

New York EDI Working Group Update to REMS Forum

TO: REMS Forum Email List
FROM: Michael Novak – Chair, New York Electronic Data Interchange Working Group
DATE: August 20, 2014
RE: EDI WORKING GROUP UPDATE & FEEDBACK REQUEST

We wanted to give everyone an update on the progress we've been making in the EDI Working Group and a preview of what we plan to file in October. More importantly, we would like receive some feedback on several important design decisions so that if/when they are included in the Initial Report on EDI Standards Development to be filed with the Commission on October 23, 2014 ("October Report"), no one will be surprised.

First, the progress report – we've identified data items/groupings/information that were directly identified in *Order Taking Actions To Improve The Residential And Small Nonresidential Retail Access Markets* issued on February 25, 2014 in Cases 14-M-0476 et. al. ("2/25 Order"), and those that indirectly support requirements in the 2/25 Order and other EDI items. Further, we've prioritized the items as follows:

Priority 1 – on track for October Report

- Enrollment Rejection Codes
- ICAP Tag
- Meter Numbers & Number of Meters
- Account Settlement Indicator
- NYP&A / ReCharge NY Indicator
- Utility Discount Indicator
- Industrial Classification Code
- Tax Exempt Status
- Customer Supply Status

Priority 1a – items that have been Stayed or are related to those items

- Energy Related Value Added Service ("ERVAS") Indicator & Nature of Service
- Low Income Status
- ESCO Bill Credit

Priority 2 – items not required in 2/25 Order but related to Priority 1a items

- Utility Full Service Billing Amounts

Priority 3 – other potential EDI items not required in 2/25 Order but relevant to EDI standards/ERVAS

- NYSERDA Historical Usage Request
- Net Metering

While it is possible that an Order resolving the items stayed in the April 25, 2014 *Order Granting Requests For Rehearing And Issuing A Stay* ("4/25 Stay") could be issued prior to the October Report, such an Order could change the EDI requirements from the 2/25 Order – and therefore our next steps. In consideration of this possibility, the EDI Working Group has not attempted to fully design EDI

transactions for these items. As of this date, it appears unlikely that EDI transactions addressing the Phase 1a items will be included in the October Report. Regardless, conceptual discussions have taken place for these items within the EDI Working Group.

FEEDBACK REQUESTS

- 1) **Priority 1 – Utility Discount Indicator** – The EDI Working Group is designing a “Yes/No” Indicator which would be limited to non-residential customers and would exclude circumstances where all customers in a service classification receive the same discount. In response to the indicator, the ESCO would contact the utility (or the customer) to obtain the details of the discount in a non-EDI format, e.g. an email message. The working preference is to indicate a discount only in two cases: 1) when the utility discounts the commodity and 2) when a utility discounts delivery contingent upon purchase of commodity from the utility. Portable delivery discounts (those that the customer would receive without regard to whether it purchases commodity from the utility or an ESCO) would not be reported.

FEEDBACK REQUESTED – Is this an acceptable approach or is the indication of portable delivery discounts essential to the competitive market (if so, why)?

- 2) **Priority 1 – NYPA / ReCharge NY Indicator** – The EDI Working Group’s preference would be to provide this information in a non-EDI format, e.g. a web posting on each utility’s web site identifying the ReCharge NY customers in their service territory or an offline report available from the utility upon ESCO request. Given that there are only approximately 700 accounts state-wide participating in the ReCharge NY program, EDI is not a very efficient solution for these transactions and would require significant resources to accomplish this task. Further, not every utility keeps the ReCharge NY information in their customer information system; due to the low number of accounts in some territories ReChargeNY customers are billed manually. This would complicate EDI mapping and possibly require modifications to utility systems.

FEEDBACK REQUESTED – Is a non-EDI approach acceptable for this ReCharge NY Indicator (if not, why)?

- 3) **Priority 1a - ERVAS Indicator & Nature of Service** - The 2/25 Order states “EDI standards must be modified to allow the ESCO to provide information identifying whether the customer is purchasing an energy-related value-added service and the nature of that service”. While the EDI Working Group could design a transaction to exchange these items, it would **prefer to defer this requirement until there is more known on how the data would be used as well as a better definition of ERVAS**. EDI is best suited to communication of discrete, well defined and somewhat predictable purposeful pieces of information; the “nature of that service” is ill-defined and essentially freeform. While systems modifications could be made, there appears to be a risk that further evolution of ERVAS could make such modifications obsolete. Testing of such EDI transactions could therefore be wasteful to utilities and ESCOs alike. The EDI Working Group anticipates its concerns will be addressed in Case 14-M-0101 - Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision and therefore, EDI development should be deferred until a better understanding of the information requirements surrounding ERVAS is available.

FEEDBACK REQUESTED – Is temporary deferral of ERVAS items an acceptable approach? If not, why?

- 4) **General – Utility Maintained EDI Guides** – The existing EDI Standards consist of Implementation Guides, Data Dictionaries and Business Process documents. Throughout, they contain notes specific to individual utilities that describe specific elections within the standards or implementation notes. In many cases these notes have grown stale over time or become obsolete. Currently Commission action is required to change these notes. While these notes can and will be refreshed as a part of the current process, they will start to grow stale once the Commission approves the new revised EDI Standards. The EDI Working Group recommends that utility specific notes be stripped from the EDI Standards documents and relocated to utility-specific EDI guides. **Each utility would maintain its own guide to supplement the EDI Standards guides.** The utility-specific guides would be maintained/modified to keep them “fresh” and would be available on utility websites and ideally via links from the DPS EDI web site. Collectively, the EDI Standards and Utility Maintained EDI Guides would represent the most current implementation for each utility. It is believed that this approach will help utilities and EDI Service providers more efficiently test and implement the EDI Standards.

FEEDBACK REQUESTED – Is the approach of instituting Utility Maintained EDI Guides to supplement the EDI Standards guides worthwhile? If not, why and what alternative approach would you propose?

- 5) **Priority 2 – Utility Full Service Bill Amounts** - The 2/25 Order states “Specifically, we require that ESCOs serving customers participating in utility low income assistance programs must do so with products that guarantee savings over what the customer would otherwise pay to the utility. To comply with this guarantee, an ESCO must be able to compare actual customer bills to what the customer would have been billed at the utility’s rates and, on at least an annual basis, provide any required refund as a credit on the customer’s bill. Alternatively, ESCOs may also provide these customers energy-related value-added services that are designed to reduce customers’ overall energy bills as described above. If an ESCO cannot or will not comply with these conditions, it can choose not to serve customers participating in utility low income assistance programs or HEAP.”

While this requirement has been Stayed, the EDI Working Group has been analyzing the data requirements and believes that it **may be useful to give consideration to determining an efficient manner by which to provide utility full service amounts to ESCOs.**¹ ESCOs are in control of the timing² and non-utility components of the calculation but under utility combined bill implementations, the end result of the calculation will need to be communicated to the utility and presented on the bill to the customer.

¹ While the Order discusses the bill credit in terms of a low-income consumer protection, the Working Group recognizes that some ESCOs offer “guaranteed savings” products to customers of any income level and therefore, could be interested in obtaining full service utility amounts. As such, the EDI Working Group does not intend to limit provision of this information to customers participating in utility low income assistance programs or HEAP.

² The EDI Working Group believes some ESCOs might compute customer credits on a schedule, e.g. once or twice a year, while others might compute credits on account anniversary dates. Further, credits might be due when a customer terminates service with an ESCO.

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There is no EDI development requirement in the 2/25 Order but depending upon feedback, the Working Group could develop a range of proposed EDI or non-EDI solutions from which utilities could choose to implement at least one of the solutions. Note that a non-standard outcome, where each utility provides that data in a format most compatible with their system capabilities, is a potential outcome if the feedback doesn't provide a clear direction.

FEEDBACK REQUESTED – At a high level, the EDI Working Group would like feedback upon whether utility full service billing amounts should be provided monthly³ or for a range of months upon ESCO request. Also, is there a preference for a standardized file format (EDI or non-EDI via a web site) or an account lookup over a web site patterned after the Historic Bill Comparison available/under development but oriented towards ESCOs?

Since ESCOs can choose not to serve customers participating in utility low income assistance programs or HEAP, please indicate whether you anticipate your need for utility full service bill amounts to compute bill credits will be frequent, occasional or never.

A couple of workpapers discussed by EDI Working Group concerning the Utility Maintained EDI Guides and ERVAS concerns/questions are attached to provide further background on the proposed direction for those items.

Please provide your feedback on these proposals by September 4, 2014 to novakm@natfuel.com. It would be helpful if the subject line on the email message was **NY EDI FEEDBACK RESPONSE**. The responses will be compiled and reviewed by the EDI Working Group.

If you have any questions, please send me an email or call me at (716) 857-7884.



³ Under this scenario, the utility would automatically provide the monthly full service billing amount to the ESCO as a part of the billing process, for example.