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PROJECT NO. 50664

ISSUES RELATED TO THE STATE OF
DISASTER FOR CORONAVIRUS
DISEASE 2019

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PUBLIC UTILITY COMMISSION
OF
TEXAS



**JOINT TDU INFORMATIONAL FILING REGARDING THE COVID-19
ELECTRICITY RELIEF PROGRAM**

AEP Texas Inc., CenterPoint Energy Houston Electric, LLC, Oncor Electric Delivery Company LLC, and Texas New Mexico Power Company (collectively “Joint TDUs”) make this informational filing regarding the COVID-19 Electricity Relief Program (“COVID-19 ERP”) to assist the Public Utility Commission of Texas (“Commission” or “PUC”) in any further refinement or clarification of the COVID-19 ERP going forward. The information provided here seeks to clarify some of the technical and operational issues faced by the Joint TDUs in implementing the program.¹

In particular, the Joint TDUs provide the following information regarding the suppression of TDU delivery charges and the retail electric providers’ (“REPs”) submission of invoices for reimbursement:

- Once a REP submits a MarkeTrak with the ESIIDs eligible for the COVID-19 ERP, the TDUs will cancel associated invoices submitted immediately prior to the suppression request. The TDU will then reissue that invoice with the TDU delivery charges suppressed. All subsequent invoices for the relevant ESIID will have the delivery charges suppressed as well, for the duration of the COVID-19 ERP unless a move-out, forced move-out, or suppression deletion request from the REP is received before the program ends. The Joint TDUs will not cancel and rebill invoices that were sent before the billing cycle immediately prior to the suppression request because some TDUs are unable to process requests for suppression that were sent prior to the previous month.

¹ Some of these issues and related policy questions were raised by the Alliance for Retail Markets and Texas Energy Association of Marketers in their respective requests for clarification filed in this project on April 13, 2020. This informational filing is not intended to be a complete response to those filings by the Joint TDUs or the individual TDU companies.

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- The Joint TDUs are in the process of implementing the system logic to suppress the charges within three business days for the ESIID they receive via a MarkeTrak from the REPs. The logic will suppress wires charges for the current billing cycle. If the REP was the REP of record for the ESIID in the prior month's billing cycle, then the prior monthly bill will be canceled and rebilled with the delivery charges suppressed. For some of the TDUs, the cancel and rebill process related to the suppression of the delivery charges is a manual one, but efforts are underway to automate a portion of the process. Even with this automation, there will still be a large amount of manual work involved in the process.
- Instead of REPs submitting a MarkeTrak for each new ESIID to be included in the COVID-19 ERP as initially proposed, REPs will provide one MarkeTrak to each TDU with a TDU delivery charge suppression request spreadsheet attached for all ESIID's to be added each day. This change was based on feedback the Joint TDUs received from ERCOT. ERCOT informed the Joint TDUs that receiving individual MarkeTrak's for each ESIID (which could reach possibly hundreds or thousands in a single day) would potentially overwhelm its system.
- The TDU delivery charge suppression request spreadsheets to be submitted by REPs include fields to provide information needed for validation for customers' inclusion in the COVID-19 ERP. These fields request information, including whether:
 - the REP is the current REP of record,
 - the customer is a residential customer,
 - the customer's bill is past due and subject to a disconnection for non-payment notice,
 - the customer has indicated an inability to pay,
 - the date of Solix eligibility, and
 - the date a deferred payment plan was offered to the customer.

These fields reflect issues highlighted by Commission staff in the Questions and Answers Related to the COVID-19 ERP document circulated to participants on the April 1, 2020 market call, attached to this pleading as Exhibit A.

The Joint TDUs will continue to strive for an efficient and smooth implementation of the COVID-19 ERP and to fulfill the intent of the PUC's March 26, 2020 orders. The Joint TDUs have held two market workshops to explain the process and answer questions. The Joint TDUs

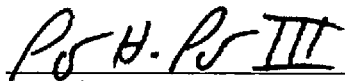
are available and ready to provide any information regarding the technical capabilities and limitations of the Joint TDUs as the COVID-19 ERP moves forward.

Respectfully submitted,

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Questions and Answers related to the COVID-19 Electricity Relief Program

Toolbox

Commission Order Related to COVID-19 Electricity Relief Program	http://interchange.puc.texas.gov/Documents/50664_107_1057678.PDF
PUCT Executive Director Memo on Timing	http://interchange.puc.texas.gov/Search/Documents?controlNumber=50664&itemNumber=144
Electric Substantive rules (especially Subch. R)	http://puc.texas.gov/agency/rulesnlaws/subrules/electric/Electric.aspx
FAQ on the PUC's Response to COVID-19	http://www.puc.texas.gov/covid-19/
TDU Presentation from REP Workshop and TDU Electricity Relief Process Question & Answers	http://interchange.puc.texas.gov/Search/Documents?controlNumber=50664&itemNumber=154
PUCT's Customer Protection Division for customer calls	888-782-8477
Solix for customer calls	866-454-8387
Online access to Solix:	https://www.txcovid19erp.org/
Email for questions to PUCT staff	Covid19Relief@puc.texas.gov

Note: On March 26, 2020, the Commission issued an [Order Directing Certain Actions and Granting Exceptions to Certain Rules](#). This Order directs, pursuant to 16 Texas Administrative Code (TAC) §§ 25.480(j)(1)(B) and 25.498(i)(1)(B), all retail electric providers (REPs) to offer a deferred payment plan (DPP) to customers, upon request. This requirement is independent of the COVID-19 Electricity Relief Program (ERP) and applies to all customers subject to the Commission's customer protection rules.

This document is intended to provide information to market participants about the COVID-19 Electricity Relief Program (ERP). This document is not an exhaustive list of all relevant information and was compiled by members of Commission Staff as a reference. This document is not a Commission order. To the extent that any provision herein conflicts with a Commission order, the order controls. Additionally, this document may be revised in the future to implement Commission directives.

Customer Eligibility

Question	Answer
Note: <i>Once a residential customer is identified as being ERP-eligible, the only immediate effect of eligibility is that the Retail Electric Provider (REP) cannot request disconnection of that customer and the customer is eligible for a deposit waiver. A Transmission and Distribution Utility's (TDU) obligation to suppress delivery charges and REP's ability to seek energy charge reimbursement through ERP do not automatically apply based on ERP eligibility alone.</i>	
Which customers are eligible for the COVID-19 Electric Relief Program (ERP)?	A residential customer who is either currently on the Low-Income List Administrator (LILA) list or is unemployed due to the effects of COVID-19 and self-enrolls with Solix using Texas Workforce Commission (TWC) documentation. This document refers to these LILA and self-enrolled (TWC) customers as ERP-eligible .
How will a REP know a customer is ERP-eligible?	Each REP will receive a list of its ERP-eligible customers from Solix.
What benefits are available to an ERP-eligible customer?	An ERP-eligible customer is immediately protected from disconnection for nonpayment (DNP) and eligible for a deposit waiver. <i>Note: all residential and small commercial customers, regardless of ERP status, must be granted a deferred payment plan (DPP) upon request.</i>
Are any non-residential customers ERP-eligible?	No.
Are present LILA customers automatically ERP-eligible?	Yes.
Does a customer have to have satisfactory credit to be ERP-eligible?	No. The only requirement is that the customer enroll with Solix and provide documentation from TWC or appear on the LILA list.
Does the customer have to receive a disconnection for nonpayment (DNP) notice to be ERP-eligible?	No. The only requirement is that the customer enroll with Solix and provide documentation from TWC or appear on the LILA list.

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Question	Answer
Does the customer have to agree to a deferred payment plan (DPP) to be ERP-eligible?	No. The only requirement is that the customer enroll with Solix and provide documentation from TWC or appear on the LILA list.
Does the customer have to call both the REP and Solix to be ERP-eligible?	No. The only requirement is that the customer enroll with Solix and provide documentation from TWC or appear on the LILA list.
Does the person seeking ERP eligibility have to be named on the electric account?	No. The Solix match for ERP eligibility will be on a household basis.
If there is more than one ESI ID tied to an ERP-eligible customer's account, are both premises ERP-eligible?	No. A single premise (ESI ID) is ERP-eligible per customer.
Will customers ever have to re-qualify for ERP-eligibility?	A re-qualification requirement is not contemplated at this time.

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Customer Self-Enrollment

Question	Answer
Who may contact Solix on the customer's behalf?	Any member of the customer's household.
What documents will a self-enrolled (TWC) customer need to provide to Solix to prove they are unemployed?	A confirmation letter from TWC that they have applied for unemployment and been approved. Acceptable documents are the "Statement of Wages and Potential Benefit Amounts" or the "Determination of Payment of Unemployment Benefits". A screenshot of the "Claim and Payment Status" from the customer's online TWC account is also acceptable.
The Order requires a customer to "provide the LILA with an attestation of unemployment". What does "attestation of unemployment" mean?	Attestation means the customer can call Solix to be put on the ERP-eligible list provisionally, then follow up with required documentation within 30 days.
What information will Solix provide the customer regarding the ERP?	Solix will only provide the customer with information on how to enroll in the ERP. Solix will refer the customer to the REP for information regarding ERP benefits.
Can a REP contact Solix to enroll a customer?	No. The customer or member of the customer's household must self-enroll with Solix.
Is there a deadline to enroll in the ERP?	No. Customers may self-enroll in the ERP at any time throughout the duration of the ERP.
How long does it take for a customer to appear on the ERP-eligible list after they call Solix to enroll?	The self-enrollment (TWC) list will be updated and available on a weekly basis. Therefore, as many as 8 days can elapse between self-enrollment and the appearance of the customer on a REP's ERP-eligible list. Customers who are automatically eligible through the LILA list or have recently switched to the REP may take up to 30 days to appear on a REP's ERP-eligible list.
What happens if a customer attempts to self-enroll in the ERP but is determined not to be ERP-eligible?	If Solix determines a customer is ineligible for the ERP, then the customer will be removed from the self-enrollment (TWC) list when it is updated the following week. If the customer provides Solix with an email address, they will receive confirmation by email once Solix confirms ineligibility.

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Question	Answer
How will a customer know if their enrollment was successful?	If the customer provides Solix with an email address, they will receive confirmation by email once Solix confirms eligibility.
If a self-enrolled (TWC) customer stops receiving unemployment for any reason, will the customer be removed from the ERP-eligible list?	No. Once a self-enrolled (TWC) customer is ERP-eligible, they are ERP-eligible for the duration of the ERP. <i>Note: a customer who is ERP-eligible via status as a LILA customer is only qualified for the time period that they appear on the LILA list.</i>
What happens when an ERP-qualified customer switches REPs?	The customer should inform the new REP that they are enrolled in the ERP. The new REP should provide the customer with all ERP-eligible benefits. The customer will match on the new REP's ERP list and no additional customer contact with Solix is required.
What happens when an ERP-eligible customer moves to a new premise or transfers service?	The customer should re-enroll with Solix with their new ESI ID.
Does Solix offer enrollment assistance in Spanish?	Yes.

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Customer Accounts and Payments

Question	Answer
Is an ERP-eligible customer required to make payments on their account?	Yes, a customer should continue to make payments as they are able.
Can an ERP-eligible customer be disconnected for any reason related to nonpayment?	No. However, a premise may still be disconnected for safety reasons or following a move-out.
Is an ERP-eligible customer required to request protection from DNP?	No. For any residential customer, the REP should check to see if the customer is on the ERP-eligible list prior to disconnecting them. If the customer is ERP-eligible, then the REP cannot disconnect the customer and should contact the customer to establish a DPP.
What happens when a customer has been disconnected, but then becomes ERP-eligible?	The order implementing the ERP should be construed in the interest of eligible residential customers at all times.
What happens when a customer is provisionally placed on the ERP-eligible list but later removed?	If the REP chooses to disconnect the customer for nonpayment, the REP must send the customer a DNP notice and allow the customer 10 days to respond to the notice prior to issuing a DNP order.
If a DNP order is sent by the REP in error for an ERP-eligible customer, will that DNP automatically be rejected or cancelled by the TDU?	No. If a REP issues a DNP order for an ERP-eligible customer's premise, the REP should immediately move to reconnect the customer.
Is a REP required to waive a deposit for a new customer who is ERP-eligible?	Yes.
What is the Texas Set SAC04 code and description for the TDU's "COVID-19 Electricity Relief Program" rider?	The SAC04 code is: MSC024 The SAC15 description is: "Electricity Relief Program"

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Question	Answer
Is the TDU's "COVID-19 Electricity Relief Program" rider a non-bypassable charge?	Yes.
Are REPs required to update their Terms of Service, Electricity Facts Label, or Prepaid Disclosure Statement documents to include information about ERP?	No.
Can a REP apply a switch-hold to an ERP-eligible customer's account?	Only if the customer agrees to a DPP and acknowledges a switch-hold may apply.
Is there any difference in implementation of the ERP for prepaid service-customers compared to postpaid service customers?	No.
Where in the Commission's rules are DPPs addressed?	Postpaid service: http://puc.texas.gov/agency/rulesnlaws/subrules/electric/25.480/25.480.pdf Prepaid service: http://puc.texas.gov/agency/rulesnlaws/subrules/electric/25.498/25.498.pdf
How is a DPP for an ERP-eligible customer different from a DPP for a customer that is not ERP-eligible?	There is no difference in the structure of the DPP. However, an ERP-eligible customer may not be disconnected for nonpayment, including failure to pay a DPP installment.

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Solix Identification Process

Question	Answer
Does the REP need to set up an account with Solix?	As of April 3, 2020, all REPs currently serving residential customers are set up and receiving match lists from Solix.
What does a REP need to provide to Solix in order to receive a list of ERP-eligible customers?	REPs are required to submit a monthly file (REP list) with information regarding all of its residential customers to Solix.
How does a REP retrieve its list of ERP-eligible customers?	Each REP will receive a list of its ERP-eligible customer from Solix through the File Transfer Protocol (FTP) site.
How often does Solix update the list of ERP-eligible customers?	Solix will utilize the REP list and perform two separate match processes to determine ERP-eligible customers. Solix will perform a weekly match for customers self-enrolled using TWC documentation. Solix will continue to perform a monthly match for customers on the LILA list. This document refers to the self-enrolled (TWC) list and LILA list collectively as the ERP-eligible list.
Once ERP-eligible, does a customer remain on the list throughout the duration of the ERP?	<p>Yes. A customer will remain ERP-eligible throughout the duration of the ERP, unless:</p> <ul style="list-style-type: none"> • A provisionally ERP-eligible customer does not provide the required TWC documentation to Solix within 30 days; • The customer moves to a new premise and no longer matches at the service address tied to their ESI ID; or • The customer drops off the LILA list. <p>A customer will also be removed from a REP's ERP-eligible list if it is no longer the customer's REP of Record.</p>

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Question	Answer
<p>How will the ERP self-enrollment (TWC) and the LILA lists be distinguished?</p>	<p>All REPs will receive a weekly list of ERP-eligible customers from Solix on the FTP.</p> <p>For REPs receiving access to the list solely through the ERP (do not fund LILA list pursuant to 16 TAC §25.45), Solix will provide a single file with both self-enrolled (TWC) and LILA customers. The LILA customers will be updated once a month.</p> <p>For REPs who previously received the LILA list pursuant to 16 TAC §25.45, the REP will continue to receive its monthly LILA file through the standard process. The self-enrolled customer (TWC) list will be provided weekly as a separate file. A REP is responsible for obtaining both lists to ensure it is protecting all ERP-eligible customers from DNP.</p>

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ERP Financial Assistance Qualification

Question	Answer
Should a REP begin submitting reimbursement claims immediately upon notification a customer is ERP-eligible?	No. The REP should work with the customer and try to establish a DPP.
When can an ERP-eligible customer receive financial assistance from the ERP?	Once an ERP-eligible customer would otherwise be subject to a DNP order, the customer becomes eligible for financial assistance from the ERP. This document refers to those customers as ERP-qualified .
What financial assistance is available to ERP-qualified customers?	An ERP-qualified customer is eligible to receive an energy charge reimbursement of \$0.04/kWh and the suppression of most TDU delivery charges. The customer's REP must establish the TDU delivery charge suppression and request energy charge reimbursement utilizing the MarkeTrak processes established by the TDUs.
If a REP cannot reach an ERP-eligible customer facing a DNP to establish a DPP as contemplated by the order, can the REP still request suppression of delivery charges and reimbursement for energy charges (i.e. is such a customer deemed ERP-qualified to receive financial assistance from the ERP)?	Yes. However, the REP must be prepared to demonstrate that it made multiple meaningful attempts to contact the customer.
At what point should a REP credit an ERP reimbursement to an ERP-qualified customer's account?	The REP should credit the ERP-qualified customer's account upon submitting the energy charge reimbursement request to the TDU. The customer's account should also reflect any suppression of TDU delivery charges. Any ERP-related adjustments should also be reflected on the customer's next bill or Summary of Usage and Payment (SUP).
If \$0.04/kWh does not completely cover the ERP-qualified customer's energy charge, then does the REP pass the remaining charge to the customer?	Yes. Any charges the ERP-qualified customer incurs that are not reimbursed through the ERP may be charged to the customer's account.

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Question	Answer
Is an ERP-qualified customer required to make payments on their account?	Yes. An ERP-qualified customer should continue to make payments as they are able.
For ERP-qualified customers on a bundled rate that includes TDU charges, how should the ERP financial assistance benefit be applied?	The REP will be reimbursed \$0.04/kWh for energy charges. The REP should apply the energy charge reimbursement to the ERP-qualified customer's account. Any TDU delivery charges suppressed by the TDU and therefore not billed to the REP should also be reflected as a credit to the bundled rate.

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TDU Delivery Charge Suppression Process

Question	Answer
When will the TDUs start accepting MarkeTraks for suppression of TDU delivery charges?	REPs can begin submitting MarkeTraks as of April 20, 2020, if the customer's account meets the requirements for reimbursement (i.e. the customer is ERP-qualified to receive the ERP financial assistance benefit).
How should a REP submit ESI IDs for TDU delivery charge suppression?	A REP should follow the process outlined by the TDUs (<i>see TDU-REP Workshop presentation for TDU suppression processes</i>).
When does a REP need to submit a delete MarkeTrak?	The REP should submit a delete if: <ul style="list-style-type: none"> • Solix removes the customer from the REP's eligibility list because the customer fails to provide documentation of unemployment within 30 days; • The customer falls off the LILA auto-enrollment list; or • The REP inadvertently submitted a MarkeTrak seeking to suppress charges for the incorrect ESI ID.
If Solix removes the customer from the ERP-eligible list, will the suppressed TDU delivery charges be cancel/rebilled?	No. The REP should submit a delete MarkeTrak and TDU delivery charges will be applied on subsequent 810_02 invoices.
Does the REP need to take any actions if there is a move-in or move-out at an ESI ID where the TDU delivery charges are suppressed?	No. The TDU will reinstate delivery charges upon receipt of a move-in or move-out transaction at an ERP-qualified premise
What happens when an ERP-qualified customer switches?	If an ERP-qualified customer switches REPs, TDU delivery charges will continue to be suppressed with the new REP of Record.
How will the 810_02 invoice be affected for ERP-qualified customers?	<i>Please refer to the TDU-REP Workshop Presentation and TDU ERP Question & Answers documents for 810_02 impacts by TDU service area.</i>
Will the TDU suppress all charges on the 810_02 invoice for ERP-qualified customers?	The TDUs will suppress all monthly TDU delivery charges except for securitization charges and all discretionary service charges except for tampering or late payment charges (<i>see the TDU REP Workshop presentation for TDU specific charges</i>).

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REP Reimbursement Process

Question	Answer
How can a REP request the reimbursement spreadsheet template?	A REP can request a copy of the spreadsheet from its TDU account manager.
How should a REP submit the reimbursement spreadsheet?	Each REP requesting energy charge reimbursement must send a reimbursement spreadsheet to each TDU from which it is requesting reimbursement on the 15 th of each month (<i>see the TDU-REP Workshop Presentation and TDU ERP Question & Answers documents for specific submission process</i>).
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 valid 810_02 invoice for an ERP-qualified customer as long as the REP has not previously requested reimbursement for the same invoice.
When submitting a reimbursement request must the REP be the current REP of Record?	No. A REP may request reimbursement for energy charges that correlate to any valid 810_02 invoice for an ERP-qualified customer as long as the REP has not previously requested reimbursement for the same invoice.
After the REP has submitted its reimbursement spreadsheet, when will the TDU process the invoice for payment?	TDUs will reimburse REPs via Electronic Funds Transfer (EFT) within 14 days of receipt of the reimbursement spreadsheet via MarkeTrak for all valid ESI IDs. The REP must return documentation to the TDU to set up the EFT and designate a bank account.
How will the TDUs validate the reimbursement spreadsheets?	The TDUs will ensure all information on the spreadsheets is 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 that the REP has not previously claimed reimbursement for the same 810_02 invoice. The TDU will also confirm the total number of a REP's reimbursement requests against the REP's total ERP-eligible customer count.

Appendix

Acronyms	
DNP	Disconnection for Non-Payment
DPP	Deferred Payment Plan
ERP	COVID-19 Electric Relief Program
ESI ID	Electric Service Identifier
ETF	Electronic Funds Transfer
FTP	File Transfer Protocol
LILA	Low Income List Administrator
REP	Retail Electric Provider
SUP	Summary of Usage and Payment
TDU	Transmission Distribution Utility
TWC	Texas Workforce Commission

Definitions	
ERP-eligible customer	A residential customer who is either currently on the LILA list or is unemployed due to the effects of COVID-19 and self-enrolls through TWC documentation with Solix.
ERP-eligible list	A list of all ERP-eligible customers provided to REPs by Solix through the FTP site.
ERP-qualified customer	An ERP-eligible customer who would otherwise be subject to a DNP order and has therefore become qualified for financial assistance from the ERP.
LILA customer	A low-income customer identified by Solix through a monthly automatic identification process in cooperation with the Texas Health and Human Service Commission pursuant to 16 TAC §25.45. LILA customers are automatically ERP-eligible.
LILA list	A list provided monthly to REPs by Solix of its eligible low-income customers pursuant to 16 TAC §25.45.
MarkeTrak	The web-based database application used to track, manage, and store data utilized by TDUs and REPs in the ERCOT competitive retail market. This tool is the supported method to track market

	issue management.
Provisionally ERP-eligible	Describes a customer who has not yet provided Solix documents from TWC that prove they are eligible for unemployment benefits; or A customer who a REP has reason to believe is ERP-eligible, however, the REP has not yet received an updated ERP-eligible list to confirm the customer's eligibility.
REP list	A list of all of a REP's residential customers submitted by the REP to Solix on a monthly basis for the purpose of matching with the LILA and self-enrolled (TWC) lists.
REP of Record	The customer's current REP.
Self-enrolled (TWC) customer	A residential customer who has become unemployed due to the effects of COVID-19 and provides Solix documents from TWC that prove they are eligible for unemployment benefits.
Self-enrolled (TWC) list	List provided weekly to REPs by Solix of the REP's customers who have been identified as ERP-eligible through TWC documentation.
Solix	Pursuant to 16 TAC §25.45, Solix is the third-party vendor contracted by the Commission to administer aspects of the low-income customer identification process established under PURA §17.007. Solix maintains the LILA list and specifies the process for REPs to obtain the list. Solix has also been contracted by the Commission to facilitate the self-enrollment of ERP-eligible customers through TWC documentation.