Case 12-M-0476, et. al.
EDI Business Working Group (BWG)/
Technical Working Group (TWG)
Draft Minutes – June 17, 2016

Administration

- Review/Modify Agenda: The Draft Agenda was adopted.
- The Draft Minutes from the 6/10/2016 EDI Business Working Group (BWG)/Technical Working Group (TWG) meeting were adopted as final name correction modification.

Regulatory Update

- Nothing new to report. The TRO on the Resetting Order is still in place.

6/30/2016 EDI Report

- The BWG Chair reviewed EDI Change Index posting showing the list of EDI Standards documents to be included in the next EDI Report and the redline document page numbers that contain proposed changes.
- The EDI Working Group plans to file modified EDI Standards documents on June 30, 2016. Other than the 814HU IG and 820 IG, the proposed EDI Standards documents changes were identical to those referenced at the 6/10/2016.
    - All Working Group members were asked to review each of the draft documents and forward any necessary corrections to the BWG Chair.

814C REF~TD Segment proposal re: PERIC code

The BWG Chair reviewed a workpaper showing an edit to 814C Scenario 2A discussed at the prior meeting. There were no additional changes.

EPA Credit Processing

a. 820 Changes

The BWG Chair reviewed a workpaper developed from discussion at the 6/10/2016 EDI Working Group meeting describing all of the EPA Credit Scenarios. The document was broken into four basic scenarios:

i) EPA Credit received from current ESCO
ii) EPA Credit received from previous ESCO
iii) EPA Credit adjustment (to increase credit) received from previous ESCO
iv) EPA Credit adjustment (to decrease credit) received from previous ESCO

Within each scenario, the Default Response, based upon the billing model employed by the current ESCO (and where applicable, the previous ESCO) as well as optional Utility

Responses (in response to ESCO requests) were identified. Each of these lead to a contingent action based upon whether the funds were available to offset the bill credit.

With respect to funds available to offset the credit, this generally was meant to describe an ESCO's POR stream from which the utility would offset the credit amount. If the POR stream was insufficient or non-existent, other means to fund credits upstream of drawing down upon the performance mechanism, e.g. invoice payments, wire transfers, etc. were among the means by an ESCO could fund the credit. Rejection of a credit request for insufficient funding was not a final action; an ESCO could resubmit the credit request upon remedying the funding. The general concept is to provide some flexibility so that use of performance mechanisms were a last resort, i.e. the preference is to fund credits as a matter of routine business.

It was noted that the Commission has issued a whitepaper (currently out for comment and reply) that will address matters such the amount of performance guarantee required, acceptable performance mechanisms, credit limits, the party responsible for holding the bonds, etc. in a forthcoming Order. For now, the EDI Standards to be filed on June 30, 2016 are based upon Orders issued to date and Staff guidance; to the extent the Order requires further changes to the EDI Standards changes will be developed by the EDI Working Group.

- **EPA Credit received from current ESCO**

Eric Heaton (Con Ed) asked how a utility's system should respond if an EDI transaction with multiple credits totaling $200 was received but the POR stream only had $150 available; should the utility process some of the credits or could it reject all credits in the EDI transaction. After some discussion, rejecting all the credits in the transaction was seen as a more appropriate EDI response but it was noted that utilities, depending upon the ESCO's overall credit standing (e.g. if a parental guarantee were in place), could accept and process credits that were technically unfunded.

Sergio Smilley (National Grid) asked if thresholds on credits coming in could be set for ESCOs or if the programs processing could utilize a hard coded amount. Administrative controls, such as limits to ensure credits are valid amounts seem reasonable. While controls are technically possible, further regulatory guidance might ultimately answer this question.

With regard to ECB and Dual billing scenarios, the BWG Chair stressed that Utility Option alternatives were dependent first upon whether the utility system could provide the alternative means of processing the credit and second upon whether the ESCO requests the alternative means. Otherwise, the default response, i.e. the utility rejecting the credit (if sent) and the ESCO providing the credit directly to the customer (either as a bill credit or an offset to a past due amount) would prevail.

The final case was where the ESCO billed customer during the period (some or all months) for which the credit applies but the customer is now on utility combined billing with the same ESCO. Based upon Staff guidance if the ESCO is using utility consolidated billing service, it appears as if the utility is obligated to put the credit on the bill. This might create the potential for an undue POR retention credit but developing a revised calculation could be too complex given that this circumstance should be relatively rare. If the incidence level is higher than expected, the fix may be regulatory in nature. At this point, the EDI Working Group will not revise the retention credit calculation in response to this concern.

- **EPA Credit received from previous ESCO**

While the billing model utilized by previous ESCO is a consideration, it can be trumped by the current ESCO billing selection. If the utility does not have a current billing relationship with the customer, it is functionally equivalent to a customer leaving the service territory; the utility cannot issue a bill credit. As a result, the credit transaction is rejected and the customer is instructed to provide the credit directly to the customer.

It was also noted that if the customer is currently a full service customer of the utility, from the customer's perspective the bill is a combined bill and the utility should include the credit on the bill.

- **EPA Credit adjustment (to increase credit) received from previous ESCO**

In this scenario, the intent is to adjust a previously issued credit. Continuity with the means by which the credit was previously issued is important; to the extent the same bill credit process can be maintained, it should be. For example, if the utility issued the credit, it should issue the credit adjustment unless it cannot because the customer billing relationship has terminated. A note to this effect will be included in the Business Process Document.

- **EPA Credit adjustment (to decrease credit) received from previous ESCO**

As with adjustments to increase credits, continuity with the means by which the credit was previously issued is important; to the extent the same bill credit process can be maintained, it should be.

The primary difference when issuing a decrease to a previously issue credit is that it can be described as a reversal to a reversal. In effect though, it can also be thought of as billing an additional amount. As such, the POR stream plays a different role. While credit decreases process through POR should be assessed retainage, if no POR is in place the utility (if it issues the credit) could employ pay-as-you-get-paid to process the remittance.

Other

- Sergio Smilley asked how bankruptcies would impact the process; under such scenarios they change account numbers and would logically reject credits for the old accounts. The BWG Chair suggested that what a bankruptcy court would order might not neatly align with the process rules and that the EDI Working Group isn't in a position to design for that scenario.
- The BWG Chair reviewed an updated 820 IG workpaper showing proposed changes to the RMR Remittance Advice Accounts Receivable Open Item Reference segment. APP to EPA changes in the RMR04 and RMR05 segments were addressed.

- Based upon offline discussion, the 820/810 TDS UBR issue was determined to be less significant than previously discussed. Marie Vajda (NYSEG/RG&E) is in agreement that Central Hudson's URR examples that will be added to the 820 IG will work for UBR also.
- The BWG Chair reviewed a workpaper a workpaper showing additional language added to the 820 Business Process document to explain high level EPA Credit processing matters and the impact of EPA Credit adjustments under both the UBR and URR models.

b. 503 Changes

A Gary Lawrence (ESG) discussed the proposed changes to AMT*CX - Actual Total ESCO Charges and the AMT*T3 ESCO Supply Charges segments in the 503 IG. In both cases, the proposal is to change the Accept Response from "Required" to "Conditional" where the condition is that the utility issued a consolidated bill to the customer. The EDI Working Group accepted the changes.

The last proposed change in the workpaper, to the REF Reference Identification (Bill Option) segment, added ESCO Combined Billing (code ESP) as a potential response. A proposal to add a code "NONE" to reflect the current billing status was rejected because it was determined that such a response was better provided outside the LIN loop. The business purpose, to give the ESCO advanced warning that utility billing was not available to process the credit, was seen as valid however. Mary Do (Latitude) will develop a new segment to be added to the 503 transaction similar to the REF~1P segment in the 814HU Response to describe the current billing status and/or provide additional information to the ESCO. A workpaper will be provided for the next meeting.

c. 814C Changes

The BWG Chair reviewed a workpaper showing modifications to the 814C REF Reference Identification (Reject Response Reasons) segment related to processing EPA Credits. The code, IF (insufficient funds), was added and the existing ECB code was repurposed from ESCO Combined billing to identify all cases where the current ESCO's billing option precludes processing of an EPA Credit. When the ECB code is provided, REF03 will be required to provide further explanation.

There was some discussion as to whether corresponding changes should be made to the 810 EDI transaction for the UBR model. The 814C is used when the ESCO issuing the credit is no longer serving the customers, so the 814C modifications address that UBR in that case. If the current ESCO issues the credit, since most of the time the current ESCO charges on bill should be larger than the credit amount, the utility could use administrative discretion to deem the credit sufficiently funded, i.e. the funds for the offset will be available. Use of the A13 code with a supplemental note may be sufficient to address rejections for this scenario. Marie Vajda and Charlie Trick (NYSEG/RG&E) will investigate and provide changes, if necessary.

d. Other

Another UBR 810 processing consideration, i.e. if/how to process individual items when an ESCO sends both current charges and an EPA Credit in the same transaction and one or the other fails, was discussed. Both NYSEG/RG&E and National Grid clarified their systems would reject all items in the 810 transaction, i.e. consistent with their current system rules, processing is done on an "all or nothing" basis. It may be appropriate for UBR utilities to note this in the EDI Guides.

The EPA Credit Scenario table will be added to the 820 Business Process document with referencing notes added to the 810 UBR and 814C Business Process Documents.

Other Business

The issue of determining the process by which a new EDI Service Providers would become qualified as an "experienced" EDISP will be considered by the EDI Working Group at the first working group meeting after the 6/30/2016 has been filed.

Establish date/time for next meeting

The next meeting will be a combined BWG/TWG meeting on Friday 7/22/2016 at 10 AM. The meeting will have a shortened agenda focused on the items to be included in the 6/30/2016 EDI Report.

Attendees

Adam Powers – Ethical Electric	Jasmine Thom – CES
Barbara Goubeaud – EC Infosystems	Jean Pauyo – O&R
Barbara White – Ambit	Jeff Begley – NOCO
Charlie Trick – NYSEG/RG&E	John Cooney – National Grid
Cindy Tomeny – National Grid	Kim McNary – Ambit
Debbie Rabago – Ambit	Kim Wall – PPL Solutions
Debbie Vincent – UGI Energy Services	Kris Redanauer – Direct Energy
Elois Anderson – National Grid	Marie Vajda – NYSEG/RG&E
Elorita Martinez – National Grid	Mary Do – Latitude
Eric Heaton – Con Ed	Mike Novak – National Fuel Gas Dist.
Ethan Kagan – Direct Energy	Rock Carbone – Agway
Ewen Ng – ERTH Corporation	Sergio Smilley – National Grid
Gary Lawrence – Energy Services Group	Tom Dougherty – Marketwise
Honor Harley – Accenture	Tracie Gaetano – IGS
Jennifer Lorenzini – Central Hudson	