

1. 2020 Selection Period.

- a. The program ran smoothly in 2020.
- b. Nothing of note.

2. Customer Education

- a. No additional outreach. WRE believes that that is the responsibility of the administrator / PSC.
- b.
- c.

3. Delegation Agreements

- a. WRE continues to argue that the delegation process provides value and options for the residential customer.
- b. Yes, DA’s should be available for all commercial customers. WRE recommends that suppliers should be able to market to commercial customers on a year-round basis. Suppliers are currently permitted to market to agricultural customers on a year-round basis. There would seem to be very little basis for arguing that one class of commercial customer should be treated different manner than another.

In the past the administrator has argued against delegation forms because of the associated overhead. The administrator should be encouraged to invest resources to streamline the enrollment/delegation process rather than limiting customer options.

4. Selection Period

- a.
- b.

5. Dispute Resolution

- a.
- b. A Standard policy of sanctions and remedies for violations of the Code of Conduct is desirable. As it stands, there is very little consequence if a supplier engages in practices that are not consistent with the code of conduct. A standard policy of sanctions will ensure that all suppliers operate from an even starting point. Customers will benefit from the resulting transparency.
- c. WRE recognizes that it difficult for the administrator to be the enforcer. However, there is rarely if ever a satisfactory resolution of a complaint. The same violations of the code of conduct seem to continue unabated.
- d. The “default” market is a primary reason that most suppliers participate in the choice programs. Sanctions that put that limit a supplier’s access to the default market could be a very effective enforcement tool.

6. Default Pricing

- a.
 - i. WRE applies the same methodology that it uses in the selection period, to price default customers. WRE has used the same methodology since it began participating in the program(s).
 - ii. WRE prices all customers on individual basis. However, the parameters used do not change. On that basis, WRE default customers pay the same amount as customers who participated the selection process. Sales promo's run during the selection period can marginally benefit customers who select during the selection period.
 - iii. WRE prices every default customer on an individual basis. Prices are determined by customer specific factors.
- b. In general, WRE supports limits on default pricing. Customers should not be penalized for not participating in the choice programs. However, a mandated price would be difficult to formulate.

WRE supports a change in the choice program where all of the default customers auctioned off in a similar to how default volumes are managed in East Dominion choice program in Ohio. With that type or similar process in place, the PSC could be assured that default customers would be paying a market rate and are not unduly subsidizing the customer acquisition expenses associated with the choice program.

7. Energy Options

- a. At the present time, Black Hills ("BHE"), requires supplier to take assignment of the transport required to meet the combined MDQ of the supplier's customers. This requirement is reasonable. However, the allocation method is slanted in favor of the distribution company. BHE typically allocates the most expensive, least desirable transport. The primary receipt is usually Northern Natural transport with a primary receipt at the expensive Ventura hub.
- b. WRE supports an allocation process that would include transport from both NNG and NGPL. In particular, NNG transport should include Demarc receipts on a pro-rata basis.

At the present time time, suppliers are not required to purchase transport in the summer months, WRE would support a summer allocation. The goal is to make the playing field as even a possible so that customers can make a choice.