***Lubbock Retail Integration Task Force***

***Summary of Major Implementation Items***

***November 1st, 2022***

**CSA & Mass Transition Transaction Workflows**

**Issue**: Currently, ERCOT’s functionality for CSA and Mass Transition workflows for market participants registered as MOUs allows for 814\_22s (CSAs) and 814\_14s (Mass Tran Drops) to flow back to the MOU to act as the provider. LP&L prefers to operate as an IOU in this space (i.e. CSAs) where the customer would transition to a designated REP.

**Resolution**: ERCOT staff is working to update applicable protocols and guides to allow flexibility for an MOU entering retail competition to select a preferred operation – an MOU path or an IOU path.

**Update**:

* Review of Nodal Protocols 15.1.9 – IOU and 15.1.10 – MOU
* ERCOT is planning to review at the next TF meeting in December
* For Mass Transition language, transaction flows would be the same as an IOU, only distribution of ESIs would be handled by MOU

**Pro Forma Tariff**

**Issue**: Pro Forma tariff (PUCT Subst. Rule 25.215) for MOUs has not been reviewed since market open and was essentially drafted to align with a specific market participant’s operation. The existing tariff as written restricts an MOU entering retail competition by not allowing the flexibility for an MOU to operate as an IOU (particularly with customer billing).

**Resolution:** LP&L has worked with market participants and PUCT Staff to draft redlines to existing pro forma tariff to allow for flexibility whereby moving company-specific operational preferences into Chapter 5 – i.e. standardized optionality

**Update:**

* LP&L has submitted redlines to PUCT Staff for review
* PUCT Staff seeking comments by 11/7 of Staff initial redlines
* PUCT Staff planning for review by Commissioners at 11/30 or 12/15 Open Meeting
* Comment period would occur after Commissioner review
* Some initial concerns with redlines were particularly around metering, where some MOU/Co-ops may not have deployed AMI metering (definitions, timelines, etc.)

**Customer Data Issue**

**Issue:** Per LP&L TX Utility Code 182, LP&L cannot share any customer data with an entity as ERCOT (REPs are not included in the restriction). This will impact 867s (consumption data), Mass Customer Lists (typically distributed by ERCOT), Customer Billing Contact Information (monthly CBCI submitted to ERCOT), and daily LSE files.

**Resolution**: ERCOT and LP&L are working toward a clear solution/resolution

**Update**:

* ERCOT and LP&L are planning to present a solution at next month’s task force meeting

**Customer Choice Billing**

**Issue:** Per PURA Section 40.057, an end use customer in an opt-in MOU TDSP service area has the option of receiving a single bill (delivery + energy) or separate bills for each. LP&L intends to and is prepared to adopt the single bill scenario through REPS, however, a plan will need to be drafted for the instances in which a customer chooses for separate bills

**Resolution**: REPs and TDSPs will need to determine the impact and timeline of any protocol / guide / system changes that are needed to support customer choice billing

**Update**:

* REPs/TDUs will need to frame issue and possible solutions – both from a regulatory and operational perspective
  + Legislative change – possibility for upcoming 2023 session
  + Based on existing language (see below), is LP&L able to contract with a REP to provide billing? Or will LP&L need to retain billing of delivery charges?
  + Is a REP, acting as a billing agent, able to provide a consolidated bill or must provide two bills (delivery and energy)
  + Operationally, can existing transaction flows support separate billing?
  + What are other downstream impacts?
    - EFLs
    - Bundled products
    - Settlement
  + Can the ERP process somehow be leveraged to support the few customers who might choose separate billing?
  + Is LP&L able to enact a Discretionary Service Charge for customers ‘opting out’ of consolidated billing?
* ERCOT indicated they would support/facilitate any changes, however, drafting language revisions should originate from the REPs/TDUs.

**TXSET Test Flight LPL0423**

**Update**:

* Flight test LPL0423 approved by RMS for existing REPs only
* If new REPs want to enter the LP&L market, they must participate in the first flight 0223 with an application deadline of 1/18/23 including all registration support (PUCT, etc)
* Outlining 7 market participants to perform full end to end testing with the understanding LP&L will accept the results to apply to other REPs
* All REPs will be required to conduct penny and connectivity testing via FlighTrak
* Ensure uniqueness of flight testing is clearly communicated to the market
* ERCOT has market notice teed up for distribution – will circulate to RMS, LRITF, and TXSET leadership prior to distribution (*Complete – market notice distributed 11/3/22)*