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Ana Trevino  
Filing Clerk  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P.O. Box 13326  
Austin, TX 78711

**RE: PUC Docket No. 50664 Issues Related to the State of Disaster for Coronavirus Disease 2019**

Dear Filing Clerk:

On April 14, 2020, the Joint TDUs (AEP Texas, CenterPoint, Oncor, and TNMP) will hold a second workshop with the REPs related to the COVID-19 Electricity Relief Program (ERP) process. Attached is the presentation prepared by the Joint TDUs for the workshop that contains information on the revised COVID-19 ERP process. Additionally, attached is a set of Questions and Answers prepared by the Joint TDUs responsive to questions initiated by REPs during the first workshop.

Sincerely,

Chris Rowley  
Oncor

Attachments

# COVID-19 Electricity Relief Program (ERP) Process Questions and Joint TDU Answers

4/9/2020

## TDU Delivery Charge Suppression Process

**1. Which customers are ERP-qualified for TDU delivery charge suppression and energy charge reimbursement due to the COVID-19 Electricity Relief Program?**

Solix, the Low-Income List Administrator (LILA), will facilitate the identification of customers who are ERP-qualified. REPs should consult the Commission order(s) regarding ERP and seek guidance from Commission Staff regarding the suppression of TDU delivery charges.

**2. When will the joint TDUs start accepting MarkeTraks for suppression of TDU charges?**

REPs can begin submitting TDU delivery charge suppression spreadsheet through MarkeTrak on April 20, 2020 to the joint TDUs if the customer meets the requirements set by the Commission.

**3. When should the REP initiate the MarkeTrak to suppress TDU charges?**

Beginning April 20, 2020, the REP may submit the TDU delivery charge suppression spreadsheet through MarkeTrak once the REP and customer meets the requirements set by the Commission.

**4. When a REP submits a MarkeTrak to suppress TDU charges, the customer is already past due on their payment to the REP. Will the TDUs cancel 810\_02 invoices received by REPs prior to the suppression request?**

After the TDU has processed the TDU delivery charge suppression request, the TDU will cancel the 810\_02 invoice immediately prior to the completion of the TDU delivery charge suppression request and will send a replacement invoice with suppressed TDU delivery charges.

TDU delivery charges will be suppressed for subsequent 810\_02 invoices for the duration of the COVID-19 Electricity Relief Program unless the REP notifies the TDU to remove the customer from the program, if the TDU receives a Move In or Move Out, or as otherwise directed by an Applicable Legal Authority (ALA).

**5. How will the charges be displayed on the 810\_02?**

Please refer to the TDU-REP Workshop 2 presentation for TDU specific 810\_02 information. A link to the TDU-REP Workshop 2 presentation can be referenced at the end of this document.

**6. Can you provide an example of why a REP would submit a delete subtype MarkeTrak (ERP\_D) for suppression of TDU charges?**

- If Solix removes the customer's COVID-19 Electricity Relief Program eligibility because the customer fails to provide documentation of unemployment within 30 days
- If the customer drops off the LILA list
- If the REP inadvertently submitted a MarkeTrak on an incorrect ESI ID

- 7. If the customer is removed from the ERP-eligible list due to failure to provide proper documentation of unemployment within 30 days, will the ESI ID be cancel/rebilled to reapply the suppressed TDU charges?**

No. However, the REP does need to submit a delete subtype MarkeTrak (ERP\_D) upon removal of the customer from the ERP-eligible list so the TDU can begin applying TDU delivery charges on subsequent 810\_02 invoices.

- 8. Do REPs need to submit a delete subtype MarkeTrak (ERP\_D) for suppression of TDU charges if a customer Moves In, Moves Out or Switches away?**

No, REPs do not need to send a delete subtype for a Move In, Move Out or Switch. TDUs will reinstate delivery charges upon Move Ins and Move Outs.

- 9. If a customer switches to another REP will the suppressed TDU charges follow the customer to their new REP?**

Yes. Additionally, Mass Transition events are considered to be switches; therefore, suppressed TDU charges will follow the customer to the new REP.

- 10. Will TDU suppressed charges be visible to the REP in order to unbundle rates?**

AEP, TNMP, and Oncor will show the suppressed charges on their 810\_02 invoices. CenterPoint will make a report of suppressed charges available to REPs upon request.

- 11. If a customer has distributed renewable generation, such as solar panels, should the REP request reimbursement for the total kWh delivered (inflow)?**

Yes.

- 12. If the REP has received the 810\_02 invoice from the TDU, but the REP has not sent the payment and 820 remittance yet, should the REP short pay the TDU?**

No. After the TDU has processed the TDU delivery charge suppression request, the TDU will cancel the 810\_02 invoice immediately prior to the completion of the TDU delivery charge suppression request and will send a replacement invoice with suppressed TDU delivery charges.

If the original invoice becomes due before the TDU cancels it, the REP should pay the entire 810\_02 invoice and submit the corresponding 820.

#### REP Reimbursement Spreadsheet Process

- 13. How can a REP request the Reimbursement Spreadsheet template?**

A REP can request a copy of the spreadsheet from one of their TDU contacts.

- 14. How should a REP submit their reimbursement spreadsheet?**

Each REP requesting reimbursement must send one TDU-specific spreadsheet to each TDU on the 15<sup>th</sup> of each month. The spreadsheet must be sent via MarkeTrak using the Market Rule subtype

with "ERP\_R" in the Market Rule field. If the REP has multiple DUNS numbers, they must send a separate spreadsheet and create a separate MarkeTrak for each DUNS.

**15. How does a REP include the MarkeTrak number on the reimbursement spreadsheet?**

The REP must first submit the ERP\_R MarkeTrak with the Market Rule subtype for reimbursement to obtain the MarkeTrak number. Once the REP has the MarkeTrak number, they can populate the MarkeTrak number in the invoice field on the spreadsheet. The REP can then attach the spreadsheet to the MarkeTrak and re-submit it.

**16. Can a REP submit one reimbursement spreadsheet for multiple DUNS numbers?**

No. If the REP has multiple DUNS numbers, they must send a separate TDU-specific spreadsheet and create a separate MarkeTrak for each DUNS.

**17. After the REP has submitted their reimbursement spreadsheet on the 15<sup>th</sup> of the month, when will the TDU process the invoice for payment?**

TDUs will make reimbursement via Electronic Funds Transfer (EFT) to the REPs within 14 days of receipt of the (ERP\_R) MarkeTrak for all valid ESI IDs, provided the REP has returned documentation to the TDU to setup the EFT.

**18. When submitting a reimbursement request, must a REP currently be the REP of Record?**

No. A REP may request reimbursement for energy charges that correlate to any 810\_02 invoice with suppressed charges as long as the REP has not previously requested reimbursement for the same invoice.

**19. What ESI IDs should be included on the monthly reimbursement spreadsheet submitted on the 15<sup>th</sup> of each month?**

A REP may request reimbursement for energy charges that correlate to any 810\_02 invoice with suppressed charges as long as the REP has not previously requested reimbursement for the same invoice.

**20. Can a REP submit reimbursement charges for more than one 810\_02 invoice on the same reimbursement spreadsheet?**

Yes. A REP may request reimbursement for energy charges that correlate to any prior 810\_02 invoice with suppressed charges as long as the REP has not previously requested reimbursement for the same invoice.

**21. After submitting a reimbursement spreadsheet, will the REP be reimbursed for energy charges through the 810\_02 process?**

No. The TDUs will reimburse each REP through Electronic Funds Transfer (EFT) to the REP's designated bank account.

**22. How will the TDUs validate the reimbursement spreadsheets?**

TDUs will ensure all information on the spreadsheets are accurate, including, but not limited to, that the REP has requested TDU delivery charge suppression for the ESI ID, the 810\_02 invoice number is valid, the requested kWhs match the 810\_02 invoice, and the REP has not previously claimed reimbursement for the same 810\_02 invoice. The TDU will also confirm the volume of a REP's reimbursement requests against the REP's total ERP-eligible customer count.

**23. Will the payment from the TDU contain a listing of all the ESI IDs or specific 810\_02s being reimbursed?**

When a TDU completes the MarkeTrak created by the REP for the submission of the reimbursement spreadsheet, the TDU will attach the reimbursement spreadsheet showing the number of ESI IDs reimbursed and the amount to be reimbursed. The detail tab will include a list of all ESI IDs and 810\_02 invoices including comments if any were not reimbursed and the reason they were not reimbursed.

**24. Is there a limit of how many ESI IDs a REP can submit on one reimbursement request?**

No.

810\_02 Invoice Impacts

**25. Will the TDUs send the kWh on the 810\_02 invoice?**

Yes.

**26. What is the Texas Set SAC04 code and description for the COVID-19 Electricity Relief Program rider?**

- The SAC04 code is: MSC024
- The SAC15 description is: "Electricity Relief Program"

**27. Is the rider a non-bypassable charge?**

Yes.

**28. Will the TDU suppress all charges on the 810\_02 invoice for ERP customers?**

The TDUs will suppress all charges except for late payment fees, tampering and securitization charges (reference TDU-REP Workshop 2 presentation for TDU specific suppression practices).

Other

**29. If a Disconnect for Non-Pay order (DNP) is sent by the REP in error for a customer eligible for the COVID-19 Electricity Relief Program, will that DNP automatically be rejected/cancelled?**

The Commission order does not require the TDUs to reject or cancel DNPs for customers on the COVID-19 Electricity Relief Program. If a REP issues a DNP order for an ERP-eligible customer's premise, the REP should immediately move to reconnect the customer.

**30. How can a REP receive a copy of the presentation material reviewed during the REP-TDU Workshop?**

A REP can request a copy of the presentation from one of their TDU contacts. The presentation is also filed in PUC Project 50664 - ISSUES RELATED TO THE STATE OF DISASTER FOR CORONAVIRUS DISEASE 2019. A link to the TDU-REP Workshop 2 presentation can also be referenced at the end of this document.

**31. At the conclusion of the COVID-19 Electricity Relief Program, how will the balance of the Rider be allocated?**

For any amounts recovered under the rider that remain after the end of the COVID-19 Electricity Relief Program, the TDUs will issue a refund through REPs to end-use customers in the same manner the rider was charged. REPs must pass through any monies refunded to customers.

**32. In the event of a Mass Transition, how will the TDUs notify the Gaining POLR REP of ESI IDs that have suppressed TDU delivery charges?**

The TDUs will provide the Gaining POLR REP with a list of ESI IDs that have suppressed TDU delivery charges.

**TDU & REP Workshop II: COVID-19 Electricity Relief Program (ERP) presentation:**

<http://interchange.puc.texas.gov/Search/Filings?UtilityType=A&ControlNumber=50664&ItemMatch=Equal&DocumentType=ALL&SortOrder=Ascending>