2023*

*Application Processing Deadline\* August 16, 2023 5:00 p.m. CPT*

*Flight Registration Deadline September 6, 2023 5:00 p.m. CPT*

*Comments: Flight tests for Texas Standard Electronic Transaction (SET) Version 4.0A*

*\*See Registration Information below for mandatory steps to be completed prior to the Application Processing Deadline.*

*\** ***Existing CRs that do not have a FlighTrak Login must submit a FlighTrak Administrator Form a minimum of ten (10) business days prior to the registration deadline to be setup to register for this flight.***

*Registration Information*

*Pursuant to the ERCOT Protocols, ERCOT has ten (10) Business Days to approve or reject an LSE application for registration once it has been submitted and deemed complete.*

*In order to ensure that ERCOT has adequate time to evaluate an application, any new CR wishing to participate in an upcoming retail market test flight should undertake the below-referenced steps****at least ten (10) Business Days before the Application Processing Deadline****indicated above.*

*Failure to do so could render the CR ineligible for the upcoming flight.*

*The following steps must be completed by any new CR wishing to participate in an upcoming retail market test flight, and processed by ERCOT, before the Application Processing Deadline:*

* *Apply for and receive a Data Universal Numbering System (DUNS) number that is accessible by ERCOT on*[*www.dnb.com*](http://www.dnb.com/)*(Note: ERCOT must be able to view and access the DUNS Number through*[*www.dnb.com*](http://www.dnb.com/)*by the Application Processing Deadline; merely obtaining a DUNS Number from Dun and Bradstreet the day of the Application Processing Deadline is not sufficient, as it may take Dun and Bradstreet several days to enter the DUNS Number into their system);*
* *Submit an LSE registration form and the appropriate application fee to ERCOT;*
* *If registering as a Retail Electric Provider (REP), apply for REP certification with the*[*Public Utility Commission of Texas*](http://www.puc.state.tx.us/industry/electric/business/rep/Rep.aspx)*; and*
* *For more information, send an e-mail to**RetailMarketTesting@ercot.com**.*

***Comment*! Lubbock goes live October 1**

Kyle explained Round Robin which is what will be used for the Lubbock flight. “This group could use the case that was provided in the incident of Hurricane Harvey where Round Robin was used and Centerpoint accepted the other TDSPs validation as sufficient for the CRs being certified for Centerpoint’s territory.

*Note!* In all instances, all non-established EDI Service Provider must test end to end. That cannot be bypassed.

*Question*: What is the difference between a VREP and DREP?

*LP&L response*: All those type questions need to be sent to Felix at MYLUBBOCK.US.COM

1. **CSA and Mass Transition Discussions**

Dave Michelson mentioned that he will speak to each of these (CSA and Mass Transition).

 CSA:

 Dave noted that Lubbock wants to operate in the same way that the IOUs operate and not as included in the documentation for MOUs. There is work being done behind the scenes 15.1.9 is the manner in which they want to operate.

 Mass Transitions:

 Dave mentioned that ERCOT will still be initiating the transactions which is the same for everyone. Transactions will flow the same way but the allocation will be different since LP&L is a MOU.

Ted Hailu mentioned that the CSA process has been written around the past entity which was Nueces. The fact that Lubbock is coming in, there’s an issue here. The Protocols need to be modified to support the changes (allow MOU to support processes as IOU and not as what is currently included in ERCOT Protocols/other rules/guidelines.)

Jerry said that there is a bright line between 15.1.9 (which is the path they want to go) and not the direction for the requirements

Jerry said he has been looking in PURA and there is nothing that prohibits Lubbock from operating in that manner.

Ted stated that ERCOT and Lubbock are working together to meet and that the rules and protocols will be there when they come in the market.

Lubbock doesn’t want to be an IOU and they don’t want to disregard the MOU rules, they will follow the rules.

Ted said that they are meeting this afternoon and working on a draft.

Sheri asked if that draft could be completed such that it can be seen at the next LRITF meeting.

Ted didn’t state that could be accommodated.

1. **Status of the pro-Forma tariff**

Chris provided an update and said Lubbock completed a draft and sent to the PUCT.

Jenny said that she didn’t want to speak for the PUCT as the redlines have been submitted to PUCT.

Shawnee responded and said that when she received it that it looked like a TX SET guide or a RMG and there was a little too much detail and maybe there are references that can be removed or changed to maybe “applicable legal authority” like some of the other rules. This would help those in the future that might want to come into the market. This would be good and maybe we can have chapter 5 updated which would be easier for new MOUs that want to operate like an IOU.

 Shawnee said the red lines have been shown to COOPS/others informally. She is trying to meet the next open meeting on November 30 at 9:30 a.m. maybe that would be taken up at that meeting and adopted by the PUCT sometime in early 2023.

Sheri asked about comments being due and Shawnee said it is this Thursday.

Shawnee apologized for the quick turnaround.

Lubbock thanked Shawnee and others at the PUCT.

The Control # is 54212 REVIEW OF 16 TAC § 25.215, RELATING TO TERMS AND CONDITIONS OF ACCESS BY A COMPETITIVE RETAILER TO THE DELIVERY SYSTEM OF A MUNICIPALLY OWNED UTILITY OR ELECTRIC COOPERATIVE THAT HAS IMPLEMENTED CUSTOMER CHOICE

Lauren asked about definition of standard meter so that was not included becuase it seemed like it was defined as a AMS type meter.

Lauren also asked about chapter 5, for critical care and could that be included? Shawnee responded that an MOU is subject to the same rules, however, if they want to follow that rule then that’s great but someone else might have differences such as temperature.

Shawnee said that if anyone wants to contact her to please feel free.

1. **Continued Discussion of Customer Data**

Chris said we will look at some of the customer data issues and asked Jenny to talk through this. They are discussing with ERCOT and think that issue is being addressed and close to a resolution. Utilities code 812 prevents a government operated utility from disclosing any customer data with an entity as ERCOT. Lauren asked about the approach and Jenny said they are working with ERCOT Legal.

1. **Customer Choice Billing (per tariff supported by PURA)**

Chris noted another discussion point about the customers being able to choose who bills them. Jenny said PURA chapter 40 does permit customers from being able to receive bills and that’s statutory language and maybe look at language for the next session and there needs to be an interim step for operating as an IOU.

Ted said this is a related TDSP and REP issue and how can we operate until rule changes are done?

Ted asked that this be added to the list that this group manages. Sheri said that she has done that.

*Question*: Who does the billing?

*Discussion:* The different options need to be evaluated/considered in order to relax that requirement.

The rule changes can be driven.

Is there a workable solution until those are completed?

Jenny said that she was thinking operationally it can happen but technically there may complexity.

Sheri stated that this is very challenging to the REPs given that it might require system changes.

John noted that whatever happens, the existing structure and transaction flow need to be maintained.

Chris and Lauren brought up the EFL (Electricity Facts Label) that may not change.

Regarding who bills the customer, more discussion is needed to come to a workable solution.

Sheri will assemble a group offline to frame the issue, review the options, and suggest language changes as needed in the RMG/protocols.

**8. Review List of Integration Activities**

Two new items were added to the list.

Sheri brought up the list and modified the activity list to include:

1. Customer Billing – see detail in the list – time will be added to Q4 of 2022.

 There would be a requirement.

Lauren said that she looked at the implementation guides and there is a process/swim lane that supports the model that Nueces is currently operating under. CRs use the 810\_03 for those operating in the Nueces territory.

Discussion continued for “who is working on this/who can fix this?”

A separate meeting can be held to discuss and include SMEs, others.

Sheri said that everyone’s got their assignments/marching orders are for moving forward.

1. Membership ID in transactions.

Dave mentioned that the membership requirement id will be removed and is part of the TX SET changes

At the next meeting we should have a better feeling of where we are with the tariff.

9**. Discussion of differences between RMG Sections 7 8**

Chris stated there could be a matrix created that could identify differences.

There is a section in the RMG section “Notable differences between the IOU TDSP market and the MOU/EC TDSP. See Section 7 (4)

**10. Open discussion**

Chris asked if there are any questions on the phone

The following items discussed today for possibly being discussed at the December 6th meeting include:

 Status of the pro Forma Tariff

 Customer Data

 Customer Billing responsibilities (separate meeting/brainstorming session to be held prior to next LRITF meeting and include those that work with transactions, experts, others)

**11. Adjourn**