

**Case No. 12-M-0476 et al.
EDI Business Working Group (BWG)/
Technical Working Group (TWG)
Final Minutes – October 5, 2018**

Administration

- Review/Modify Agenda: The Draft Agenda was adopted without modification.
- The Draft Minutes from the 9/21/2018 meeting were adopted as final without modification.
- DPS Staff Remarks: None.

Regulatory Update

The BWG Chair noted that while there had no specific action directly impacting EDI since the last working group meeting, with regard to matters in Case No. 18-M-0376, new FAQs for Self-Attestations and DSAs was posted this morning. Additionally, the DPS Staff Report on the Status of the Business-To-Business Collaborative to Address Cyber Security in the Retail Access Industry issued on 9/24 was posted on the DSA/VRA web page. There were no questions.

Updates to EDI Implementation Plan(s)

a. Current EDI Standards Matrix

Mike Novak (National Fuel) noted that they would be opening a testing window for the Low Income Program related changes that are scheduled for implementation on 12/1/2018. Otherwise, there were no further changes were provided during the meeting.

Next EDI Report

The BWG Chair reviewed the items that would be included in the next EDI Report filing would tentatively be scheduled for November 30, 2018.

With regard to the gray box note conventions, the BWG Chair reviewed a workpaper showing the proposed modifications including commentary from the TWG Chair suggesting further modifications.

The BWG Chair will review the TWG Chair's consistency commentary regarding Mailing Address segments (N1, N3, N4 and PER) offline.

With respect to REF*7G, the utility is rejecting an ESCO request with their rejection response; there is no Utility Request or ESCO Response to a Utility Request so those items will be changed to Not Used. Should an ESCO disagree with the utility's response, it may contact the utility via non-EDI means, i.e. it does not reject the utility response via EDI (a clarifying

sentence will be added. Based upon the utility's response to the ESCO, the ESCO may resubmit the original request.

With respect to REF*AJ, the TWG Chair suggested the items should be conditional or optional in both directions since some utilities require that it be included. Even if the utility doesn't require it on the 814 Change (but does require it on the 814 Enrollment), then the ESCO should have the option to send it on all 814s. Gary Lawrence (ESG) noted that REF*AJ is not a change of the Utility's Account Number for the ESCO; rather the utility requires the Utility's Account Number for the ESCO be sent when the ESCO submits a change request. The gray box note will be modified accordingly, including modification to the description of the segment's purpose.

With respect to REF*SU, the TWG Chair suggested that some utilities did support this segment but upon review with the utilities on the conference call, no utilities support the segment. The BWG Chair suggested that it be removed. Eric Heaton (Con Ed) suggested that the decision to remove it be deferred for a few years. The BWG Chair noted that under a pure single retailer implementation, the ESCO is in control of this information so that stating that there would be no utility response is accurate.

GISB EDM Discussion

The BWG Chair reviewed an updated workpaper showing proposed modifications to the TOP guide updated for discussion at the last meeting. The BWG Chair noted the TWG Chair's recommendation that GISB EDM 1.6 be a firm requirement, i.e. no optionality for utilities to support a higher version would be provided. The decision to move to a higher version, e.g. GISB EDM 1.9, would be deferred to the new Cyber Security Working Group.

With respect to the PGP public key size, Mary Do (Big Data Energy) noted that most other jurisdictions require a 1024-bit key. There was discussion that a 1024-bit key could be a minimum; utilities could require a greater size, e.g. 2048 or 4096. After further discussion, it was determined that the 1024-bit key should be required and that future changes to the required minimum size could be addressed by the new Cyber Security Working Group.

It was also noted that the NY EDI Standards require that public keys be changed annually but in practice this was not being done. During discussion, it was noted that whenever keys are changed, new connectivity tests are necessary. The BWG Chair suggested that the annual requirement be changed to 'periodic' and that the period would be defined by the new Cyber Security Working Group. For example, if the period were four years, one quarter of the ESCOs could be changed each year. Jeff Begley (NOCO) and the TWG Chair agreed with this approach.

The BWG Chair noted comments suggesting that CD-ROMs should be removed from the list of alternative secure electronic medium because new PCs typically no longer are equipped with such devices. Various proposed language changes, including a notation that CD-ROMS are becoming obsolete, were considered. The use of cloud services was also discussed. The TWG

Chair noted that access to cloud services was not a fool-proof solution; the same event that denied access to EDI over the internet could deny access to cloud services.

The TWG Chair question whether utilization of alternative secure electronic medium was a workable approach. The BWG Chair noted that some parties believe that utilities should have backup EDI Service Providers with some means of automatic failover. The TWG Chair pointed out that an automatic failover to a backup EDI Service provider could be very costly.

The issue of using alternative secure electronic medium as a backup will be deferred to the new Cyber Security Working Group. In the interim, “will be used” will be changed to “should be used” because in practice, that is what is currently possible. The list of devices will be cast as examples and coordination between trading partners will be added to the list.

The BWG Chair asked utilities to identify a timeframe for implementation of GISB EDM 1.6 and other related modifications to the TOP.

Other Business

None.

Establish Date/Time for Next Meeting

The next meeting combined BWG/TWG meeting is scheduled for Friday 10/19/2018 at 10 AM.

Attendees

Alan Castro – EC Infosystems	Barbara Goubeaud – EC Infosystems
Emily Cimoli – Clean Choice Energy	Sergio Smiley – National Grid
Gary Lawrence – Energy Services Group	Tom Rankin – Marketwise
Jasmine Acosta – Customized Energy Solutions	Liz Ciborowski – NYSEG/RGE
Judi Larison – UGI Energy	Angela Schorr – Direct Energy
Bobby Hemphry – Constellation	Mary Do – Big Data Energy Services
Amy Delooza – Agway Energy	Mike Day- IGS
Debbie Rabago – Ambit Energy	Mike Novak – National Fuel Gas Dist.
Veronica Munoz – ATMS	David Parnell – Direct Energy
Pete Foster – NYSEG/RGE	Rebecca Sweeney – DPS Staff
Nicole Barker – National Fuel Gas Dist.	Travis Bickford – Fluent Energy
Jeff Begley – NOCO	Eric Heaton – Con Edison
Jennifer Lorenzini – Central Hudson	Janet Manfredi – Central Hudson
Diane Neira – NYSEG/RGE	Kim Wall – Hansen Technologies
Kris Redanauer – Direct Energy	