Case No. 12-M-0476 et al. EDI Business Working Group (BWG)/ Technical Working Group (TWG) Final Minutes – August 10, 2018

Administration

- Review/Modify Agenda: The Draft Agenda was adopted with modifications changing the order of discussion items and dropping the Community DG EDI item.
- The Draft Minutes from the 7/13/2018 meeting were adopted as final without modification.
- DPS Staff Remarks: None.

Regulatory Update

The BWG Chair provided an update on matters in Case No. 18-M-0376 and the informal process that has been underway concerning cyber security matters reviewing items related to EDI that were discussed during the July 26th and 27th stakeholder meeting in Albany. A revised Self-Attestation form has been issued as is due August 24, 2018. A revised version of the Data Security Agreement is scheduled to be released next week; it will be due by the end of August.

Proposed New EDI Transaction – Sync Lists

ESCO currently get sync lists (non-EDI files containing a list of all of the ESCO's current customers) from utilities to compare to ESCO system records; often via download from a password secured area on the utility's web site. To minimize the number of electronic touchpoints between the utility and ESCOs, the working group is investigating whether a transaction be designed to replicate the sync list. If successful, utilities would have the option to discontinue provision of their current non-EDI files.

The TWG Chair noted that current EDI transactions are at account level and a sync list is not at account level. The EDI 140 – Product Registration could work structurally but data needs to be added. There was discussion regarding this transaction and how frequently ESCOs obtain sync lists. Some thought the UBPs required that sync lists be provided once a quarter. The BWG Chair suggested that EDI sync lists could potentially be available more frequently sign it would be provided as a response to an ESCO request. The current lists are pushed to ESCOs. It was agreed that consultation with Staff on the UBP issue was a reasonable next step.

The workpaper for this meeting was based upon National Fuel's and Con Ed's sync lists – other utilities will be included in the workpaper for next meeting.

GISB EDM Discussion

A matter of discussion in the cyber security stakeholder discussions, i.e. what is the "industry best practice" for encryption has been sent to the EDI Working Group. As an initial matter, "industry" was defined as the "Retail Energy Choice" industry.

The Technical Operating Profile (TOP) EDI Standards Guide sets forth New York's Electronic Delivery Mechanism (EDM). In the initial TOP (Version 1.0), the EDM was set to GISB 1.4. In TOP Version 1.5 – page 10 footnote clarified that while GISB 1.4 is the standard, use of GISB 1.5 and 1.6 are permissible in New York.

Mary Do (Big Data Energy) provided a presentation outlining the evolution of the GISB EDM focusing up data security and encryption developments. GISB 1.6 added SSL, GISB 1.8 added use of a Digital Signature of Response on EDM on a mutually agreed basis and GISB 1.9 mandates Digital Signature of Response on EDM. The presentation stated that GISB 1.4's underlying components have been hacked and the customer data is susceptible to "man-in-the-middle" attacks, along with several other vulnerabilities. With respect to the best practice of encryption, Do noted that most retail markets use GISB 1.6. Do also noted that Texas is considering move to GISB 2.0 which requires digital signature and a few more header elements, such as reference number.

The BWG Chair asking for perspective from ESCOs and EDI service providers concerning their operations in other retail choice markets. Kim Wall (Hansen) recommended going to GISB 1.6 in New York since a majority ESCOs and EDI providers have this capability already and then move GISB 2.0 sometime thereafter.

Do noted that the wholesale gas industry was looking to move to GISB 3.0 and the BWG Chair noted that FERC was set to adopt GISB 2.0 as a regulation applicable to interstate pipelines for EDI.

The BWG Chair recommended that all parties (some ESCOs do EDI in-house, most ESCOs use EDI service providers) investigate their current capabilities with regard to implementing GISB 1.6 as a standard for New York. Additionally, parties should investigate whether adopting GISB 2.0 as Texas is considering would be more cost effective than a two-step process (1.4 to 1.6 followed by 1.6 to 2.0) in terms of upgrade costs and resources for testing.

The will be more discussion at next meeting.

814HU Errata

The positions for the N3 and N4 segments in the 814HU IG have been incorrect since 2006. The workpaper shows modified pages with the correct positions. If there are no objections, the modifications will be posted as an Errata and will be part of next filing with Commission.

Updates to EDI Implementation Plan(s)

a. Current EDI Standards Matrix

The BWG Chair reviewed the matrix noting that changes reflecting NYSEG/RG&E's non-implementation of 814C AMT*7 (permissible because they provide UBR billing) would be reflected at the next meeting. No further changes were provided during the meeting.

Other Business

None.

Establish Date/Time for Next Meeting

The next meeting combined BWG/TWG meeting is scheduled for Friday 9/7/2018 at 10 AM.

Attendees

Bianca Marine – O&R	Debra Croce – EC Infosystems
Julie Goodchild – Direct Energy	Kris Redanauer – Direct Energy
Gary Lawrence – Energy Services Group	Tom Rankin– Marketwise
Eric Heaton – Con Edison	Liz Ciborowski – NYSEG/RGE
Jim Wade – Customized Energy Solutions	Samantha Curry – Starion Energy
Kim Wall – Hansen Technologies	Barbara Goubeaud - EC Infosystems
Amy Delooza – Agway Energy	Mike Day – IGS
Barbara White – Ambit Energy	Mike Novak – National Fuel Gas Dist.
Matthew Stauble – ATMS	David Parnell Direct Energy
Pete Foster – NYSEG/RGE	Rebecca Sweeney – DPS Staff
Christina Binmore – XOOM Energy	Travis Bickford – Fluent Energy
Jeff Begley – NOCO	Angel Alvarez – Con Ed
Angela Schorr – Direct Energy	Janet Manfredi – Central Hudson
Nicole Baker – National Fuel Gas Dist.	Chris Gauch – National Fuel Gas Dist.
Mary Do – Big Data Energy Services	Emilie Cimoli – Clean Choice Energy
Jennifer Lorenzini – Central Hudson	John Holtz – NRG
Ester Pesach – EmPower Energy	Stacy Rantella - NEMA
Debbie Rabago – Ambit Energy	