**From:** Vance, Andrew – Direct Energy
**Sent:** Friday, January 04, 2013 10:45 AM
**To:** naesb
**Subject:** Comment on Retail Customer Authorization Form

Dear Ms. Trum,

Direct Energy Services submits these comments on the NAESB Retail Request for Comments on the Retail Customer Authorization Form.

1. The LOA refers to specific time intervals requested for interval data (15 minutes, 30 minutes, 1 hr, etc).  However, some customers are not aware of what data granularity is available for their individual accounts.  In most circumstances, suppliers are interested in receiving the most detailed data available on the account from the LDC and would select 15 minute intervals.  However, the concern is if a supplier selects 15 minute intervals on the LOA, but the account only captures 30 minute intervals, the LDC may reject the request and not send the data via the HU request due to the interval data mismatch.  We would want to clarify that no matter what interval time is requested, the LDC would send the most granular data available for the account.

2. The LOA requires a maximum 30 day turn-around for the LDC to provide historical usage data.  However, many states require HU data turn-around in a much shorter timeframe (3 days in Texas, etc). In addition, many EDI-enabled LDCs respond within 24 hours to HU requests.  Since pricing some customers can be dynamic and strict enrollment lead-times exist, suppliers & customers prefer receiving the HU as quickly as possible.   There are two options to resolve this situation:

        - 1) Standardize HU request LTs across deregulated states (for instance, 3 days for EDI or 5 days in manual markets)

- 2) Create language similar to “LDC must provide response by either within 30 days or state level mandated HU response lead-time whichever is shorter”

Thank you for the opportunity to submit these comments.

Andy

Andy Vance
*Utility Operations Manager*
**Direct Energy**1001 Liberty Avenue
Pittsburgh, PA 15222
[www.directenergybusiness.com](http://www.directenergybusiness.com)

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