

**MPSC Staff Report on Investigation
of Detroit Edison Company Retail Open Access Program
Customer Enrollment and Supplier Support Systems and Processes**

December 2000

Summary and Findings

During October and November, 2000, the Staff of the Michigan Public Service Commission (Staff) conducted an investigation of the enrollment process used by The Detroit Edison Company (Edison) for its Retail Open Access (ROA) program. The purpose of this audit was to review the procedures, policies and methods utilized by Edison to determine if, in Staff's opinion, Edison was effectively and efficiently processing enrollments. Additionally, Staff attempted to discern whether Edison was favoring specific Alternative Electric Suppliers (AES) or customers or customer groups.

The investigation first identified the various steps utilized by Edison in its enrollment process. Staff then selected a structured non-random sample of enrollments to evaluate. Following this evaluation, Staff presented several findings. These findings are:

1. No evidence was found of favoritism to specific AES's, customers or customer groups.
2. Certain customers were able to negotiate special but not anti-competitive treatment in the enrollment process, by being assertive in their approach with Edison.
3. Edison's automated and manual management information systems do not provide sufficiently detailed information to easily track and facilitate the progress of enrollments through the process.
4. Communication between Edison, AES's, aggregators and customers has not clearly provided information about process requirements, timelines and equipment requirements.
5. Edison's enrollment process completes many separate tasks in serial fashion. Efficiencies could be gained through parallel processing.
6. Edison believes its process is only in a startup and transition phase, but it does not appear to be capable of efficient and effective handling of even the modest volume of customers migrating to ROA during the initial phase-in period.
7. At this time, Staff does not believe Edison's enrollment process is prepared to handle full open access, commencing on January 1, 2002.

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1 Introduction & Statement of Purpose

The first few Retail Open Access service customers in the Detroit Edison (“Edison”) service territory started receiving electricity from the competitive suppliers of their choice in early September 2000. That marked the beginning of Retail Open Access (“ROA”) service in Michigan. Service to the first few Edison ROA customers followed soon after the June 2000 passage of Michigan’s *Customer Choice and Electricity Reliability Act* (2000 PA 141 & 142; MCL 460.10 et seq.; MSA 22.13(10) et seq.). It represented a process that began in the early 1990’s and marked the culmination of a series of MPSC orders on electric utility restructuring, dating back to 1996.

Problems and difficulties were encountered as Edison started to utilize systems and procedures it had put into place for communications and information exchange with AES’s and ROA customers. This was especially true for the customer enrollment process.

Reports to MPSC Staff raised questions about Edison’s performance in implementing the ROA program. In September and October 2000, two of the three active Alternative Electric Suppliers (“AES’s”) and some of their prospective ROA customers voiced concerns that the process was not working according to plan and was not meeting the expectations they had been given by Edison.¹ As a result of several communications received from AES’s and prospective ROA customers, Staff undertook an investigation of Edison’s ROA service implementation systems and procedures.

Perhaps Edison was foot dragging, as some of the AES’s and customers interpreted the situation. Or, as Edison responded to Staff’s early inquiries on these issues, perhaps Edison was trying as hard as it could to implement a complicated and difficult program and start up problems were unavoidable. This paper reports on Staff’s investigation of Edison’s customer enrollment process.

The process of implementing ROA service is fairly complicated, so it is not entirely surprising that there have been some difficulties in getting it started. Still, the abilities to rapidly identify problems, resolve and smooth them over and make the process changes necessary to prevent their reoccurrence can be considered hallmarks of successful program implementation.

In its October 24, 2000, Order in Case No. U-11956, approving retail access program implementation costs by Consumers Energy and Detroit Edison, the Commission defined implementation costs as “non-recurring costs that...are necessary to accomplish the changes required by restructuring” (p. 3). The Commission stated:

¹ The third active AES at this time was DTE Energy Marketing, an affiliate of DE. At the time MPSC Staff began its investigation, DTE Energy Marketing (“DTE-EM”) had not reported any concerns to MPSC Staff.

“Expenditures associated with the implementation of the retail open access programs must produce results. Procedures, policies, methods, or electronic data interfaces that prove to be ineffective, inefficient, or unworkable may not entitle the company to recover the costs of those systems.” (pp. 4-5).

This Staff investigation is not a financial audit of expenditures Edison made on ROA implementation. Instead, it is an investigation into the systems and procedures used. Staff is mindful, however, that Edison has already spent several million dollars on the systems and processes that are the subject of this review. The October 24 order (pp. 6-7) notes that Edison reported expenditures of about \$11.6 million through the first quarter of 1999 and projected its total implementation expenditures will exceed \$100 million (pp. 6-7).² As reflected in the Commission’s order, the intent of this MPSC Staff investigation was to shed light on the effectiveness, efficiency, and workability of Edison’s procedures, policies and methods.

In order to evaluate the situation, MPSC Staff completed an investigation of the Edison customer enrollment process. The purposes of Staff’s review were to:

1. Investigate how the process has been working;
2. Identify and describe the problems that have been encountered;
3. Explore the adequacy of Edison’s plans and its implementation of them; and,
4. Recommend policies regarding customer enrollment procedures for implementation in Edison's final Retail Open Access (ROA) tariff, which is now under consideration in Case No. U-12489.³

² The Commission is reviewing applications for the recovery of implementation expenditures for Consumers Energy and Detroit Edison in a series of annual true-up cases, 1998 through 2007. U-11956 was the first Edison true-up case, for 1998 and prior expenditures. In Case No. U-12359, for 1999 expenditures, Edison is seeking recovery of about \$21 million and indicates its total implementation expenses will be about \$120 million.

³ Case No. U-12488 will establish the final Consumers Energy ROA tariff. At the outset, Staff believed that findings and recommendations from this review might also be applicable to the final Consumers Energy ROA tariff and to ROA programs that will be implemented in the future for all other MPSC regulated electric utilities.

2 History of Program

The transition toward retail open access (ROA) in Michigan has been underway for several years. Experimental retail wheeling programs in Michigan were the subject of cases that began in 1992. A Michigan Jobs Commission report to the Governor calling for industry restructuring was delivered in January 1996. The Commission established the basic framework for restructuring in a series of orders dating back to December 1996, and initially scheduled a phase-in of ROA that was slated to start in January 1998, with full open access by January 1, 2002. Various administrative and legal issues delayed implementation and postponed the start-up, but in September 1999 Edison agreed to voluntarily begin the Commission-ordered ROA service and the first round of bidding for the rights to participate in ROA took place that same month. Ultimately, the Customer Choice and Electricity Reliability Act (2000 PA 141) was signed by Governor John Engler, and took effect on June 5, 2000. The new law affirmed the phase-in schedule and the starting date for open access for all Edison customers of January 1, 2002.

Edison began to design and implement its enrollment process, in anticipation of a 1998 start-up date. Eventually, Edison prepared handbooks and provided workshops to explain the procedures to suppliers and customers.⁴ The first workshops were held in August 1999. Five rounds of bidding were completed, to establish rights to transmission capacity for the phase-in period, prior to January 2002. Two rounds of bidding were completed in September and November 1999, and the next three took place in January, March, and November 2000.

Bidding established the rights to begin ROA service as early as fall 1999, but the first customers did not begin to enroll in Edison's system until the late spring and early summer of 2000. The major reason for that delay was that by the time AES's were finally prepared to begin serving ROA customers, no firm transmission capability into Michigan was available to them for reservation in the summer months of 2000. AES's who rely on out of state sources of generation could not be assured they could move power to their Michigan customers in the summer, so most AES's and their customers determined they would wait until after the summer to begin ROA service. Though a few hundred enrollments were submitted as early as April and May 2000, significant numbers were not submitted until July (see Figure 1, p. 12).

Once it became clear that the legislation had passed and transmission capacity would start to be available by the first of September, the active AES's started to enroll customers with the hopes of bringing them into ROA service by the first of September. Thus, July 2000 marked the first

⁴ Early in the genesis of the Edison ROA program, there were some reports of problems and concerns, and even some formal complaints raised about specific requirements of Edison's ROA marketer agreements, but those concerns are not the subject of this report. Many of the sticking points were resolved via settlements and in Commission Orders in Cases Nos. U-12272, U-12323, U-12327, and U-12330. Any remaining concerns about Edison's requirements for AES's and Marketers may be raised in the ongoing ROA tariff case, U-12489.

significant numbers of enrollments for Edison to process, and the first serious test of its enrollment system.

In the process of trying to enroll the first few hundred customers, it became clear that the enrollment process was not working as smoothly as Edison had planned. Customers and AES's brought problems to the attention of MPSC Staff, and Staff undertook the investigation that is the subject of this report.

The most important point to understand from this brief summary of events that led to Staff's investigation is that Edison had been anticipating the start of ROA enrollments for several years by now, and could have been called upon to enroll many more customers even sooner. The startup difficulties experienced to date lead Staff to question the adequacy of Edison's 1998 and 1999 preparations for this process.

3 Overview of Process and Current Status

In order to implement ROA service enrollment, Edison established an interrelated set of information systems and procedures to be followed by AES's, customers, and Edison staff. Edison's intent was first to structure systems to function as an interim solution during the ROA phase-in period, and later to make a smooth transition to systems for what Edison characterizes as the mass market ROA program, starting in January 2002.

Edison's enrollment system tracks information and qualifications for as many as four different entities: (1) ROA capacity owners, (2) AES's, (3) Marketers, and (4) Customers. Table 1 provides a basic description of each entity, and indicates what Edison checks, in order to qualify them for participation in the ROA program.

Table 1: ROA Program Qualifications for Four Different Entities

ENTITY	DESCRIPTION, QUALIFICATIONS, & COMMENTS
Capacity Owner	Holds the right to ROA transmission capacity, as a result of the bid process.
Alternate Electric Supplier (AES)	Holds the appropriate license from the MPSC, under MCL 460.10(a). Has met applicable FERC requirements. Has credit approval with DE to reserve transmission capacity. Has executed a marketer agreement with DE.
Marketer	May be the same entity as the AES. So far, all AES's operating in Michigan are FERC authorized power marketers.
Customer	The word "customer" is used, but it should be noted that for the purposes of the ROA customer enrollment process, the customer is defined as equivalent to a meter. For practical purposes, it is the meter that is enrolled in the ROA program.

This Staff investigation involves the process of enrolling customers in the Edison ROA program. The procedure is summarized in Table 2 (on page 9). Additional details about each step in the process are provided in Chapter 4 of this report.

Table 2: Enrollment Procedure Steps and Examples of Problems Encountered

PROCESS STAGE	CRITERIA TO SATISFY	EXAMPLES OF PROBLEMS ENCOUNTERED
Acknowledged	Enrollment request is received & acknowledged. Edison triggers confirmation process.	Initially, enrollments required exact match of customer name, address, & account number. Many times, customer and AES were unaware exactly what information to present to Edison.
Confirmed	Edison validates account number, meter number, customer name & address and bid. Edison checks account is not past due. If last meter read is estimated, Edison obtains final, actual meter read.	Delays or rejections occurred when: accounts were moved from old billing system; meters were moved and given new addresses & numbers; meters were not read for a long time, resulting in billing disputes and past due amounts; final meter readings had to be scheduled; applications were for incorrect class of ROA service; applications had to be matched up with correct bids.
Site Ready	If the meter is 3-phase, Edison site visit takes place to install a telephone line interface box. The customer is required to provide a telephone line. Edison makes second site visit to install meter.	If the phone line is not working at the time of the second site visit, a third one must be scheduled. AES's complained of long delays between phone line installations and Edison scheduling second site visits. Some phone line installations were not completed according to Edison specifications.
Scheduled	AES schedules power, making a "sink meter" link. AES advises Edison that link has been made. Edison schedules switch date.	AES may delay until they have a large group of customers, to try to coordinate purchase & scheduling of larger blocks of power. AES's want to switch groups of customers all on one day, but Edison system is set to switch each customer only on their own scheduled meter reading date.
In-Service	Enrollment is completed.	AES may not schedule ample power for customers' full needs. Customer may be in service, but billing system issues need resolution before Edison can issue first bill.

Figure 1 (on p. 12) presents summary data for Edison customer enrollments over about a six-month period, May through November 2000. Enrollments held steady at about 200 customers through the end of June, and then increased significantly and steadily during July, August, and September before leveling off at about 1500 to 1600 in October. Edison's procedures were not really tested until early July, when approximately 300 enrollments were received in one week. Then, enrollments increased at a rate of about 200 per week from late July through early September. Rejected and cancelled enrollments are indicated as negative numbers on this graph. Edison quit tracking rejected and cancelled categories in October. The green bars indicate completed enrollments; customers receiving ROA service. The graph shows that substantial delays were encountered between July and September, before any significant numbers of customers started to receive service. Even by the end of November, barely more than half of the enrollments had been completed.

As Figure 1 shows, about 300 enrollments attempted the week of July 11 were rejected by July 17. The general problem encountered was a difficulty in matching up customer names, account numbers and addresses. Edison set up its system to require exact matches of those three data elements, but it turned out to be much more difficult than expected for AES's and customers to obtain and submit this information. Once it became clear that there were significant difficulties in obtaining and submitting this information, Edison relaxed the requirements for this information (see Section 4.3.3.2, p. 20). Most of the enrollments that were initially rejected because of mismatched customer names, account numbers and addresses were subsequently resubmitted and thus reappear later in the data series above the horizontal axis on the graph.

Figure 2 (p. 13) shows the same customer enrollment data, but without data on rejected and cancelled enrollments. Four general trends are observable by studying Figure 2. First, the total number of enrollments has changed very little from late September through November. Nearly 1500 enrollments were already in process by the end of September, and by the end of November the total was only 1700. During that time period, only about 20–25 enrollments were received each week. Second, the number of enrollments in Acknowledged status increased significantly in August and again in late September. Numbers generally shifted from the Acknowledged to Confirmed categories in the following weeks; as expected, but more slowly. Third, the largest groups of customers in process were in the Site Ready status in September and the Confirmed category in October. Fourth, the numbers of customers In-Service have been growing slowly. In general, it took about 8 weeks, from late July until late September, before the enrollment process was eventually completed for any significant number of customers.

Figure 3 (p. 14) shows the percentage of enrollments that were completed and In-Service each week, July 24 through November 27. The data shows it took about 11 weeks to reach the 30 percent mark. Four weeks later, a bit less than half of all the enrollments had been completed. Finally, the 50 percent mark was barely exceeded in late November.

Figure 4 (p. 14) shows data on the planned and actual time it took, in days, for the enrollments in Staff's sample to complete the various enrollment process stages. The "planned" time frames generally reflect Edison's currently established goals. Details for planned times vary depending on

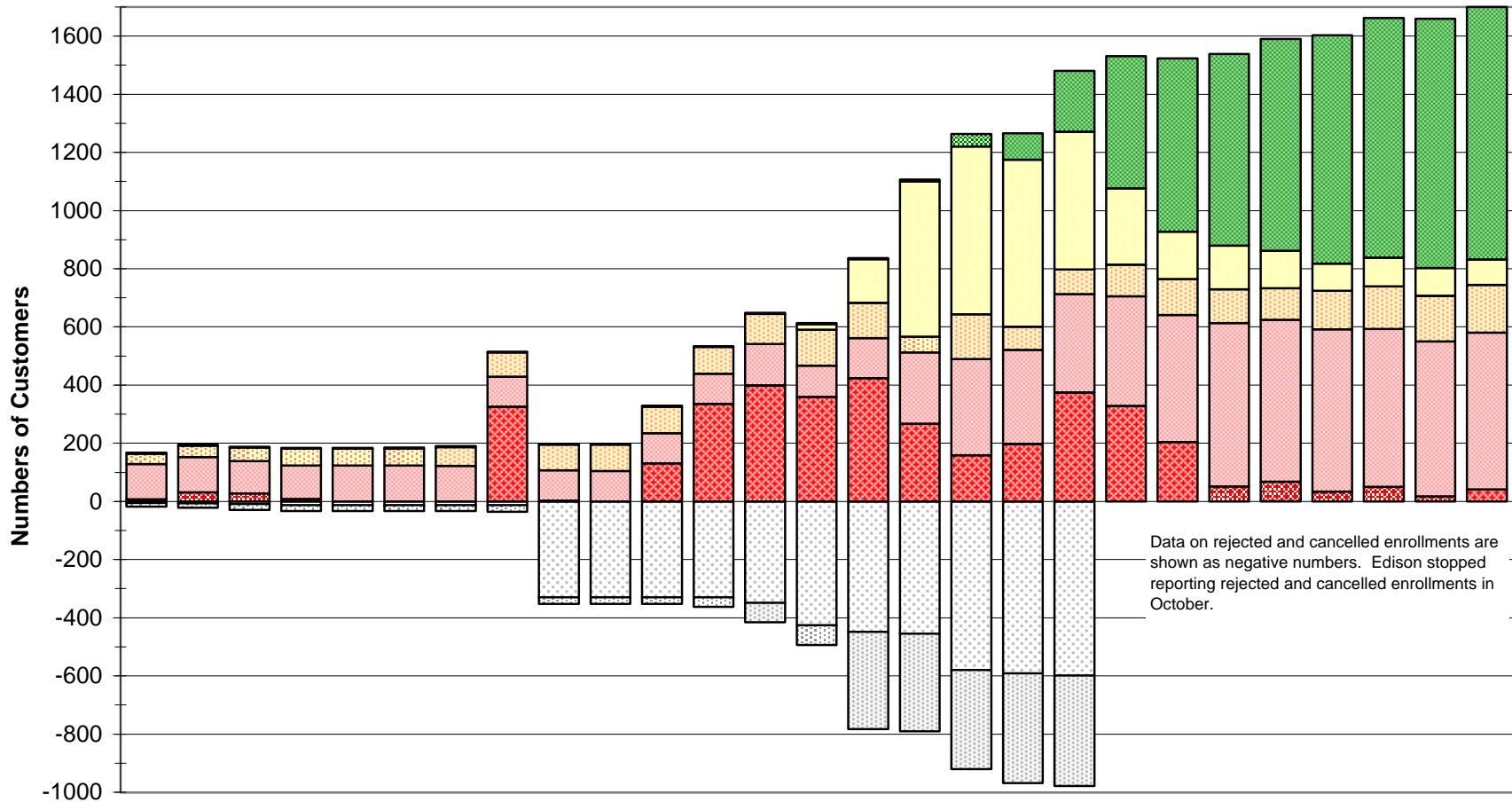
specific circumstances of each customer enrollment, and those differences are discussed in Sections 4.3 through 4.6 (pp. 18–28) of this report.

Looking at Figure 4, it is clear that the only major discrepancy between Edison’s planned time frames and actual averages has been in the length of time it has taken for customers to move from “Scheduled” to “In-Service” status. That appears to reflect both Edison’s policy to synchronize In-Service dates with preexisting customer billing cycles and AES desires to bring customers into service in larger groups. These issues are discussed in Section 4.6.1 (p. 28).

In spite of fairly minor differences in average times for each stage, however, the total time average for In-Service customers in Staff’s sample was just about double what Edison planned. Edison indicated the process would take about 45 to 70 days but, in practice, for Staff’s sample the average was 118 days. The large difference between each category average and the total indicates that many of the In-Service enrollments had been held up in one or more of the categories for a significant time.

The maximum times for each category are shown in Figure 4. The median processing time was almost exactly 100 days, and almost 1/3 of Staff’s sample took more than six months. These data are also depicted in Figure 9 (p. 31), for customers in Staff’s sample that were already in service. Figure 10 (p. 32) shows similar data for customers in Staff’s sample where the enrollment process was not yet completed. Of that group, close to half remained in process after more than 60 days.

Figure 1: ROA Customer Enrollment Status by Week, May 15 through November 27, 2000

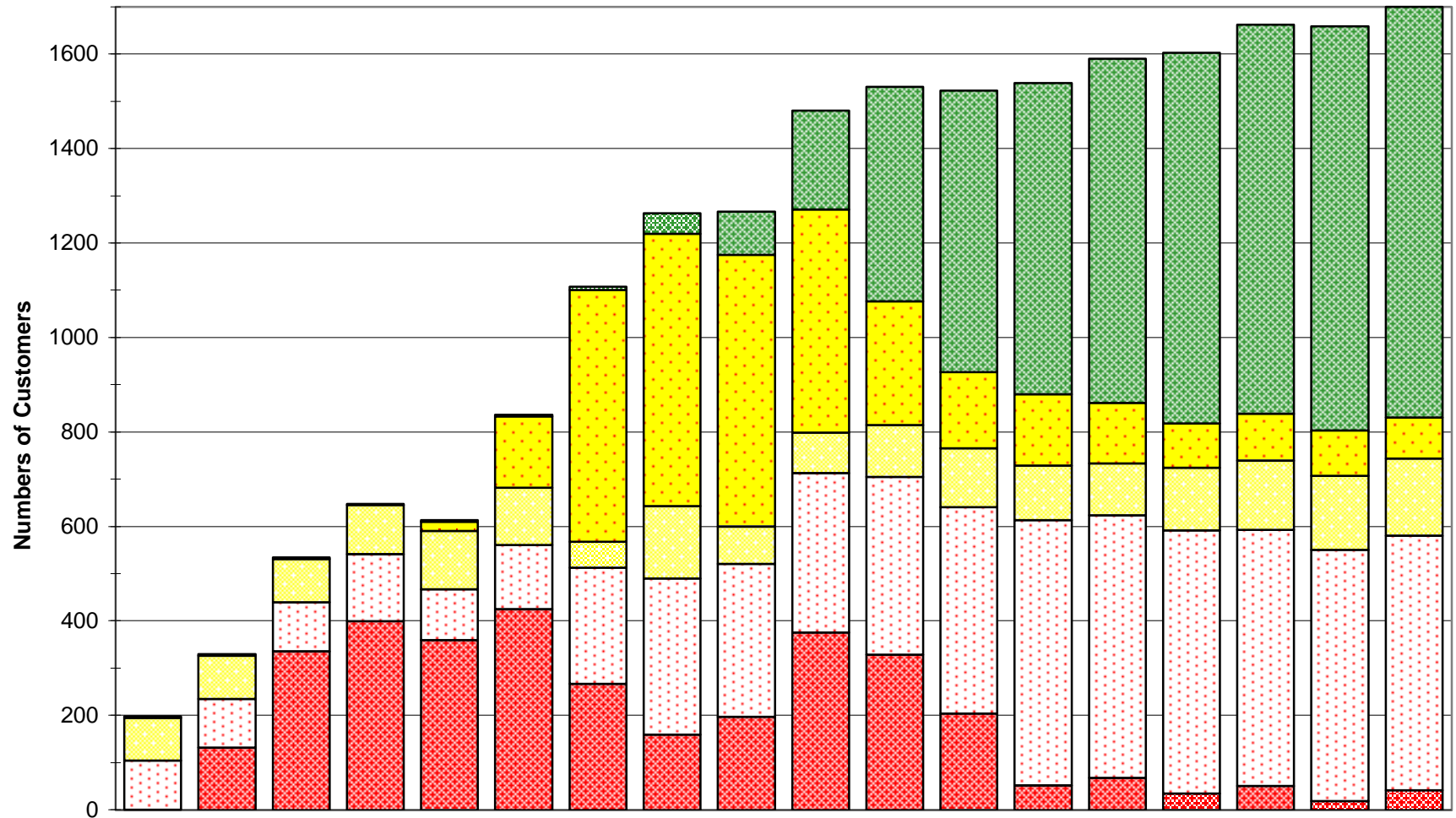


Data on rejected and cancelled enrollments are shown as negative numbers. Edison stopped reporting rejected and cancelled enrollments in October.

	5/15	5/22	5/30	6/6	6/12	6/19	6/26	7/11	7/17	7/24	8/1	8/7	8/14	8/21	8/29	9/5	9/13	9/20	9/27	10/6	10/12	10/19	10/26	11/03	11/10	11/17	11/27
In Service	3	3	3	3	3	3	3	3	3	3	3	3	3	3	3	6	43	91	209	455	596	659	728	785	824	856	869
Scheduled	0	0	0	0	0	0	0	0	0	0	0	0	0	20	151	534	577	575	473	262	162	151	129	94	99	96	87
Site Ready	35	39	47	57	57	59	65	83	88	91	91	92	104	123	121	55	153	79	85	109	124	116	109	132	146	157	164
Confirmed	122	122	110	115	124	123	122	104	105	104	104	104	142	108	137	245	331	324	338	377	437	562	556	558	543	532	539
Acknowledged	7	31	28	9	0	0	0	325	2	0	131	335	399	359	424	267	159	197	375	328	204	51	68	34	50	18	41
Cancelled	-13	-16	-20	-20	-20	-20	-20	-23	-23	-23	-23	-33	-67	-68	-334	-336	-340	-378	-381								
Rejected	-5	-6	-9	-13	-13	-13	-13	-13	-330	-330	-330	-330	-349	-426	-449	-455	-580	-591	-598								

Data on rejected and cancelled enrollments no longer reported.

Figure 2: Enrollment Status, July 24 through November 27, Not Counting Rejections Cancellations



	7/24	8/1	8/7	8/14	8/21	8/29	9/5	9/13	9/20	9/27	10/6	10/12	10/19	10/26	11/03	11/10	11/17	11/27
In Service	3	3	3	3	3	3	6	43	91	209	455	596	659	728	785	824	856	869
Scheduled	0	0	0	0	20	151	534	577	575	473	262	162	151	129	94	99	96	87
Site Ready	91	91	92	104	123	121	55	153	79	85	109	124	116	109	132	146	157	164
Confirmed	104	104	104	142	108	137	245	331	324	338	377	437	562	556	558	543	532	539
Acknowledged	0	131	335	399	359	424	267	159	197	375	328	204	51	68	34	50	18	41

Figure 3: Percentage of Enrollments Completed by Week

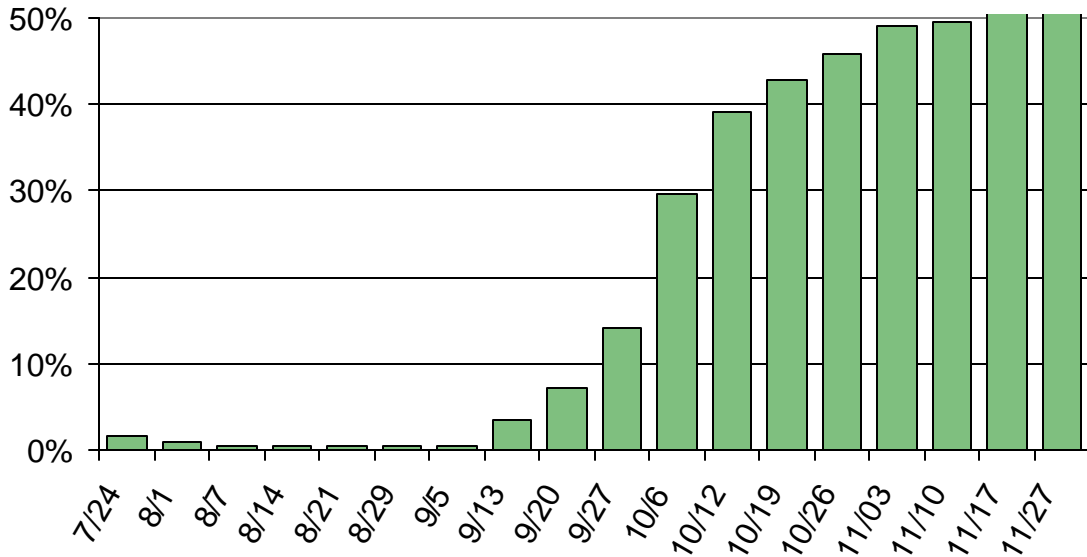
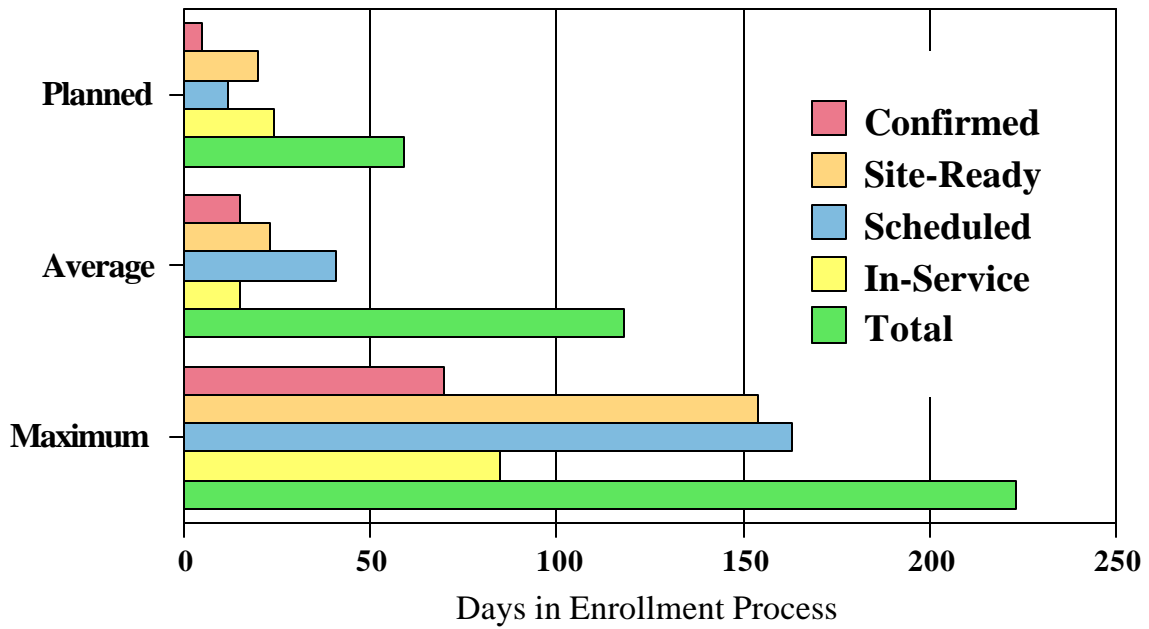


Figure 4: Days to Complete Stages in Enrollment Process for In-Service Sample



4 Detailed Description of Process & Problems Encountered

Section 4 includes detailed descriptions of the five major stages in Edison's enrollment process. Data is reported for all the enrollments Edison is processing and more specifically for a sample of enrollments that Staff studied in detail. Section 4 lists enrollment requirements and problems encountered at each stage, drawing on information received via Staff's correspondence with customers, correspondence and interviews with AES's, and interviews with Edison staff.

4.1 Sample of Enrollments for In-Depth Review

Edison provided Staff with a full list of enrollments, and Staff used an informal stratified sampling procedure to identify cases for detailed review. Table 3 (p. 16) summarizes criteria Staff used to select the sample. Where possible, Staff's sample included enrollments for each AES, in each of the five major status categories, plus some rejected enrollments. Also, Staff's sample included various size customers and each of the three ROA classes: (1) residential, (2) residential and small secondary, and (3) primary.⁵

Finally, where AES's enrolled large, aggregated groups of customers, Staff's sample included representatives of each one. For examples, one group was a single corporate account that included a few hundred small customers, others were load-aggregation cooperatives, and another was a statewide retail chain.

Once Staff had identified specific cases for its sample, Staff asked Detroit Edison to prepare a summary report on those enrollments. Edison account representatives gathered the data and provided it to Staff.

There was no automatic way for Edison to gather and report this data to Staff. Edison's computer systems were not prepared to provide status reports in adequate detail for Staff's purposes. Edison assigned specific account representatives for each AES, to manually retrieve the data needed for this analysis. Each Edison account rep developed a spreadsheet of information for Staff. All three spreadsheets were different. MPSC Staff compiled data from the three spreadsheets into one for the analysis that is reported here.

⁵ Almost no residential customers have been enrolled, to date, but Staff's sample was adjusted to make sure it included representative numbers of both small secondary and large primary customers.

Table 3: Criteria for Initial Sample

Criterion	Data for Population & Sample (as of Mid-Oct 2000)		
	Company	Population	Sample
Three Active Suppliers	DTE EM	361	33 (9.1%)
	Nordic	1050	27 (2.6%)
	Quest	173	15 (8.7%) ⁶
Five Stages in Enrollment Process	Acknowledged		
	DTE EM	41	7
	Nordic	25	5
	Quest	26	5
	Confirmed		
	DTE EM	161	8
	Nordic	305	7
	Quest	96	7
	Site Ready		
	DTE EM	64	4
	Nordic	1	2
	Quest	51	3
	Scheduled		
	DTE EM	11	5
	Nordic	138	7
	Quest	0	0
	In Service		
	DTE EM	81	9
Nordic	581	6	
Quest	0	0	

⁶ None of the initial sample of 15 Quest enrollments had been rejected, so Staff added three more rejected Quest enrollments for analysis.

4.2 Initiating the Enrollment Process

4.2.1 Description & Requirements

The enrollment process begins when an AES submits a customer enrollment form to Edison by one of two electronic methods. One method uses enrollment forms on Edison's supplier Web site. The other is by electronic data interchange (EDI). To participate in ROA, all AES's must have DE-approved EDI capability. When the enrollment system was designed, Edison expected AES's would use its EDI system to submit enrollments in large batches. The Web interface was intended for individual enrollments or just a few at a time.

Enrollment forms include several fields that must be completed in order to avoid rejection. Required fields are: the marketer's identification; customer account number and name; selection of optional back-up service, if applicable; billing option; meter number; and bid identification including the bid round, capacity owner, price, number and class.

Upon receipt of the enrollment form, Edison date and time stamps the form and assigns an enrollment identifier. The expectation was for Edison to process all enrollment forms no later than the end of the next business day. To proceed to "Acknowledged" status, all required fields must be filled in with data that passes simple validity checks.

At this stage, Edison sends an electronic receipt to the AES indicating one of three conditions: (1) one or more required fields is incomplete, and therefore the enrollment is rejected; (2) one or more fields contains invalid data, and therefore the enrollment is rejected; or (3) all required fields are complete with information in the correct format and the enrollment is placed in Acknowledged status. Reaching the Acknowledged stage simply indicates the enrollment form is received and has passed preliminary validation.

4.2.2 Problems Encountered

4.2.1.1 Web Site Not Always Available or Operating Too Slow

One AES reported times when the Web site was down and they could not submit enrollments. DE tried to notify AES's when the Web site would be closed down for planned maintenance, by placing an announcement on the Web site in advance. Also, it was reported that Edison's Web site gets bogged down when more than a few users access it at once. Edison indicated its Web capacity was designed to handle several simultaneous users, but plans did not account for Edison's internal use of the system. It appears that Edison use of the system is substantial. Web capacity may have to be increased significantly for the Web-based enrollment system to serve large numbers of AES's and customers.

4.2.1.2 EDI System

AES's reported to Staff that Edison's EDI system was not fully functional until August 2000.

4.3 Acknowledged Status

4.3.1 Description & Requirements

Once it has been determined that an enrollment request contains all the requisite data, it moves to this first of five stages in the enrollment process. This stage involves confirming the meter number, account number and customer name. Edison also checks to make sure the customer does not have a past-due balance. Customers with past-due balances are not eligible to begin taking ROA service until all past-due amounts have been paid. At this stage in the process Edison verifies the enrolled capacity matches a specific winning bid from the phase-in bid process.

Before an enrollment request can be moved to the next stage, called “Confirmed,” Edison verifies whether the customer identification is accurate and the customer account is properly entered into the company’s billing system.

Edison’s concurrent use of three different computerized billing systems resulted in some difficulties with customer migration to the ROA program. Table 4 (p. 19) shows basic information about the three different customer account and billing systems Edison has been using during the transition to ROA.

Edison’s billing system prior to ROA, its so-called “legacy system,” is Customer Information System (CIS). In preparation for ROA, in 1998 Edison began to develop and implement a new computerized information and billing system.

The billing system Edison is currently using for ROA customers is Key Customer System (KCS). Edison has used KCS for about seven years for its large commercial and industrial customers. Ultimately, it is intended only for those classes of customers. During the phase-in or transition period, however, Edison uses KCS for all ROA customers, while work is completed on a third, new system, Customer Service & Billing (CSB). CSB is to be capable of handling all ROA billings by January 2002.

When AES’s began to enroll customers, CSB was already being used in the Thumb Area and Macomb County. By the end of November 2000, Edison completely phased-out CIS and converted all customer accounts to CSB. In the early stages of ROA enrollments, however, customers whose account information was in CIS could not be switched to ROA until their account information was transferred to KCS. Edison’s procedure in this event was to make a final meter reading on CIS and then transfer the account to KCS.

When it first started to enroll customers, Edison did not have a mechanism in its management information system to identify the reasons why enrollments remained in the Acknowledged stage. After it became clear that some enrollments were getting stuck in the Acknowledged stage, Edison added and began reporting codes for “Valid” and “No Hold”.

Table 4: Edison’s Three Different Customer Information and Billing Systems

SYSTEM NAME	DESCRIPTION
CIS	“Legacy” system. Customers whose account information existed in CIS could not start ROA service until their account was transferred over into KCS. To make that change, Edison required manual account validation and a final, actual meter reading.
CSB	New Customer Service and Billing system. Customers whose accounts were already entered into CSB could switch immediately to ROA, after automated account validation.
KCS	Currently used for large primary customers only. This system was chosen to be the billing engine for all ROA customers until CSB could be upgraded. Customers whose accounts were already entered into KCS system could switch immediately to ROA.

This practice essentially split the Acknowledged status into two different procedures. A manual validation process was used for customers whose account information resided in CIS. Edison validated their account and meter numbers, verified that payments were current and checked to make sure the last meter reading was not estimated.

“Valid” status meant the enrollment was for an account residing in KCS or CSB. In those cases, the validation process was automated. For large customers that already had appropriate metering and telecommunications equipment, the final meter reading could be done any day with the rest of the acknowledgement process completed within a few business days.

“No Hold” status meant the manual validation process was completed, and the account was being converted to KCS, prior to moving to the Confirmed status. Once a customer’s account information had been validated, Edison expected it would take anywhere from 5 to 30 days to complete the move to KCS, depending on the customer’s regular meter reading and billing cycle.

4.3.2 Data from Enrollments and Sample

All 75 enrollments in the sample were processed within about a 24-hour period. They were acknowledged on the same day they were received or the following business day, except for four that were rejected at this stage. One was rejected because there was insufficient capacity remaining on the associated bid. One was for a past due balance. Another occurred because the customer had only estimated meter readings for about 7 months. Finally, a customer was rejected because the enrollment was submitted with a letter “O” in the account number, where a numeral “0” should

have been. Subsequently, re-enrollments for two of these same customers were rejected when a second reason for their rejection was discovered.

Six cases in the sample had not progressed from the Acknowledged status at the time of the review. Those cases had been in Acknowledged status for an average of 59 days, with a range from 30 to 79 days.

4.3.3 Problems Encountered

4.3.3.1 Communications Regarding Rejections

A problem reported by an AES is that the most common reason Edison gives for rejecting enrollments is “Other”. For each rejection notice coded “Other,” the AES said it must contact Edison to determine the reason.

4.3.3.2 Mismatches of Customer Identification Information

Many rejections occur because customers and AES’s have difficulties finding and reporting the exact customer name, address, and account number. In most cases this required information appears on the customer’s most recent bill, but it is on the portion the customer sends to Edison with payment. Thus, the information needed to enroll may not be readily available.

After it became apparent that there were frequent problems with these data resulting in rejections, Edison relaxed its requirements. Instead of requiring a complete, exact match, Edison accepted some variation in names and addresses as long as the given account number matched. That helped reduce rejections, but did not eliminate the problem. Edison believed the initial policy would prevent slamming.⁷ Public Act 141 of 2000, with anti-slamming provisions and penalties in Sections 10(a)3 and 10(c)2–3, alleviated this concern.

Some rejections apparently occurred because Edison was in the process of switching customers from one billing system to another. Edison had assigned a new account number in CSB, but the customer was not yet aware of the new number. Rejections also occurred due to address mismatches because an electric meter had been moved or Edison had assigned a new address and number, even though a meter had not been moved. A new address and number was assigned, but the customer billing data had not been updated to reflect that change. A customer could submit basic information about its account obtained directly from the most recent bill, only to have information mismatches appear due to no fault of the customer.

4.3.3.3 Unwarranted Rejections for Past Due Bills

Rejections have occurred because customers were identified as having past due balances. One AES reported to Staff that in some cases this resulted because Edison had estimated meter readings

⁷ Slamming is the practice of switching a consumer’s utility service without the customer’s permission.

for as many as seven consecutive months and the customers withheld payment pending an actual meter read.

4.3.3.4 Accounts in “Wrong” Billing System

Edison had designed its enrollment system to serve customers whose account information resided in KCS. That was based on the expectation that large customers would be the first to participate in ROA Program, with those accounts already residing in KCS. Edison believed it could develop and implement CSB in time to enroll large numbers of smaller customers.

What actually happened was quite different from Edison’s expectation. Many of Edison’s largest customers were already being served on special contracts or similar low rates compared to current market prices, resulting in very few of the larger customers opting for ROA. In the early stages of ROA, aggregating large numbers of smaller customers appears to have been the favored approach to participation in the program.

The rather large influx of smaller customers meant that Edison needed to process more enrollments than expected for customer accounts that resided in CIS. This processing necessitated a great deal of manual intervention in the validation process. Edison had indicated to AES’s on its supplier Web site that these manual account validations and conversions would take 5 days. In practice validations and conversions were taking 15 days or more. Further delays occurred due to an Edison policy not to convert accounts from CIS to KCS within 3 days before or after the scheduled meter read date.

4.3.3.5 Invalid Bid Information

In a few instances, enrollments were rejected for reasons related to capacity entitlements. One type occurred when the customer and bid class did not match. This happened because customers were not always aware of the class of service they receive. This problem was also identified in some cases when Edison validated meters (see Section 4.4.3.3, p. 25).

Another type of rejection occurred if a bid-holder attempted to activate a lower-priced bid prior to a higher-priced bid. In a March 14, 2000, Order in Case No. U-11290 (p. 4), the Commission determined that a holder of capacity through multiple bids must proceed from their highest priced bid to the lowest, as they begin to enroll and serve customers. Staff identified one circumstance where an enrollment was delayed because the enrollment was submitted with a bid number of a lower bid in a multiple bid situation. As it turned out, the capacity holder sold higher priced bids to an associate in order to activate the lower priced bid, but the capacity transfer had not been recorded in Edison’s information system at the time the enrollment was received. Thus, the enrollment turned out to be legitimate but was not immediately acknowledged as such by Edison. An aggregator had identified a method to “game” the system. First, it deactivated higher priced bids through a bid capacity sale to an associate. Then, as it utilized lower priced bid capacity it “reactivated” higher bids by repurchasing them.

A third type of problem occurred if Edison determined that the bid capacity was not sufficient to serve the matching enrollments. At least in some instances, this problem occurred because of long lead times involved in the activities preceding enrollment. Customers and AES's determined capacity needs perhaps several months prior to when they placed bids, were awarded capacity and then began the enrollment process. For example, phase-one bids were submitted in September 1999 and matching enrollments might not have been submitted until a full year later. In the meantime, Edison reflected any customer's higher peak demand in their required ROA Distribution Contract Capacity.⁸

⁸ The Commission determined in its March 8, 1999 Order in Case No. U-11452 that ROA Distribution Contract Capacity for existing Edison customers would be "set at their highest 30-minute integrated demand created during the previous 12 billing months...[and] not decrease...unless there is a specific permanent reduction in connected load" (see Edison Retail Access Service Tariff, sections 6.2 and 6.3).

4.4 Confirmed Status

4.4.1 Description & Requirements

When all required validation checks in the Acknowledged stage have been satisfactorily completed and the account has been converted to KCS the status changes to Confirmed. In the Confirmed stage, the customer site is checked to verify the necessary metering and telecommunications systems are in place. Confirmed status triggers an order for a site visit to determine metering requirements. The field work consists of three stages: (1) the initial “pre-flight visit” by Edison to check meter and phone line status; (2) phone line installation, if needed, which is the customer’s responsibility; and (3) a second site visit by Edison to install the meter and confirm phone line operation. Also in the Confirmed stage, Edison completes service requests to verify the match-up of the transmission point of delivery (pod), sink code in the OASIS⁹ system, and meter. Once these steps are satisfactorily completed, the enrollment proceeds to “Site Ready” status.

4.4.2 Data from Sample

Of the 75 customers in the reviewed sample, 68 had progressed at least to Confirmed status. Five of the 68 did not have data available to indicate the time spent in Confirmed status. Three of those five moved into Site Ready status immediately, once it was verified that they were single-phase meter customers. The other two had data reported for subsequent steps, but apparently Edison was unable to determine when their status changed from Confirmed to Site Ready.

Of the remaining 63 customers that had progressed at least through Confirmed status, Figure 5 (p. 24) shows the time to be confirmed and move on to the next step. Nineteen of the sample moved in just one day. Eleven more moved in 2 to 10 days. Generally, the fast processing times occurred when meters did not need to be changed and phone lines, if needed, were already installed by the initial Edison site visit. Fourteen moved in 11 to 20 days. Ten moved in 21 to 30 days. Eight took 31 to 60 days to be confirmed, and one took 70 days.

4.4.3 Problems Encountered

4.4.3.1 Access to Meters

Some customers were not aware of the enrollment process and the process’ requirements for site visits. When Edison arrived on site, some customers were not even aware that Edison was coming. On more than one occasion Edison was turned away by occupants or could not obtain access to meters because the customers’ appropriate facilities staff were not present.

⁹ OASIS (Open Access Same-Time Information System) is an electronic communications system for transmission access data. Transmission owners post data on OASIS about their available transmission capacity (ATC), pricing, etc. Existing and potential wholesale customers can access OASIS to view the data and place orders to reserve ATC.

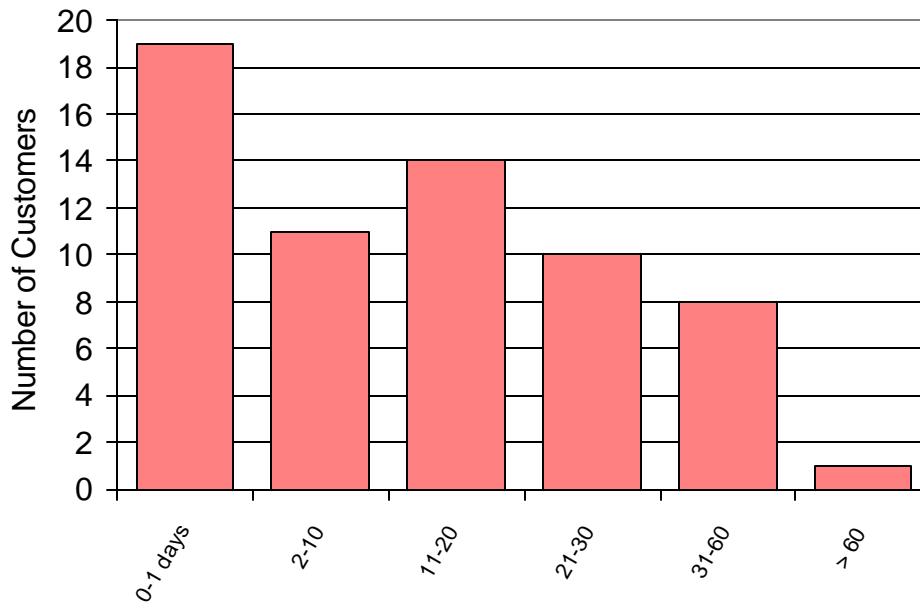
At least some of these cases resulted from communications failures between AES's and customers or aggregators and customers. For example, there were some cases where customers had not received any notification from their aggregators or AES's that their facilities had been selected to participate in ROA, and Edison was turned away when it showed up unannounced. On the other hand, Edison must assume some responsibility for scheduling site visits at times when there will be access to meter facilities.

4.4.3.2 Telephone Lines

Another reason for delays has been scheduling telephone line installations. Ameritech was responsible for significant delays during this time frame.¹⁰ Some customers resorted to hiring independent telephone technicians to complete required telephone wiring, but when new telephone lines were required, they either had to rely on Ameritech or substitute cellular or other wireless service. Some AES's started to use wireless options, at least temporarily, to complete enrollments.

Another problem was telephone line installations that did not meet all of Edison's requirements.

Figure 5: Days to Complete Confirmed Status for Customers in Review Sample



¹⁰ The Commission issued press releases on September 7 and September 29, 2000, regarding ongoing problems with Ameritech service quality, and opened contested case hearings in Cases Nos. U-12598 and U-12599 (see <http://cis.state.mi.us/mpsc/orders/press>).

4.4.3.3 Incorrect Meter Type (Single or 3-Phase)

In at least a half dozen of the enrollments in Staff's sample, there was confusion about what type of meter was present at a particular customer location. In some cases, AES's believed a 3-phase meter was present when it was single-phase, or vice versa. That lack of accurate information can upset the enrollment process because it may affect the class of service and whether a telephone line is necessary. Also, in some instances customers had more than one meter but the AES was aware of only one.

4.5 Site Ready

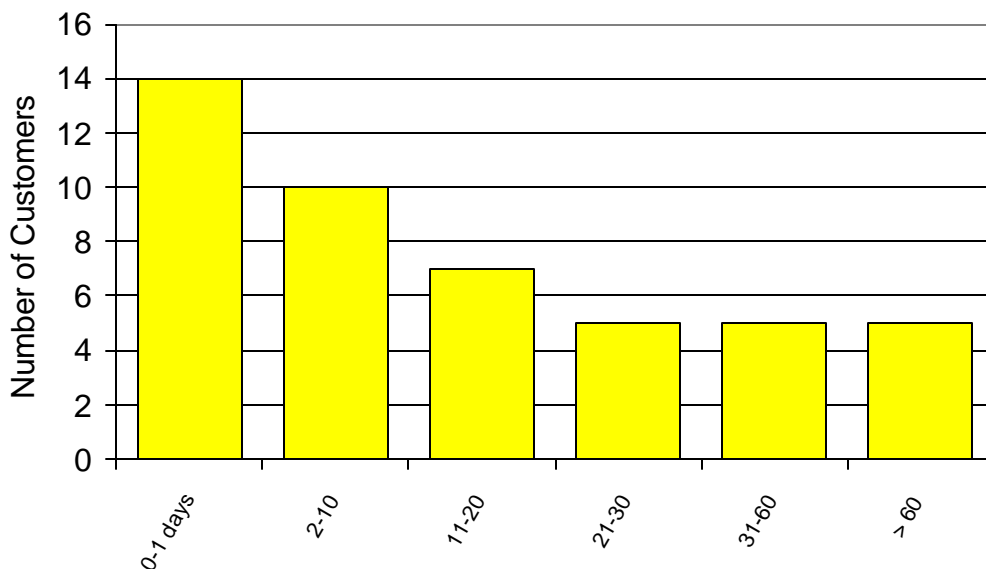
4.5.1 Description & Requirements

Once the enrollment has been confirmed and placed in Site Ready status, progress depends on AES actions. In order to proceed from Site Ready to Scheduled status, the AES must schedule power supply for the customer through Edison by completing a sink meter link. The “sink” is the load where electricity is used. The sink meter link is accomplished by the AES entering data into the OASIS system, indicating the source of power that will serve the customer and by meter number the location of the customer to be served. Once the AES reports the sink meter link, Edison must verify its billing system is correctly monitoring the meter and the account is fully prepared to be switched to ROA. Edison expects to accomplish that verification within 2 business days of notification of the sink meter link. No problems have been reported in this step of the process. It appears that delays in this stage are the result of conscious decisions on the part of AES’s not to complete the required steps faster. Delays, therefore, do not appear to be directly related to Edison’s performance in implementing this stage of the customer enrollment process.

4.5.2 Data

Fifty of the sample enrollments had progressed at least as far as Site Ready status. As shown in Figure 6, many of the customers in the sample moved from Site Ready to Scheduled status in the matter of just a few days, but some remained in Site Ready status for 30 days or longer.

Figure 6: Days to Complete Site Ready Status for Customers in Review Sample



4.5.3 Problems Encountered

Staff is not aware of any problems with the sink meter link process, per se. Delays in this stage appear to result from AES or customer decisions not to move forward with the final steps in the process. The reasons reported to Staff are only indirectly related to Edison's customer enrollment process. Generally, the longer the enrollment process takes, the greater the chance for customers to have second thoughts about ROA.

4.5.3.1 Lack of Available Transmission Capacity (ATC)

Another problem in the start-up of Edison's ROA service is the lack of firm ATC for reservation in the summer months. This appears to be the paramount reason for the lack of significant enrollment activity prior to September 2000. This constraint continues to hamper customer enrollments. AES's and customers may be either postponing enrollment entirely or getting to this Site Ready stage in the process then stopping.

4.6 Scheduled

4.6.1 Description, Requirements and Problems Identified

At this stage of the process, Edison schedules a final meter reading for fully bundled service and a switch date to ROA. Edison's practice has been to schedule switch dates at least 10 business days after the final meter reading.¹¹ Staff notes that Edison does provide AES's with the means to identify each customer's billing cycle. AES's can use that information to correctly anticipate the scheduled switch date. The 10-day delay provides time for Edison to notify customers of the impending switch and give customers an opportunity to rescind the supplier change. This approach can add from 15 to 45 days to the enrollment process, depending on the customer's scheduled meter reading and billing cycle.¹² The AES is notified electronically that all conditions for a switch in service have been validated, and the customer is also notified by mail.

This Edison policy may cause AES problems in two instances. First, if an AES schedules and pays for reservations for generation and transmission capability and cannot use them because the customer has not been switched, the AES's financial risk may be significant. In addition, AES's would like to reschedule billing cycles for ROA customers, to permit serving customer groups of their own choosing on dates that they, not Edison, select. AES's claim this flexibility will allow them to operate more efficiently, by reserving and filling up larger blocks of power.

Second, AES's want to avoid another significant delay to getting customers switched over to ROA. Since this process can add another 15-45 days to an already lengthy process, it may result in another significant obstacle to customer participation.

Staff understands that ROA 3-phase meters offer remote readings at any time via the telephone line connected to the meter. Thus, for all ROA customers with 3-phase meters, Staff believes the final meter reading and switches can be completed any time during the billing cycle. In fact, Staff was informed by an AES that Edison has done this for one group of customers, following special arrangements. The customer's corporate headquarters provided Edison with a letter waiving their rights to the 10-day rescission period and Edison rescheduled all of that customer's participating facilities into a single billing cycle.

Single-phase meters cannot be read in this manner. Thus, it will prove more difficult for Edison to allow customers and AES's optional meter reading and switch dates. Staff does expect, however, that some accommodations may be forthcoming to make this a practical option.

¹¹ The final meter reading is typically scheduled to coincide with Edison's regularly scheduled meter reading date for each customer.

¹² In comparison, Consumers Energy's enrollment process provides for customer notice and a 15-day rescission period, but Consumers will schedule a final meter reading and account switch to ROA at any time during the customer's billing cycle.

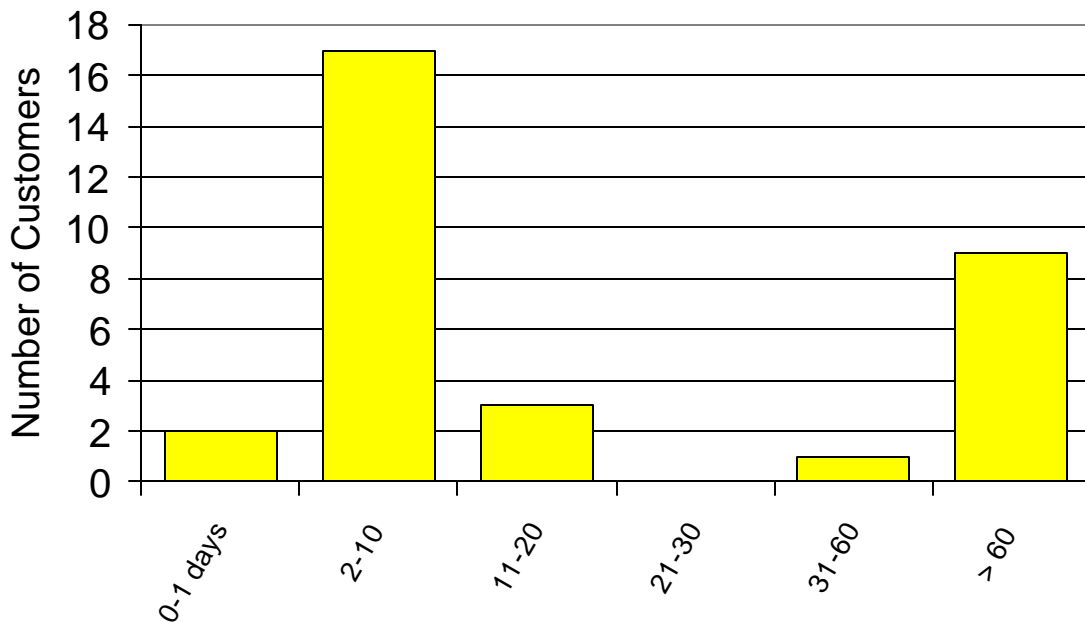
One AES reported a hold-up at this stage for franchise approval from some local units of government. Since the issue of franchise approval is not a part of the enrollment process, Staff believes it would be inappropriate to attribute any enrollment process deficiencies to the franchising process.

A final reason for delay in the Site Ready or Scheduled stages is that some customers have been reluctant to consummate the move to ROA service. Apparently, some customers are concerned that higher than anticipated prices or a lack of available firm transmission service could place them at more risk than they would experience as a customer of Edison's bundled service. This problem is not a reflection of the efficiency of Edison's enrollment procedures, but it may certainly impact the time it takes for some customers to complete the process.

4.6.2 Data

As shown in Figure 7, the Scheduled step was frequently completed in 10 days or less for the sample of enrollments Staff reviewed. About 25% took more than 60 days for this step to be completed.

Figure 7: Days to Complete Scheduled Status for Customers in Review Sample



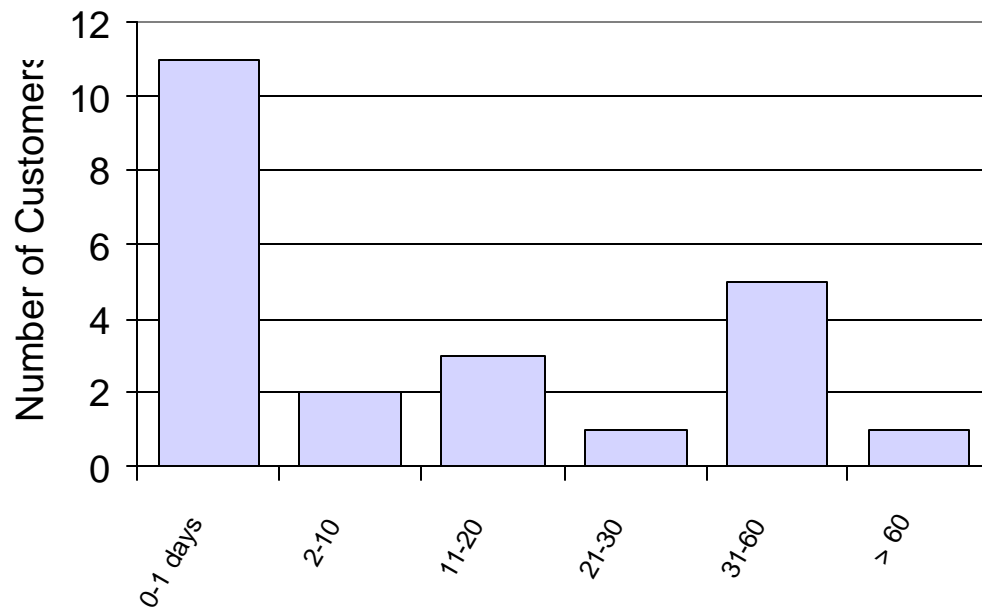
4.7 In Service

4.7.1 Description & Requirements

Edison changes the status of an account from full-service to ROA, on the designated (or scheduled) switch date. The change to In Service status completes the enrollment process. Staff is not aware of any additional problems occurring in this stage of the enrollment process.

4.7.2 Data

Figure 8: Days to Complete In-Service Status for Customers in Review Sample



4.8 Enrollment Process Summary

A large number of small customers with single-phase meters that were already in KCS were processed start to finish in 20-40 days. On the other hand, the process can take a few months – if all goes well, according to plan – if there are needs to change billing accounts, install phone lines and demand meters, and wait for a 10-day rescission period plus a large part of a billing cycle prior to the switch. Edison indicated to Staff that typical enrollments are taking 45 to 75 days, depending on factors such as:

1. Converting accounts from CIS into KCS, approximately 5-15 days;
2. Meeting all metering requirements, 10 or more days;
3. Allowing for a rescission period, 10 days; and
4. Scheduling a switch date so it coincides with the billing cycle, 0-30 days.

Figure 9: Duration of Enrollment Process for Sampled Customers In-Service

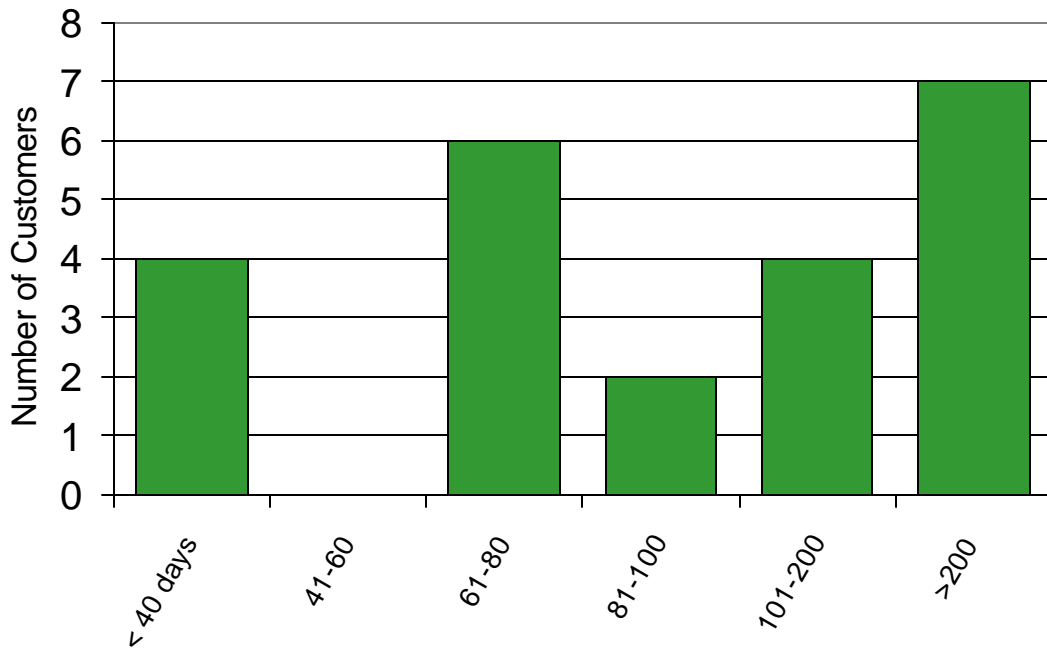
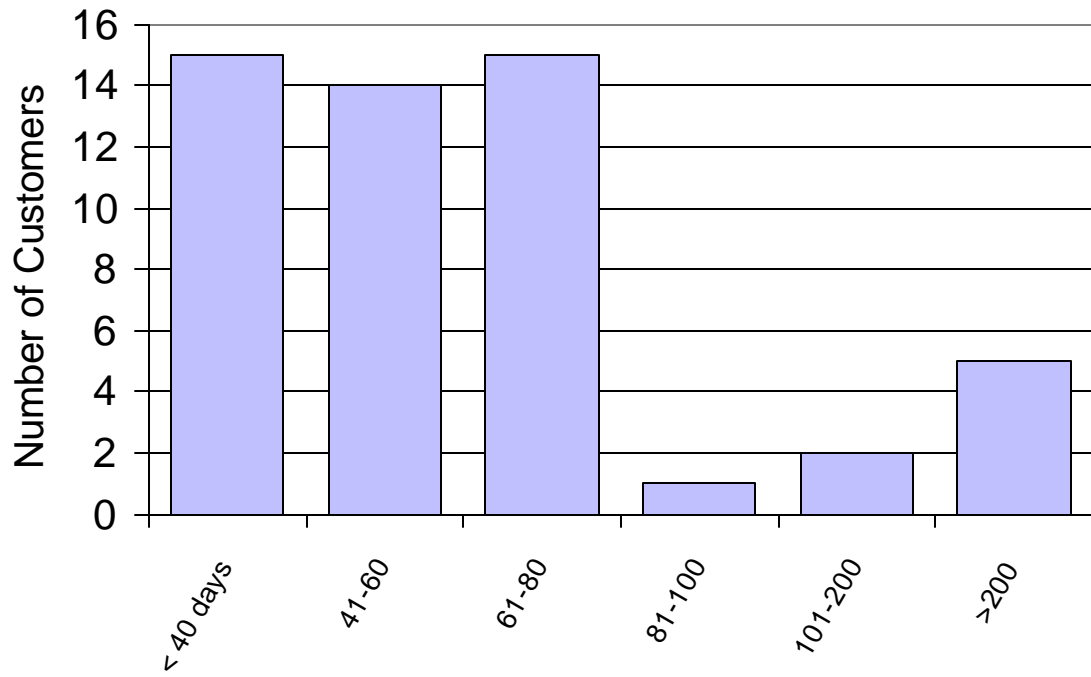


Figure 10: Duration of Enrollment Process for Sampled Customers Still Not In-Service



5 Summary Findings, Conclusions, and Recommendations

In completing this review of Edison's enrollment process, Staff intended to answer several questions:

- What are the sticking points in the enrollment process, why are problems occurring, and what has been done to resolve them?
- Does the enrollment process work quickly enough to be used for a completely open market, beginning in January 2002?
- Has Edison's process showed any favoritism or special treatment, either to specific customers or AES's?

Staff's most important findings concern fourteen specific problem areas identified in this review. These are summarized in Table 5 (p. 36). In Table 5, Staff has opined possible solutions for each problem area.

Throughout this investigation, Staff noted that Edison was almost always immediately prepared with a logical, plausible explanation for each and every problem that was identified by Staff. In addition, there were certainly some problems where the AES's, aggregators, and customers shared responsibility with Edison for delays. Nevertheless, Staff believes there is a need for Edison to utilize its experience to date to implement procedures and methods to enhance and speed up the enrollment process in anticipation of January 1, 2002.

The following are Staff's general findings, recommendations, and conclusions for Edison's enrollment process.

- 5.1 Staff did not find any evidence of favoritism being provided to specific AES's or customers.
- 5.2 Some customers were able to arrange for special treatment by negotiating directly with Edison. Staff has no reason to believe that Edison would not offer this same opportunity to other customers or AES's.
- 5.3 Edison's automated and manual management information systems do not provide sufficiently detailed information to easily track and facilitate the progress of enrollments through the process.

Edison's systems are not capable of tracking each enrollment through each step in the process. Not enough information about the process is captured and reported. Thus, when Staff asked Edison to provide data on the sample, Edison account representatives had to gather it manually. The system should provide more detailed information. For example, Edison could tell when the enrollment was

first submitted and its present status, but not how many days it spent in each stage of the process. Nor could they tell details about specific reasons for applications being rejected or why one might be stuck in a particular stage.

Even many weeks into this process and well after Edison learned there were serious problems, Edison still does not have a systematic means of identifying specifically which enrollments are stuck and whether responsibility for taking steps to move them forward belongs to Edison, the customer or the AES. It appears that Edison is only finding out about specific problem cases on an ad hoc basis as complaints are raised. This is information the management information system should automatically provide to Edison staff, and Edison should quickly resolve problems it can. Edison should notify AES's and customers when it believes they need to resolve problems, providing clear and complete directions about how.

5.4 Communication between Edison, AES's, aggregators and customers has not clearly provided information about process requirements, timelines and equipment requirements.

Many of the reported problems are simply communications problems involving Edison, AES's, aggregators and customers. All the parties must share responsibility for communications problems, but Staff believes Edison must explain requirements better and when problems do occur, quickly and completely identify and report problems and suggest solutions. In some cases, AES's, aggregators and customers did not share Edison's expectations for how long various steps of the process would take. Staff believes it would be helpful for Edison to clearly indicate the time frames it expects for each step of processing.

5.5 Edison's enrollment process completes many separate tasks in serial fashion. Efficiencies could be gained through parallel processing.

This is a general observation Staff made, which was also acknowledged by Edison. Edison set up a system that generally operates so that each step must be fully completed before the next one begins. There appear to be opportunities to refine procedures so that multiple steps take place in parallel. Similarly, it appears that Edison identifies and communicates enrollment problems one by one, as the enrollment works its way through the process. Staff believes it could be more efficient for Edison to identify and report multiple problems with an enrollment at once, and then give the AES and customer ample opportunity to resolve them prior to rejecting the enrollment.

5.6 Edison believes its process is only in a startup and transition phase, but it does not appear to be capable of efficient and effective handling of even the modest volume of customers migrating to ROA during the initial phase-in period.

Because of the many delays in the start-up of ROA service in Michigan, Edison had a long time to design, implement and test its enrollment system. The many difficulties with the first 1,700 enrollments suggest that Edison's testing was inadequate, incomplete or both. It is disturbing that Edison did not identify problems and take steps to correct them sooner and more quickly. Staff

believes Edison could have made much better use of the period between the first round of bidding in fall 1999 and the first significant numbers of enrollments in summer 2000. This time period offered ample opportunity to: improve communications with AES's, aggregators and customers; thoroughly test enrollment procedures and systems; identify problems and begin taking steps to resolve them.

Edison has been making some changes and adjusting its procedures. That is the company's responsibility and it needs to be done as expeditiously as possible, but Staff is not convinced that the changes being made are sufficient.

5.7 At this point in time, Staff believes Edison's enrollment process must be reworked to make it significantly faster and more efficient, before it can be considered satisfactory for application when full competitive arrives, in January 2002.

Table 5: Summary of Problems Identified and Staff Recommendations

Problem Identified	Possible Solution
Web Site Not Always Available and Web Site Operation Too Slow	Expand Web site capacity as needed to accommodate ROA growth. Make Web site available at least 95% of the time, and schedule downtime when system is least likely to be needed and used.
EDI System	Utilities and AES's should work together to try to achieve consensus on a single EDI standard or EDI-like standard for use throughout Michigan.
Communications Regarding Rejections	Edison should ensure enrollments can be tracked while being processed. All enrollments should be acknowledged in a timely manner, possibly within 24 hours. Reasons for rejections should be provided to AES's quickly and clearly.
Mismatches of Customer Identification Information	Edison should explore not rejecting enrollments for mismatches and should investigate and resolve questions quickly. Identification problems should be explained and rectified within two business days.
Unwarranted Rejections for Past Due Bills	Rather than rejecting enrollments for payment issues, Edison should suspend processing until the matter can be investigated. The suspension should be for a specified short period of time.
Accounts in "Wrong" Billing System	This problem must be completely resolved by Edison's late-November change to CSB.
Invalid Bid Information	Rather than rejecting enrollments for invalid bids, Edison should suspend processing until the matter can be investigated. The suspension should be for a specified short period of time.
Access to Meters	AES's, aggregators, customers and Edison must schedule site visits to facilitate access.
Telephone Lines	Phone line installation is an AES & customer responsibility. Clear and complete instructions should be available. When problems occur, timely notification should take place which clearly identifies required solutions.
Incorrect Meter Type	Edison should help customers and AES's identify meter type. If meter type problems occur, Edison should communicate them to AES and customer within one business day.
Switch Date Delays	Edison should complete switches in a prescribed time period, once the AES and customer are ready. Billing cycle and switch date flexibility should enhance the timelines of the total process.