

Comments for Package A

- No different than what we have today. No Settlement C can be completed without all the LSEs' consent
- This process allows affected parties to opt out which would keep the adjustments from netting to zero, because of the way UFE is uniformly applied.
- Replacing the internal bilateral form with the billing services agreement doesn't solve the problem. Using the term 'parties that wish to be involved' makes it difficult to get the total adjustment amount equal to the impact to individual parties.
- No. The EDCs already have the ability to perform partial settlements today outside of PJM market settlement process. We need a tool that requires full participation when a significant correction is needed for a time period outside of the Settlement B time frame. This option gives PJM sanction to the practice of LSEs only participating in error corrections when owed a refund and not participating when they owe money to another party. Allowing for partial settlements causes inequity in the market. We need a solution that promotes fairness. This does not resolve the EDC issues.
- Would rather see PJM perform settlement calculations for consistency.
- The billing services agreement would be helpful, but otherwise this doesn't make significant improvements.
- In some respects Package A seems to be a step backward in that it puts members in the position of having to run resettlement calculations, rather than processing through the PJM settlement system. It also adds a fee for resettlement, where none exists today. Doesn't solve the problem of requiring unanimous consent to execute a full resettlement. Although partial resettlements are possible under this package (where they are not today), to achieve a complete resettlement all impacted parties need to agree by signing the billing services agreement.
- Our utility companies have existing M-2 processes for settlement beyond Settlement B which they like and don't have to pay a processing fee for. Having participants who only want to be involved participate is concerning. The timing having no limitation is also not acceptable. Transparency is desired for LSEs from the EDCs who are performing the calculations.
- This is not an improvement over the status quo. Similar bilateral financial adjustments are already allowed by PJM.

Comments for Package B

- No details about deadlines and rules for Settlement C are mentioned
- With caveat that PJM make the current ad hoc use of their MSRS settlement system program available for use in the determination of any such adjustments as necessary, with this conditional support as long as there is still an option to do a bi-lateral, financial adjustment for smaller corrections (i.e., under 3,000 MWh for example). .
- Still a very manual process for the EDC so this does not solve the problem.
- No. Errors that impact LSE market costs should not be limited strictly to retail meter errors. This Package is too restrictive as to when a Settlement C can be performed. However, agree with Package B premise that retail customer rebillings need to match up with wholesale energy purchase obligations and retail customer revenue streams for each retail supplier in the affected zone.
- The proposal doesn't provide any additional tools or incentives for accurate metering or timely corrections.
- Could support as long as there is still an option to do a bi-lateral, financial adjustment for smaller corrections (i.e., under 3,000 MWh for example)
- Would like to clarify that the term "meter error" as used in the package description includes both errors with retail meters themselves, as well as EDC meter collection and settlement systems. Would it be more efficient to have PJM process the resettlement calculations?
- Details on threshold need to be developed.
- Would support as long as there is still an option to do a bilateral financial adjustment for smaller corrections (i.e. under 3,000 MWh for example)
- Although the rules around member consent are more favorable, it is important that the resettlement be applicable to all metering including wholesale. Wholesale metering issues will impact all LSEs in a zone due to the allocation of unaccounted-for-energy. It is also preferred that PJM performs the billing calculations so that errors can be minimized.

Comments for Package B-Prime

- Same as package B plus the fact that the UFE should be allocated to all the customers not just to interval metered customers.
- As the market evolves most retail customers will have hourly metering so this basically says we'll have sett C until then & then it goes away. Meaning post 60 day resettlements will then not be allowed for any customers.
- No. Many, if not all, EDCs do not have the ability to apply a resettlement only to the non-interval metered accounts served by an LSE. What happens for those EDCs that are 100% interval metered? As long as UFE is allocated to both interval and non-interval metered accounts this method does not work.
- We don't support Package B overall, but do appreciate the specific exclusions with regard to hourly retail meters.
- Hourly metering/interval metering is just as prone to errors with meter equipment and/or upstream EDC meter collection and settlement systems. Often the interval metering/billing errors are of the largest dollar value, and therefore the most critical to get corrected.
- We are not sure why hourly metering would be excluded as it is our belief that Settlement C is most often used for these purposes.
- Same issues as Package B.

Comments for Package C

- Absolutely NOT! This is not a system enhancement, nor does it recognize the realities of today's settlement environment.
- Does not address the issue. Mechanical failure exists - we can not ignore that.
- No. Does nothing to promote full participation or an equitable resettlement process when errors occur that require funding a significantly harmed party.
- Since the process already requires assent from the participants, shortening the window doesn't provide any value.
- "Doing it right the first time in Settlement A" is impossible given the capability of the majority of metering technology currently deployed. In fact, Settlement A is often conducted based on consumption estimates that are expected to be trued up in Settlement B. Do not support shortening the timeframe for Settlement C to 18 months as metering errors are currently being found as late as the current 24 month deadline. Does not solve the problem of inability to get full LSE consent for Settlement C.
- We prefer the 2 years to align with cancel/rebill process for retail.
- Preference is to keep deadline at 24 months.

Comments for Package D

- In our opinion, this is the most desirable, and most progressive package that is possible in today's environment to move this issue forward and allow for a realistic solution to the problem of what to do with necessary settlement adjustments beyond the 60-Day current Settlement B reconciliation process.
- Have any statistics been compiled around how long after the operating day most settlement C adjustments occur? While this package is good, most of the settlement C adjustments initiated by our company occur between the 1-2 years following the operating day.
- Why add a formal resettlement at an arbitrary point in time. Makes no sense to just pick a date so everyone is burdened with more data processing when there is no data to back up the fact that this will help solve the problem
- Yes. This provides EDC with a tool that allows for full resettlement of the market via PJM, providing an equitable resolution to meter errors and retail rebill issues. Limit on bilateral adjustments provides some certainty to market.
- We will seek clarification here or in any draft language that this will not affect the status of hourly metered municipal entities. But we are generally supportive of an opportunity to correct for the errors that will inevitably happen, whether they are meter errors or account assignment errors, within what seems to be a reasonable timeframe.
- These changes would be administratively burdensome and cost prohibitive. Many corrections are outside the 6 month window. Concerns around the opt-in provision for bilateral settlements beyond 6 months.
- Allowing a full resettlement at 6 months without member consent is a clear improvement over the status quo. This gives all affected parties more time to review the accuracy of the settlement data and the opportunity to make the market whole as needed.
- we have no issues with the settlement C at 6 months, however the caveat with the State PUC ordering resettlements is the only thing that is a concern. If that was to be removed from this package, [removed] would be in support

Comments for Package E

- No detailed plan for this package.
- Or, more accurately, maybe.
- If EDC's must still work with LSE's to come up with a resettlement solution then the LSE consent essentially still exists. Agreement by LSE needs to focus on whether the original settlement data was inaccurate as opposed to whether they want to participate or not. Process similar to inschedule might be the solution - where LSE's can consent to MW changes.
- No. Might agree with package if the Definition of Member Consent was changed for EDCS must consent to LSEs within affected zone must consent.
- We don't think that EDCs really have an incentive to initiate the resettlement process if they aren't benefiting; significant errors may continue to go unaddressed.
- We can support this. We like the deadline for adjustments to end after 2 years. Very similar to our existing M-2 process.
- For Package E: There needs to be a time limit of 1 year to 18 months.
- This is the preferred package because it solves the main problem with obtaining affirmative consent from all parties and gives the EDC the full discretion to pursue resettlements that are believed to be equitable and fair. This package has the added benefit of limiting the settlement impact to only the affected members and not market participants in other zones.