

**Case No. 12-M-0476 et al.**  
**EDI Business/Technical Working Groups**  
**NFG ECB Prohibition Order Requirements**  
**12/8/2017**

Excerpts from CASES 12-M-0476, et al. PROCEDURAL ORDER REVISING IMPLEMENTATION DATES (“Procedural Order”), issued and effective November 22, 2017.

Selected ESCO Consolidated Billing Model (“ECB”) Ordering Clauses (Procedural Order, pages 2-4)

*3. Energy service companies that participate in the ESCO Consolidated Billing Model in National Fuel Distribution Corporation’s service territory are directed to, by December 6, 2017, communicate to National Fuel Distribution Corporation which accounts the ESCO, on behalf of the customer, is receiving a HEAP payment.*

*7. Energy service companies that participate in the ESCO Consolidated Billing Model in National Fuel Distribution Corporation’s service territory are directed to, on a rolling basis, communicate to National Fuel Distribution Corporation which accounts the ESCO is receiving a HEAP payment on the customer’s behalf.*

NFG has a similar issue with implementation of CASE 14-M-0565 - Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low Income Utility Customers, ORDER APPROVING IMPLEMENTATION PLANS WITH MODIFICATIONS, Issued and Effective February 17, 2017. It needs to know both which ECB ESCO customers receive HEAP payments and the amounts of those payments. In terms of 12-M-0476 et al. this information would qualify the customers as APP customers.

For both 12-M-0476 et al. and 14-M-0565, NFG also needs to know when ECB ESCOs determine that customers are no longer APP customers. In both cases, even though most ECB ESCOs do not have waivers to serve ineligible customers and therefore would eventually be de-enrolling the customer, the date of de-enrollment is dependent upon the expiration date of the ESCO contract with the APP customer. In the interim, NFG would calculate discounted delivery charges for the APP customers which would presumably be reflected on the ECB ESCO’s bill to the APP customer.

**DESIGN CONSIDERATIONS:**

NFG believes this information should be communicated from the ESCOs through EDI. There are two basic approaches: 1) Creation of a new “incoming” 810SR transaction based upon a comparable transaction from the TX market and 2) Addition of a change reason code and AMT segment to the 814C.