

From: Harry Kingerski [<mailto:hkingerski@sparkenergy.com>]
Sent: Friday, February 03, 2012 11:41 AM
To: PC, OCMO
Subject: End-State Proposals - Comments from Spark Energy

Thank you for offering to accept comments from parties that had not earlier submitted an End State proposal. Spark Energy appreciates the effort and thought that parties made in presenting their End State proposals. Spark Energy offers these brief comments:

- As suggested by Direct/Dominion/IGS, we support the notion that an End State does not require a default service product, either from an EGS or EDC. In the End State, all customers should have individual contracts with EGSs.
- As suggested by RESA, we support the notion that an End State does require a backstop Provider of Last Resort, that the POLR service should be reserved for situations of EGS default, and that the POLR price be reflective of hourly market conditions with appropriate adders to compensate the EGSs serving as POLR providers for the costs and risks of providing such service.
- We support the notion that ultimately, billing should be unbundled in the End State and that billing should be a supplier responsibility. However, we suggest that this transfer of responsibility does not have to occur on Day 1 of the End State, but rather should occur through a managed transition process. Day 1, supplier consolidated billing should be available on an individual customer basis. At the same time, utility billing services should be unbundled and suppliers should be able to request bill messaging, additional line items, and additional rate formats at cost-based utility billing rates. Beyond Day 1, discussions could commence on a plan for total transfer of billing functions to a competitive state.

Thank you again for accepting these comments.



Harry Kingerski | Director - Regulatory
2105 CityWest Blvd, Ste 100 | Houston, TX 77042
Tel: 832.217.1858 | Cell: 713.205.2945
hkingerski@sparkenergy.com | <http://www.sparkenergy.com>

Connect with Spark Energy

