

Subj: **REQ Request for Comments- Billing and Payment**
Date: 11/21/2003 2:05:56 PM Central Standard Time
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To: [NAESB office](#)

American Electric Power wishes to submit the following comment pertaining to the proposed Model Business Practices for Billing and Payment, to be considered by the Retail Electric Quadrant Executive Committee.

Sections 2.4 and 2.5 describe Model Business Practices for Consolidated Billing - Bill Ready Billing and Consolidated Billing - Rate Ready Billing, respectively. However, new markets should not be indifferent as to which of these approaches to adopt as the standard business practice. Negotiating over, and then identifying the form of bill data delivery in the Billing Services Agreement (listed as a key component) is not appropriate, since this may well lead to many market participants being required to support both forms within the same market. In order for NAESB recommended business practices to provide as much value to state regulators as possible, the REQ should make a definitive recommendation for either a bill ready or a rate ready business practice.