

Case 12-M-0476 NY PSC EDI

Agway Energy Services would prefer the new proposed segments be added to the 814 HU transactions. This would be less invasive to our backend system.

Central Hudson would prefer to use the 867HU for the new required segments. The 867HU is an already established transaction and would be easier to modify than creating new inbound and outbound transaction sets. The ESCO's currently ask for historical usage pre-enrollment, so it only makes sense to include the new data along with the historical usage if it is available.

ConEd

In regards to the new EDI entries required by order 12-M-0476, Con Edison would prefer to utilize 814 responses. However, recognizing that this may be a concern for some, our second preference would be to utilize the already existent 867 HU file.

Fluent Energy

Our preference at Fluent Energy would be that the information would be in a separate PTD loop in the 867 HU transaction.

Integritys would prefer to have the account level information on the 867HU and not the 814 HU Response just because that is more in line with other markets.

That being said, if it was included on the 814Response it would not be that big of a problem for Integritys because we would need to process the same information on the Enrollment Accept transaction and we can use the same code to process it on the 814HU response transaction.

Ista

I am in favor of the 867HU model with the new PTD*FG loop for all data elements that are related to the prospecting and pricing of customers. I believe that all of the priority one data elements fall into this category, including the low income indicator.

Reasons for the adoption of this solution:

The 867HU with the PTD*FG loop is already being used for some of the new fields in other states so it would minimize the amount of design and implementation time and effort for Suppliers, EDI providers and Utilities that operate in Multiple states using each state's standards.

Keeping the data in the 867HU allows the Prospecting/Pricing process to be accomplished with a single request from the Supplier and a single response transaction to pass data. This means the current processes for collecting and forwarding HU data must be enhanced, but already exist to pass data to Suppliers.

Splitting the new data across multiple transactions may require the supplier to make multiple requests and result in receiving the data back via multiple transactions causing either multiple

interface files to be sent to the supplier, or for new functionality to be created to receive and store the multiple transaction data until all the information has been collected and consolidated prior to presenting the data to the Supplier systems.

The Low Income indicator which has been discussed as an outlier from the 867HU functionality, is actually an important field to help suppliers decide if they are going to prospect and price the customer based on their business model of either serving or not serving Low income customers. As such it should be delivered to the Supplier with the other prospecting and pricing information.

So far the only data that seems appropriate for the 503/503X transaction discussion is the pricing history data.

Adding data elements to the 814HU response would complicate this implementation by adding significant logic to a second EDI transaction.

No other states currently return data elements in the 814HU response file, so this would further distance the NY standards from the national/generally accepted EDI standards and business practices, making it more difficult to adopt future enhancements.

As the group has discussed, adoption of this 867HU solution will require some changes in how NY Utilities currently support blocks on Customer HU data requests or situations where new accounts have no HU data to return, (i.e. current process does not return an 867HU, only an 814HU response. New process would return an 867HU with perhaps only the PTD*FG loop as well as the 814HU response).

National Fuel

Mike think we'll be indifferent except for the Enrollment Rejection Code which we think belongs in the 814 HU Response. For two level blocks, if it is in the 867 PTD*FG loop and there's a historical block, they'll never find that out. I'll explain more on Friday.

National Grid

National Grid (NMPC, KEDLI, and KEDNY) Supplemental Data EDI X12 Recommendations

National Grid technical background:

National Grid's EDI large scale billing system currently processes EDI transactions in multiple states with multiple companies in each state with unique requirements for each company operating under the National Grid parent company. In addition to the complex billing system, National Grid also has the challenge of processing the EDI X12 translation mapping through two different mapping interfaces. For NY, NMPC will need to process the EDI X12 mapping through GENTRAN and for KEDLI and KEDNY will process the EDI X12 mapping through ESG. National Grid will consolidate the mapping applications in the future when the technical resources are available. A large portion of National Grid's EDI technical resources are deployed to convert KEDNY into its billing

system at the moment. The remaining National Grid EDI technical resources are deployed to address NY PSC requirements.

Any change made to National Grid's EDI billing system has to take into consideration impact to the code in the billing system for each state and each company. Most critical is when there's an architectural change to the existing process in the system. National Grid's system is built to track one business transaction for one EDI transaction set. Where each transaction set has its own accept response and unique reject response reason. Deviation from the relationship of one unique business transaction to one EDI X12 transaction set is a billing system architectural change. The cost and risk to National Grid's ability comply with changes and perform EDI business after go-live is very high in this case.

The current multi-state, multi-company 814HU/867HU process is considered a complex process at National Grid.

National Grid preferred recommendation:

National Grid provides 814HU/867HU gas and electrical historical usage data at NMPC and 814HU/867HU Gas Profile data at KEDLI and KEDNY. The preferred and best solution is to create a new transaction set (503X?) to provide the supplemental information. This is the lowest risk and lowest cost option. This option will:

- Put the new supplemental information into a new transaction set with its own business response accept/rejection rules consistent with the current billing system processing architecture and other NY EDI transaction sets.
- It'll remove testing and go-live risk impact to the existing 814HU/867HU transaction set for NY companies and other companies outside of NY.
- Since the 503X is bi-directional transaction it'll reduce the need for another transaction to request the data. The 503X can request the supplemental data and have the data returned in the 503X response.
- Allows ESCO to not have to make any changes to their existing 814HU/867HU process if they don't want to participate in the low income customer market and also the option to not build the 503X.
- Allows ESCO to selectively request supplemental data without historical usage or gas profile data.
- Provide acceptable testing and go-live risks to National Grid's EDI process while complying with the NY PSC mandate to provide the supplemental data

Alternate compromise recommendation 1:

National Grid accepts the alternative recommendation to put all the new supplemental data into the 814HU transaction set and send this information in an 814HU response by default, regardless if the response to the original 814HU request (for historical usage data or gas profile data) from the ESCO results in an accept or a reject response from the National Grid.

Alternate compromise recommendation 2:

In response for the need by ESCO to use existing 814/867 transactions, National Grid proposes the alternative recommendation to put all new supplemental data into the 867HU as a new PTD*FG loop which will be triggered by a new supplement data indicator in the 814HU LIN05 Add Product/Service ID segment and the 867HU BTP04 Add Report Type Code segment. The advantage to this option is:

- Allows the use of the 814/867 transaction set
- Allows ESCO to not have to make any changes to their existing 814HU/867HU process if they don't want to participate in the low income customer market
- Allows ESCO to selectively request supplemental data without historical usage or gas profile data
- Recognize the supplement data as a separate EDI business transaction with it's own request and accept/reject response rules consistent with all states National Grid current do business in
- Does not impact both the current NY 814HU/867HU historical usage data or the gas profile data transaction set and its business rules
- Provide acceptable testing and go-live risks to National Grid's EDI process while complying with the NY PSC mandate to provide the supplemental data

NYSEG/RG&E

Below is what IT has sent to me. NYSEG and RG&E can see benefits for both.

Our position is that we can work with either of these two options.

We are interested in what the other Utilities are thinking and what they may have to offer when they send their responses.

I believe you said you were compiling the responses from everyone.

They may bring up something that could sway our choice between these two options.

You know the saying "...two heads are better than one..."

- Option 1 (use existing 814) would be the more straightforward, least amount of time to implement solution
 - We would need to modify logic due to the need to send the new info even if no history
- Option 2 (503 transaction) likely the better long-term solution
 - More flexibility moving forward
 - More incremental time to design, develop, test and implement (new transaction, maps, etc)
 - We don't use the 503 today, so some implied risk to add

Orange and Rockland Utilities prefers the use of the 814 HU Response to provide the EDI items listed in the Order on pages 46-47 and as set forth as Priority I items in the EDI Working Group documents. Because the 814 HU Response is always sent, even when there is no usage, this transaction would require only that the new information be added.