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From: <Brian_McFaden@orcom.com>
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AZ CORP COMMISSION DOCUMENT CONTROL

Arizona Corporation Commission

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Ray, Patrick:

JUN 28 1999

Thank you for entertaining our comments on uniformity in the transactions at the recent hearings. At the request of Commissioner Kunasek, ~~Ray~~ is a synopsis of the points I made at the hearing:

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The commission is to be praised for requiring EDI state-wide for the deregulation data transactions. However, while the marketplace believes the intention of this requirement was to insure uniform, statewide, EDI transactions, we are concerned that this will not happen. We are thankful for the wording in R14-2-1612, section K-4, that states that direct access billing and meter data will be transmitted using uniform, statewide formats, but so far we have only seen utility cooperation in attempting to develop a uniform 867 (meter reading) transaction set. This rule also covers the 810 (billing invoice) and the 650 (meter data) and the utilities have not attempted to create uniform formats for these transactions yet. It is our desire that staff lead the charge to enforce the wording of this rule.

Additionally, there are other transactions outside of the billing and metering function that must also be created in a uniform, statewide format. These include the 814 (enrollment and related customer data transactions), the 820 (remittance of funds), the 997 (functional acknowledgment), the 824 (transaction advise), and other transactions that may be needed in the Arizona marketplace. The market desires specific wording be placed in the final rule-making to address all transactions.

Failure to order the implementation of uniform transactions will lead to the chaos similar to what we all experienced in California. That was never the intent of the Commission!

One concern to the marketplace is the high cost imposed upon us to develop data

transaction systems unique to each utility. Additionally, we know that customers will suffer, not only in having to absorb our added costs, but in frustration, when bills cannot be produced by the market participants when the market opens.

Finally, the commission also needs to consider the need to move the data transport platform from Value Added Networks (VANs) to a uniform process using the Internet. The marketplace stands ready to assist the state in exploring emerging technology that will reduce everyone's cost to transmit data to their trading partners.

If you have any questions, or require additional information, please do not hesitate to call me.

With Highest Regards,

Brian McFaden
Orcom Solutions, Inc.
1221 Auraria Pkwy
Denver, CO 80204
800.338.8233 x5438