

Case No. 12-M-0476 et al.
EDI Business Working Group (BWG)/
Technical Working Group (TWG)
Final Minutes – August 19, 2016

Administration

- Review/Modify Agenda: The Draft Agenda was adopted.
- The Draft Minutes for the 7/22/2016 and 8/5/2016 meetings were adopted as final with modifications to the attendance lists in each set of meetings.
- DPS Staff Remarks: None.

Regulatory Update

Kristen Ewing (DPS Staff) noted the Extension Ruling was issued on 8/2/16 granting an extension of an additional 90 days to December 1, 2016 for testing and implementation of the APP Credit EDI changes.

Review of Implementation Plans for Current EDI Standards

Updates to Implementation Matrix

- No benchmark items from the 6/30/2016 Report have been identified yet.
- For the 1/29/2016 Report, Con Ed has decided not to support the optional 867MU Bill Option segment.
- None of the other utilities on the call had changes to their items in the matrix.

Updates to EPA Support Matrix

- Updates from National Grid, NYSEG/RG&E and O&R will be provided in the matrix; the Con Ed updates during the meeting and will be reflected the next time the EPA matrix is reviewed.
- A note will be added to the bottom of the matrix that depending upon the regulatory calendar, that some benchmark projections for 2016 may slip to 2017.

Low Income Moratorium Order EDI Impact

A workpaper that included technical questions from Petition for Rehearing and Clarification of the National Energy Marketers Association (NEM) was reviewed. Some of the NEM questions touched upon Moratorium Order-oriented topics discussed during recent EDI Working Group meetings.

a) NEM members are not aware of any existing EDI transaction that will allow the utilities to transmit the switch block information to ESCOs along with the requirement that the customers have to be returned to the utility.

The BWG Chair mentioned that it was not completely settled yet whether the utility would be communicating customer block information of eligibility status regarding the customers in

question. He then noted that use of EDI is not in the Order and that given the immediacy of the initial date by which the utility is required to communicate information to ESCO, the approach of using secure files (spreadsheets or flat-files) as outlined on the Moratorium Order would be followed. The EDI Working Group is considering addition of an optional 814C segment to communicate subsequent customer block/eligibility information to ESCOs. Utilities can, however, continue to use secure files for this purpose. Utilities would consider the number of APP customers and corresponding EDI volume, for example, in making their decision whether to support the optional EDI segment.

The Low Income Moratorium Matrix will track whether a utility plans to support the new EDI segment and if so, projected and actual implementation dates.

Juliana Griffith (National Grid) re-affirmed the optionality of the EDI segment and noted the Moratorium Order does not mandate how often new lists of customers would be generated. The frequency is a company by company design decision like influenced by the same factors influencing support of the optional EDI segment; frequency could be daily, weekly or monthly, for example. Utilities could simply post the lists or optionally, provide an auto-generated email message to the ESCO notifying availability of a new list.

NFG noted daily generation of lists posted on its secure web site was a likely approach but that doesn't mean new files would be available every day. NFG customer eligibility is tied to the HEAP process so additions are more likely during the winter on what might appear to be a sporadic basis. Additionally, some customers declared to be APP customers initially may be removed from the list so a bulk customer status change would be provided to the extent the ESCO was still serving the customer. It was noted that if an APP customer had a customer initiated block, the block should stay in place even if the customer loses its APP Status.

Stacy Rantala (NEM) asked if the list of blocked customers would also note which ones have to be returned to utility service. The BWG Chair noted that the second piece of information is equivalent to reporting eligibility status.

b) The "blind" communication of the block information by the utilities to ESCOs is likely to lead to difficulties. For instance, account numbers may not match. In addition, a customer may mistakenly be included in the block, and ESCOs will have no means to verify the accuracy of the customers included in the block.

NFG in its preliminary analysis came across the same issue and while it initially thought providing the account number alone was required by the Moratorium Order, it is considering sending the name of the customer along with the account number. Janet Manfredi (Central Hudson) said they plan to provide the account number and the name on account and set up a weekly update in a secure file available from its web site.

Stacy Rantala asked if the list of blocked customers was for the entire utility system or whether there would be ESCO-specific. It was clarified that all utilities plan to provide ESCO-specific lists of the customers they are serving that are no longer eligible for ESCO service.

The BWG Chair suggests that while this is not technically an EDI item, identification of a file structure and website posting would be tracked in the Low Income Moratorium Matrix. Kris Redanauer (Direct Energy) said uniformity among the utilities would be desirable even if the files included only account number and name. The BWG Chair suggested the approach NFG and Central Hudson were advocating was a place to start. If other utilities thought other items should be included, it's possible all utilities could support the same items.

c) The Order does not address how current ESCO APP customers (as identified by the utilities in accordance with the Order) that are currently under a fixed term contract and that subsequently do not participate in the APP program while still on a fixed term contract will be permitted to shop, with the block removed from their account.

If a current ESCO APP customer has a long-term contract with an ESCO, ESCO service will continue with the current ESCO but the customer will not be able to shop with other ESCOs. If the current APP customer that drops off status that status, they have the low income oriented block removed and will be permitted to shop for ESCO service. Stacy Rantala emphasized that notification of APP status removal is critical so customer is allowed to shop if they want. The utility block lists need to be refreshed with the most current customer information.

d) When an enrollment is rejected, the reason for the rejection will not be known by the ESCO. If there was a mistake in the enrollment information that is unrelated to a customer's low income status, the ESCO will not have any means to identify the correctable error and will not be able to remedy the situation.

The BWG Chair noted that not providing the customer's APP Status is by design as stated in the Order. The ESCO will be told there is an enrollment block on the account but not why the enrollment block is present. The ESCO can, however, contact the customer to determine why the enrollment was blocked. If it is a customer-initiated block, it can be removed by the customer. If it is a low-income initiated block, the Order says the ESCO should not market to the customer. If the customer does not know or does not want to reveal their APP Status, the ESCO may have to ask a question that indicates APP Status, e.g. did the customer get a HEAP grant last year? In the end, the low-income block is determinative whether or not the customer provides their status.

NFG noted that if an ESCO asked why a block was in place, the initial response to the ESCO would inquire whether they had spoken with the customer. The utility can tell the customer whether the block is low-income initiated and the customer can choose to pass that along to the ESCO.

Juliana Griffith pointed out that ESCOs may ask utilities when the ESCO enrollment gets the rejection message, but marketing is the time to contact customer to ask them to remove a block on their account. Grid plans to provide an email response to queries about blocked enrollment stating simply that the account is not eligible for customer choice.

The distinction between a customer-initiated block and a low income block was seen as critical. It is important that the utilities identify when blocks are customer-initiated so that ESCOs can ask customers to remove them.

Juliana Griffith then asked about the utility sending a second letter to ESCO customers who are currently non-APP but who become APP customers. Grid is considering an auto-generated letter from their billing system. The BWG Chair said this was not an EDI item and that the Order

doesn't appear to require the letter but logically, the letter would be similar to the letter going to current ESCO APP Customers.

Low Income Moratorium Order Matrix

The BWG Chair and Mary Do (Latitude) now have enough information to develop a matrix to be presented at the next meeting. A matrix template will be circulated prior to the next meeting for utility input.

Proposed EDI Changes

The BWG Chair will work with a small group to draft a new optional segment for the 814C EDI transaction to communicate changes in customer eligibility or block status in response to the Moratorium Order.

Phase 1/II Testing of Utilities

PSEG-LI, which is a utility, plans to start supporting EDI. The expedited EDI testing process in the EDI Standards is designed for ESCOs but conceptually could be applied to new utilities, e.g. testing using an established EDI Service Provider. After discussions with DPS Staff, this approach has been taken. At this point, the EDI Guides need to be updated to reflect expedited testing for utilities. Gary Lawrence (Energy Services Group) modified the existing ESCO form which is shown in a workpaper. Once the form is finalized, proposed language modifications for the Test Plan Standards documents will be developed for review during an upcoming meeting.

Qualification of new EDISPs

This topic will be deferred because its sponsor is focused on Low Income Moratorium Order oriented issues. It will be addressed when priorities permit.

Other Business

None.

Establish Date/Time for Next Meeting

The next meeting will be a combined BWG/TWG meeting on Friday 8/26/2016 at 10 AM dedicated to Low Income Moratorium-oriented items. The next meeting following a customary agenda will be 9/9/2016 at 10 AM.

Attendees

Adam Powers – Ethical Electric	Jean Pauyo – O&R
Alecia Stehnicky – Crius Energy	Jeff Begley – NOCO
Amie Williams – Agway	Jennifer Lorenzini - Central Hudson
Angela Schorr - Direct Energy	John Cooney – National Grid
Barbara Goubeaud – EC Infosystems	Juliana Griffith – National Grid
Barbara White – Ambit	Kris Redanauer – Direct Energy
Blake Birch – Nordic Energy	Marie Vajda – NYSEG/RG&E
Charlie Trick – NYSEG/RG&E	Mary Agresti- National Grid
Cindy Tomeny – National Grid	Mary Do – Latitude
Craig Wiess – National Grid	Mike Novak – National Fuel Gas Dist.
Debbie Rabago – Ambit	Rachel Fry – Direct Energy
Donna Satcher-Jackson – National Grid	Rock Carbone – Agway
Elois Anderson – National Grid	Samantha Curry- Starion Energy
Elorita Martinez – National Grid	Stacy Rantala - NEM
Eric Heaton - Con Ed	Tom Dougherty – Marketwise
Erin Horleman - Aurea	Tracie Gaetano – IGS
Ethan Kagan – Direct Energy	Travis Bickford – Fluent
Gary Lawrence – Energy Services Group	Tyler Lones - Aurea
Janet Manfredi – Central Hudson	Veronica Munoz – Accenture