Case 12-M-0476, et. al.
EDI Business Working Group (BWG)
Final Minutes – June 13, 2014

<u>Administration</u>
- Review/Modify Agenda: The Draft Agenda was adopted and unmodified.
- The 6/6/2014 Draft Minutes were reviewed and finalized reflecting modifications to clarify that an 867 HU transaction would not be provided if there was a block on the account, and to the extent a block was removed or had never been in place, that non-usage data would still be provided in the event no usage data was available.
- DPS – no remarks.

<u>Business Discussion on Implementation Guide Language</u>

1. NYPA/Recharge NY Indicator

The BWG Chair spoke with DPS Staff during the past week to review the recent developments concerning the availability the identity of ReChargeNY customers within a public NYPA document and the possibility of non-EDI solutions that met the goals of the 2/25/2014 Order. Staff indicated a willingness to consider a non-EDI solution; however, ESCOs would have to agree that the solution was acceptable. Further, discussions with NYPA would have to take place to ensure that NYPA would be a reliable/predictable source of information. There may also need to be an agreement between NYPA and DPS for the report from NYPA for DPS to post.

There was discussion noting that with less than 1000 ReChargeNY customers state-wide, relative to the total number of accounts, this ReChargeNY Indicator would be a low-volume transaction which typically is not best-suited to EDI. The importance of making this information readily available to all ESCOs was reiterated. The non-EDI solutions offered, in order of preference, were as follows:

- A master list showing customers organized by utility would be posted on a DPS web page. Monthly updates would be based upon changes provided by NYPA.
- A utility specific list showing customers would be posted on a utility web page. Monthly updates would be based upon changes provided by NYPA.

Under either of the non-EDI options, the information would be available to all ESCOs, all the time. While an EDI-based solution has been developed within the working group and is feasible, utilities generally believe a non-EDI solution could provide the required information in a more cost-effective manner.

This issue will be raised in the EDI filing due in late June.

2. Utility Discount Indicator

There was discussion about whether it was necessary to communicate a utility delivery discount if the discount was applicable whether or not the customer's commodity was provided by the utility on an ESCO. The BWG Chair noted the Order language didn't support this distinction even though the suggestion is practical. An EDI transaction has been developed that corresponds to what the Order required but there may still be a regulatory means to pursue this alternative approach. At the very least, the issue can be raised in the EDI filing due in late June.

Business Discussion

1. Reject Reason Codes

The 2/25/2014 Order called for development of enrollment rejection reason codes, in particular, a code indicating that the customer has an "enrollment block" on his or her account. No new codes have been proposed in the BWG meetings and a "CAB" code to indicate an "enrollment block" already exists. EDI development which would in some cases inform the ESCO of the presence of a block(s) prior to enrollment has taken place. This would permit ESCOs to contact customers prior to enrollment to request removal of the block. As a result, there should be fewer enrollment rejections due to customer blocks. This will be addressed in the 6/25/2014 EDI filing to the Commission.

2. Low Income Program/HEAP Customer Indicator

There was no new significant business discussion on this item – further technical discussion was deferred to the TWG portion of the meeting.

3. Full Service Billing Amount History

Work on design of the optional 503 transaction commenced. The primary purpose of the transaction was to provide information to the ESCO that would be used when calculating bill credits due to customers, relative to utility full service billing amounts. The 503 differs from the historic billing calculators on utility web sites because it is oriented towards the ESCO providing service while the web site is oriented towards the customer. Other non-EDI options are available but in some cases, the 503 may be the most efficient means to provide an accurate accounting of what the utility would have billed over a period of time. Utilities would be in control of the optionality; each would be in control of whether it decided to utilize the 503 transaction.

Where implemented, the general process would be that the customer's ESCO would send a 503 request to the utility who would reply with 12 months of utility full service amounts (when available) and ESCO billing amounts for the month's when the ESCO served the customer. There was some discussion of responding with an 814 transaction but the group agreed that it appeared best to keep the transaction "clean", i.e., a 503 transaction returned in response to a 503 request.

In addition to the customer account number and monthly billing amounts, other design considerations were as follows:
- Like the web site calculator, billing history where the utility does not issue the bill would not be provided in the 503.
- Billing history for non-current ESCOs would not be provided.
  - Only the ESCO currently serving the customer could submit a 503 request but an ESCO observed that there needs to be a window of at least month following the date when an ESCO ceases serving the customer where the former ESCO would have access to the data to calculate a final bill credit, for example.
- The DUNS+4 number (which would accommodate a standard DUNS number) would need to be included in the 503.
- Customer name would be included but likely as an optional item.
  - This would be convenient for Service Providers that offer "EDI Viewers"
- Reject Reason codes for the 503 will have to be developed.

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Development of the 503 will be mentioned in the 6/25/2014 EDI filing but it is premature to include any details because development has only just begun.

4. ESCO Bill Credit Transaction

The approach of using an 812 transaction for the credit was disposed of so the focus moved to using an 810 credit transaction (used in the bill ready model) as a template to develop a transaction for both the bill ready and rate ready models. Under this approach, a new code would be necessary to clearly identify the purpose of this credit. The ESCO would be in complete control of the calculation, and frequency of the bill credits which from a bill presentation perspective, simplifies the process for the utilities.
- With the ESCO in control of the calculation, there would be no control to prevent other the ESCO from offsetting or augmenting the amount to reflect other products/services.
  - This may be a greater concern for rate ready utilities than for bill ready utilities.
- An 810 amount can be positive or negative but in this case, it needs to be negative in order to be a credit.

An additional proposal was raised where the utility would calculate the credit (at ESCO request) and place it on the customer bill. Under the second approach, the utility would have the option of calculating the credit or processing 810 transactions from ESCOs. Since the utility, as biller, would have all the data necessary to calculate the credit, it would minimize the chance of an ESCO calculating it incorrectly.
- A means for the ESCO to inform the utility when to calculate and issue the credit as well as the period to which the credit should apply would need to be developed.
- Another EDI transaction would need to be modified to inform the ESCO of the credit amount.

Since the bill credit is low income issue and from a regulatory perspective is stayed, the discussion is essentially hypothetic. The Commission has to resolve issues first, so any development is conditioned upon the fact that a prospective Order might necessitate further changes.

TWG will work on development of a code for the ESCO bill credit in the bill ready model. The name assigned to the code will be "Low Income ESCO Bill Credit"
- For the rate ready billing model, more development is required in addition to the code.
- A process for when credits are received outside the bill window (or after an ESCO's last bill to a customer) will be necessary
  - Should the credit be placed on the next invoice or rejected after which the ESCO would send a check to the customer?
  - Adjustment codes may be necessary.

5. Utility Maintained Implementation Guides/Documents

The Workpaper was reviewed; it was suggested that rather than using a page number as a reference location, that a section reference would be more appropriate because the page numbers could change once all the utility-specific notes were removed. Further, once all the notes were removed, the remaining core EDI standards documents would stay "fresh" longer. It was noted that other utilities within and outside New York have similar or related documents. Examples will be forwarded to the BWG Chair and reviewed as a part of ongoing development. There was conceptual agreement among the Utilities, ESCOs and Service Providers that the concept of Utility Maintained Implementation Guides/Documents could be helpful.

There are other administrative issues surrounding the guides that need to be addressed.

- The guides would be made available on utility web sites but ESCOs thought having them available of the DPS web site (or having a link from the DPS web site) would be helpful.
- Rules and procedures regarding how much notice each utility would need to provide when proposing/making changes to their implementations would be needed. Utility Gas Transportation Operating Manuals (GTOPs) we seen as an existing New York process that could be adopted/adapted.

Technical Discussion

1. Technical work reflecting BW outcomes

    a.   TS867 Workpaper – Draft

The document was reviewed. There was a technical issue assigning the codes for low income. Other issues discussed:

- Block on account codes were changed – now conditional if 867 is being sent.
- NYPA Recharge NY Indicator – Yes or No. An explanatory paragraph was added.
- Utility Discount – nothing changed but some question whether it is necessary to indicate a delivery discount that is portable, i.e. provided whether an ESCO or the utility provides commodity.
- Current Electric Capacity Assignment – ICAP Tag – Added in the dates and future ICAP tag.

    b.   503 Transaction Development

The TWG Chair led the working group in discussion to develop a transaction to communicate historical full service billing amounts and the ESCO's billing amounts in response to a request from the ESCO serving the customer. ESCOs not serving the customer would receive a rejection but there is a need to allow for a former ESCO to receive the transaction for at least a month after service to the customer is concluded. An initial draft 503 will be prepared for the next meeting.

Various issues were discussed:

- 503 Pricing History – what would the rejection reasons be?
- When would the 503 be requested?
- An ESCO could be Active, Pending or Inactive
    - Would the request be invalid when the requesting ESCO is no longer ESCO of record?
- Problem from an EDI perspective on credit over a period of time – what if an ESCO only serves the customer for 11 months and doesn't ask for that transaction for the credit?
    - If the ESCO drops the customer prior to 12 months, are they still required to provide a credit?
- Are Customer Account Blocks relevant?
- Are there low income privacy issues here?
    - Is the ESCO still responsible to provide a credit if the utility is not able to inform it that the customer has low income status?
    - If the customer was already a customer, the ESCO has customer information but is that enough to remove the privacy issue?
- Should various data elements be required or optional?
    - ESCO Account Number
    - REFAJ

- o REF03 – Field U
- o Gas Pool Id
- o IGP rejection code

Finally, a name will be required for the transaction - Bill Amount History was suggested.

c.   Effective dates for the ICAP Tag

This needs to be firmed up – NYSEG RG&E can provide dates. Grid, Con Ed and Central Hudson need to do further research. Generally, current tags were more readily available than future tags.

2. Development of initial EDI filing due in late June.

Next week's meeting will be dedicated to the filing/status report. A draft should be circulated by Wednesday to the working group.

Establish date/time for next meeting

The next two meetings will be on 6/20/14 at 10 A.M. and 6/27/14 at 10 A.M. They will be a combined Business Working Group and/or Technical Working Group.
- The 6/20 meeting will be dedicated to development of the initial EDI filing due in late June.
- The 6/27 meeting will resume discussion of various business and technical matters.

Attendees

Mary Ann Allen – Integrys	Jeff Begley – Fluent Energy
Mary Do – Latitude Technologies	Tom Dougherty – ISTA
Giovanni Formato – Con Edison	Jason Gullo – National Fuel Resources
Jackie Hernandez – Con Edison	Donna Satcher-Jackson – National Grid
Gary Lawrence – Energy Services Group	Jennifer Lorenzini – Central Hudson
Janet Manfredi – Central Hudson	Mike Novak – National Fuel Gas
Patrice O'Connor – DPS	Jean Pauyo – Orange & Rockland
Debbie Rabago – Ambit Energy	Rich Riley – National Grid
Sergio Smilley – National Grid	Joann Seibel - Orange & Rockland
Jay Sauta – Agway Energy Services	Robin Taylor – DPS
Charlie Trick – NYSEG, RG&E	Cindy Tomeny – National Grid
Rick Tra – National Grid	Carol Teixeria – National Grid
Debbie Vincent - UGI Energy Services	Marie Vajda – NYSEG
Kim Wall – PPL Solutions	