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OPEN MEETING ITEM

RE - J3000C - 94-0165
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Enron's Comments on ACC Staff's Recommendations of Final Rules on Electric Competition, Regarding Metering, Billing, DASR, and Other Process Issues

- R14-2-1601 In revising definition 4. "Buy-Through" the word "by" was inadvertently removed from the first line. It should be re-inserted.
- R14-2-1604 New language inserted in Section A. now includes the following; "The effective date of the Direct Access Service Request must be within 180 days of the filing date of the DASR." This now contradicts the language in Section 6.21 of APS' newly approved Schedule #10. Suggest either changing to "60 days" to conform with APS approved language or revising APS Schedule #10 to "180 days" to conform to new Rules language.
- R14-2-1613(K)(1) Language used, "who provides metering or", implies that Meter Service Providers must provide meter reading data in EDI format. Although MSPs may in fact provide emergency meter reads on an exception basis, it is not their duty or responsibility to provide this data to the MRSP via EDI. Suggest striking the words "metering or" from this paragraph if the intent of the paragraph is to cover normal meter reading processes.
- R14-2-1613(K)(8) Suggest adding the words "or their representatives" after "Electric Service Provider" and before "or the customer,". This would be consistent with the wording in paragraphs 9 and 10. There is certainly no logical rationale for excluding the ESPs' representative from owning metering equipment, especially in light of their ability to own instrument transformers as stated in (K)(10).
- R14-2-209(1) As pointed out to Commission Staff previously, this paragraph points specifically to an outdated edition of the ANSI C12.1 Code for Electricity Metering. The fully approved 1995 edition has several substantive improvements that, for the first time, recognize the fundamental improvements offered by modern solid-state metering. Considering the vast majority of meters installed specifically for the competitive provision of electricity will consist of these modern meters, it is unwise to ignore this issue at this time.
- R14-2-210(A)(5)(d) This sentence does not belong in this section. It makes no sense based on the wording of Section 5.
- R14-2-210(E)(3) The word "party" was inadvertently removed following "3rd".

Arizona Corporation Commission

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