Case 12-M-0476, et. al. EDI Business Working Group (BWG) Draft Minutes – May 30, 2014

Administration

- Review/Modify Agenda: The Draft Agenda was adopted unmodified.
- Review of Draft Minutes: minutes from the May 16, 2014 BWG meeting were reviewed and no changes were suggested. The final minutes will be posted on the EDI Working Group web page.

Business Working Group (BWG) Discussion on Implementation Guide Language

1) NYPA/Recharge NY

- Integrys said that they get a monthly spreadsheet from RESA that lists all Re-Charge customers by utility. If this spreadsheet isn't confidential, Integrys will share it with the BWG.
- O&R proposed new language for the Implementation Guide (shown below) which should be reviewed by each company's legal staff:

This will indicate if a customer is a participant of the Recharge New York program offered by the New York Power Authority (NYPA), or if the account receives any other type of NYPA power. The utilities will provide this indicator unless the account is billed outside of the utility's billing system.

2) Utility Discount Indicator

• BWG attendees were previously instructed to have the draft verbiage for the Implementation Guide reviewed by their attorneys. The Chairs did not hear from anyone so the language below will be passed on to the Technical Working Group (TWG) to use in the Implementation Guide:

This is required for non-residential customers and not intended for residential customers. <u>It is not intended for NYPA-related programs including ReChargeNY</u>. The Indicator is intended to differentiate a specific customer from other customers who are similarly situated but do not receive a discount. For example, if every customer within a service classification received the same discount, there would be no need to indicate a discount.

3) Tax Exemption Indicator

- ConEd had this language reviewed by its attorneys and they are fine with the language.
- This language below will be handed off to the TWG for the Implementation Guide:

The Utility Tax Exempt Status signifies the existence of exemptions and/or certifications, if any, held by the utility, that are used to bill the customer for utility services. The indicator is informational only; the utility's exemption is not transferable to the ESCO to bill the customer for ESCO services. The ESCO should not rely upon the utility's information for billing purposes and should contact the customer to obtain necessary information consistent with the requirements of the New York State Department of Taxation & Finance and any applicable laws.

• Con Ed, O&R and Integrys will have a discussion offline regarding the identification of tax districts by Con Ed and O&R. O&R says they do provide the tax district information in the HU.

Discussion

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1) Reject Reason Codes (continued)

• The BWG is concluding that there was a drafting mistake in The Commission Order because the customer block code already exists.

2) Low Income Enrollment Status (continued)

- Low income issues were stayed by the Commission. LuAnn Scherer has asked for comments as to which approach the parties to this proceeding prefer: the customer privacy approach (customer will inform the ESCO of their low income status), or the efficiency approach (the utility will inform the ESCO regarding the customer's low income status).
- If the efficiency approach is adopted, we will have to assume that ESCO contracts have not been updated to reflect privacy concerns. Letter would go out from the utilities and customers would be responsible for contacting their ESCO regarding their low income status. The utility would have to send a notification to the ESCO (unsolicited) when a customer is enrolled which would show the customer's low income status.
 - ESCO would like to know upfront, before they market to a customer, if the customer is low income.
 - o Information could be transmitted pre-enrollment via the 814 transaction.
 - Post-enrollment, the ESCO could issue the same request and in fact, this may be the normal course of action in response to the initial letter the customer would receive pursuant to the Commission's Order.
- On the technical side, the TWG stated that the 814 response would be required and that it would be a "yes/no" response. Currently the 814 HU has no data and if we added this new information then the business practices would have to be changed.

3) Utility Full Service Billing Amount History/ESCO Bill Credits

- A workpaper was sent out to the BWG from National Grid regarding a 503 transaction.
- According to the Commission Order, ESCOs would look at the past 12 months of billing history, total the charges, and then compare the total to what full service customers would have paid if the charges were higher, a credit would be issued for the low income customer.
- A question was raised as to how utilities would provide the billing histories to ESCOs. This could be an optional transaction or the customer could provide the information to the ESCO. Another option would be to have an EDI transaction to address this.
- National Grid (NG) commented that the 503 transaction is designed to provide pricing history. NG proposed using the 503 transaction because they were concerned about the number of updates that would have to be done in the 867.
- Exiting bill-ready EDI transactions might be suitable as a starting point for the ESCO Bill Credit; even for Rate Ready systems. There is also an unpublished 812 transaction that might work for the ESCO Bill Credit.
- A collaborative meeting dedicated to this issue, as part of the discussion of low income issues, is needed and there needs to be clarification from DPS staff.

4) Utility Maintained Implementation Guides/Documents

- There are specific utility notes in the Guide regarding how each utility does certain transactions.
- Stale notes should be removed and there are two alternatives for how to proceed:
 - o The notes could be updated and would be left in the Guide

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- Notes could be scrubbed and each utility would maintain its own notes in separate documents
- Under the separate document approach, there could be links to the DPS website that would go to each utility's guides and it would be the responsibility of each utility to keep their guides up-to-date.
- PPL commented that if we are going to do this, there should be a standard format for each transaction that the utilities would fill in with their unique information.
 - Tables within the guides reference the standard EDI document, page number and utility specific note might be useful for cross-referencing purposes.
- National Fuel commented that since the changes would affect ESCO implementations too, there
 would have to be some kind of advance notice to the ESCOs as changes occur in the utilities
 guides.
- Under this alternative, the Implementation Guide would still be on the DPS website and parties would have to adhere to it, but there would be individual utility supplements.

Technical Working Group (TWG) Discussion

1) Technical work reflecting BWG outcomes

 PPL didn't have anything specific for a TWG discussion. PPL will put together a workpaper for the next meeting for discussion. If PPL has questions, they will go on the BWG discussion for the June 6, 2014 meeting.

2) Development of initial EDI filing due in late June

• There will be a discussion among the Chairs during the week of June 2nd as to what should go into the June 25, 2014 filing. NFG has agreed to put together the first filing.

Next Meeting

The next meeting will be on 6/6/14 at 10 am and will be a combined BWG/TWG meeting where the first half of the meeting would be for the BWG and the second half would be for the TWG.

Attendees:

Diane Beard—National Grid	Jeff Begley—Fluent Energy
Dee Davis—Integrys Energy	Tom DoughertyISTA
Joe Falcon—Ambit Energy	Giovanni Formato—Con Edison
Jason Gullo—National Fuel Resources	Gary Lawrence—Energy Services Group
Mary Do—Latitude Technologies	Donna Satcher-Jackson—National Grid
Jennifer Lorenzini—Central Hudson	Janet Manfredi—Central Hudson
Veronica Munoz—Accenture	Mike Novak—National Fuel Gas
Jean Pauyo—Orange & Rockland	Debbie Rabago—Ambit Energy
Marie Vajda—NYSEG/RG&E	Sergio Smilley—National Grid
Joann Seibel—Orange & Rockland	Jay Sauta—Agway Energy Services
Rich Spilky—Integrys Energy	Charlie Trick—NYSEG/RG&E
Jim Stauble—Accenture	Kim Wall—PPL Solutions
Carol Teixeria—National Grid	Debbie Vincent—UGI Energy Services
Patrice O'Connor—DPS Staff	Craig Weiss—National Grid