

Subj: **FW: Retail Gas/Retail Electric Comments: RGQ Item 6**
Date: 11/21/2003 1:44:35 PM Central Standard Time
From: Lori VanWest – Xcel Energy
To: [NAESB Office](#)

Requests for Comments re: RGQ Customer Processes Subcommittee
Request No.: 2003 RGQ Annual Plan Item 6
(comments originally pertain to Retail Gas, but can apply to Both)

Date: November 21, 2003

From: Don Basler, Manager, Natural Gas Services
Xcel Energy

Comments concerning Disputed Payment Processing for Consolidated Billing, sections 2.7, 2.8, 2.9, 2.10

The standards appear to imply that a billing dispute is a valid reason for customers to withhold payment, which is not true in all jurisdictions. For example, the currently approved Xcel Energy Gas tariff in Colorado requires payment in full, even if disputed. If (after investigation) the dispute is verified and upheld, the utility refunds the overpayment or credits the customer's account in full. While section 2.7.1.5 recognizes input from the Applicable Regulatory Authority, it is unclear whether this applies only to the allocation of payments received, or the over-riding requirement to pay.

Therefore, we suggest that reference to withholding payment of disputed amounts be deleted in the standards themselves and included in more detail under the Billing Services Agreement for Consolidated Billing, where it can be tailored to the regulatory requirements in place. If not, then we recommend inserting or clarifying the standards in the Consolidated Billing General Section (2.7) so it more fully addresses the issue concerning the acceptability of withholding a disputed payment unless otherwise directed by the Applicable Regulatory Authority.