

**Case 12-M-0476, et al.**  
**EDI Business Working Group (BWG)/**  
**Technical Working Group (TWG)**  
**Draft Minutes – July 22, 2016**

**Administration**

- Review/Modify Agenda: The Draft Agenda was adopted.
- The Draft Minutes from the 6/24/2016 EDI Business Working Group (BWG)/Technical Working Group (TWG) meeting were adopted with a change to address errata on page 2 and a correction to the attendance list.
- Two work papers for discussion at today's meeting were circulated via email this morning and will be posted to the website on Monday.

**Regulatory Update**

On July 15, 2016, the Commission issued *Order Regarding the Provision of Service to Low-Income Customers by Energy Service Companies* ("Low Income Moratorium Order") in Case 12-M-0476, et al. Kirsten Ewing (DPS Staff) provided a brief presentation covering the highlights of the Order which was put in place to provide protections for low income customers. The Order directs a moratorium on ESCO enrollments of new Assistance Program Participant (APP) customers and on renewals of existing APP customers. Directives to utilities and ESCOs, as well as the timeline, were reviewed.

The BWG Chair noted that the Order changes the EDI Working Group's priorities; that Low Income Moratorium Order matters would take priority over the items in the EDI Report that was filed on 6/30/2016. An extension of the testing deadline for APP credit testing will be filed; a preliminary version has already been provided to DPS Staff for their review.

**Review of Implementation Plans for Current EDI Standards**

Market Change Implementation Matrix – placeholder rows were added for the 6/30/2016 EDI Report but no specific benchmark tasks presented themselves because this report primarily refined items from the 1/29/2016 EDI Report. EDI Working Group members should send their suggested benchmark tasks suggestions to the BWG Chair for discussion at upcoming meetings.

EPA Support Matrix – two new rows were added to track utility support plans for 503 transaction segments AMT Monetary Amount (ESCO Supply Charges) and AMT Monetary Amount (Utility Supply Comparison Charges). Only the NFG column was populated; other utilities were not ready to provide an update/response at this time.

**EDI Report – Recap of Filed Report- Website Updates**

The 6/30/2016 EDI Report is available from the working group web page. No comments have been filed yet so the report changes are on track to become part of the EDI Standards by July 30. The BWG Chair observed that reports have been filed about every 6 months but they can be filed more frequently if needed.

## **Low Income Moratorium Order EDI Impact re: EDI Changes and Issues**

A workpaper highlighting the items from the Low Income Moratorium Order that were relevant to EDI was reviewed. The concept of using account blocks to generate rejections of EDI enrollment requests for APP customers was discussed as well as the process of notifying ESCOs if enrollment blocks were being placed on existing ESCO customers. When a block is placed on the account (due to customer APP Status), the customer is no longer eligible to be served by an ESCO. The ESCO should drop the APP customer at the termination date of the ESCO-customer contract at which point they would return to utility service.

The BWG Chair observed that the requirements of the Low Income Moratorium Order could be categorized at what needs to be done now (within 60 days of the Order's effective date) and what needs to be done on an ongoing, business as usual, basis.

Additionally, while the Low Income Moratorium Order is very specific on the use of customer blocks and the EDI response, each utility needs to analyze their block structure. Some may need to add a new block to distinguish when the account is blocked because it is an APP account from the cases where the block has been placed at customer request.

### **Discussion:**

- Mary Agresti (National Grid) asked when the enrollment comes in from a Community Choice Aggregation (CCA) for an APP customer can it be treated differently than it would be for the existing programs? Additionally, if the CCA is serving APP customers can they continue to do so? The BWG Chair thought the answer may be CCA-specific since CCAs have the option to serve APP customers or not. The utility would have to send a notification to the CCA's ESCO that the customer is not eligible to be served by an ESCO under the existing non-CCA program. Prior to CCA startup, the CCA ESCO, based upon its service preference, would enroll or not enroll the customer in the CCA. After startup, the utility could notify the CCA ESCO as it would any ESCO and that ESCO would make its drop decision on a basis consistent with the CCA's APP customer service preference.
- ESCOs will initially be notified of a customer blocks via secure flat files. In terms of ongoing changes, e.g. in response to HEAP winter enrollments, an EDI transaction could be developed or secure flat files could be used.
  - The 814C transaction may need a new segment to incorporate the notification into EDI.
- Jean Pauyo (O&R) commented on the blocked account lists pointing out that utilities need to protect APP customer information and privacy. To do this, it is necessary to send a list of all accounts that have a block including ESCO customers who put blocks on as a slamming protection as well. The ESCO will contact the customer to find out if they are APP and then drop them at the end of the contract.
- Eric Heaton (Con Ed) noted that for CCAs, there is a need to distinguish between customers who place a block because they do not want to participate in the CCA and those who have a block placed on the account due to APP status. Con Ed has one block on the account and in a case where the CCA wishes to serve APP customers when the CCA enrollment is received, the APP account can't be enrolled. Should a new code or flag field in this situation be needed? The BWG Chair replied that each utility has to investigate this issue and some may need to add the new code or flag to process enrollments properly.

- The utility will place a block on all APP customer accounts. When marketing to the customer, the ESCO should the customer if they are enrolled in a utility low income program. If the ESCO doesn't ask, the customer enrollment will be rejected so asking prior to enrollment is more efficient.
- Janet Manfredi (Central Hudson) observed that when the CCA enrollment is received, if the customer has a block on the account, the utility rejects the enrollment but questioned how would the utility know if it's a CCA customer block or APP moratorium block? The BWG Chair noted that as discussed before, this is a programming/systems issue. NFG, for example, would rely upon the gas pool ID from enrollment to distinguish whether the enrollment was for a CCA customer pool or the pool in its existing program to determine whether/how moratorium initiated blocks would be processed. Again, each utility has to investigate issues such as this and some may need to add the new code or flag to process enrollments properly.
  - Based upon their experience with CCAs, both ConEd and NYSEG have recognized a need to distinguish CCAs from existing program aggregations.
- The Low Income Moratorium Order provides that utility communication to the ESCO of which accounts ESCO are no longer eligible to service in a can be done in a secure spreadsheet flat file.
- John Holtz (NRG) requested that utilities provide separate customer block lists for each ESCO. No utility disagreed with this request.
- Mr. Holtz questioned if the ordering clause timelines were in conflict because if the utility has up to 60 days to inform the ESCO which customers have blocks placed on their accounts and ESCO have within 60 days of the Order's effective date to drop the identified customers with expiring contract from ESCO service, there is no time the ESCO needs to react or process the utility provided information. The ESCOs might need to send multiple drop requests, possibly in one batch, potentially overloading systems. Based upon discussion, utilities agreed that ESCOs would have to be notified of all blocks, including those not related to APP Status, in order to preserve the customer privacy structure intended by the Low Income Moratorium Order. As such, it's reasonable that the ESCO might want to contact the customer to verify APP Status before dropping the customer.
  - The potential timeline conflict may be unintended; clarification (formal or informal) may help resolve this matter.
  - Craig Wiess (National Grid) questioned whether the ESCOs would be dropping all customers on the list. The BWG Chair said not necessarily; only the month-to-month customers would be dropped immediately. ESCOs are not obligated to send back longer term customers until their contracts expire; this is part of the reason the ESCO needs some time to respond to the list provided by the utility.
- Jason Gullo (NFR) asked when the ESCO processes the customer block list to determine which customers have APP status, what happens if the customer doesn't know? The BWG Chair suggested that ESCOs should work with each utility to see if there are questions that would provide a positive indication, e.g. did the customer receive a HEAP grant? Because the qualification parameters for utility low income programs are not universal, ESCOs should not presume that what works for one utility will work for others.
  - With regard to existing ESCO customers who will not reveal their APP status to the ESCO, e.g. for privacy reasons, the ESCO would be unable to determine they need to drop the customer.

Moving to the next two pages in the workpaper, the EDI Working Group reviewed the segments used to reject enrollments and verified for enrollment rejections, 1) EDI worked as described in the Low Income Moratorium Order that 2) no additional changes are needed. The utility will send an 814E reject response with a reason code CAB indicating the customer's account is blocked.

The final page of the workpaper dealt with the issue of modifications to the 814C transaction to communicate changes in customer block status on an ongoing basis, i.e. when a customer requests a block on the account or the utility places a block because the customer becomes an APP customer. The length of the moratorium was raised as a potential factor in determining whether an EDI change was worthwhile; the Low Income Moratorium Order is silent concerning an end-date. Some parties questioned whether other transactions will be affected (814HU, 867HU, etc...).

- The BWG Chair and Mary Do (Latitude) will put together a matrix to identify how each utility plans to implement the Low Income Moratorium Order.
- O&R and Direct Energy think EDI should be designed for a new code if necessary, and making this part of the matrix.
- Sergio Smiley (National Grid) asked if the potential 814C changes would be mandatory. The BWG Chair didn't think they would; if secured flat files work for some utilities and the ESCOs in their programs, then EDI may not be worthwhile.
  - This is an item to be included in the Low Income Moratorium Order matrix.

Finally, the BWG Chair asked if any parties believed that the Low Income Moratorium Order should not be the EDI Working Group's top priority or if the APP Credit testing extension request should not be filed; no one on the call disagreed with this direction.

### **EDI Testing - Qualification of new EDISPs**

Eric Heaton expressed a concern that the current EDI Standards Technical documents grant a new EDI Service Provider ("EDISP") "Established" status once they successfully implement for one ESCO. ConEd believes this may be premature and may give a false impression of the EDISP's experience. For example, an EDISP could handle one ESCO but the second ESCO overloads the EDISP's processing capabilities. ConEd suggests that an assessment of ESCO production capabilities, i.e. its ability to handle the amount of volume needed would be useful. Another measure might be the number of clients or customer volume base.

- The BWG Chair thought the ConEd's idea had merit but noted that whatever changes are made, they should not unduly restrict entrance into the EDISP market.

Gary Lawrence (ESG) asked if a utility in New York that doesn't use EDI today decided to start using EDI, would the rules that apply to ESCOs who use EDISPs apply to the utility. The BWG Chair said he believed the utility would be similarly situated but the results of testing might need to be submitted for approval to the Commission.

### **867 IU- Interval Usage**

Mr. Heaton explained that since ConEd will be implementing AMI for all customers, there will be interval data that could be provided by EDI. ConEd has researched other states (TX, PA) and found a comparable EDI transaction. Mr. Smiley asked if this would be a mandatory standard; the BWG Chair said no but it would be available to utilities that have a business need.

**Establish date/time for next meeting**

The next meeting will be a combined BWG/TWG meeting on Friday 8/5/2016 at 10 AM.  
The group decided after the next scheduled meeting, this may become a weekly meeting if needed until the Low Income Moratorium Orders are addressed.

**Attendees**

|                                       |                                      |
|---------------------------------------|--------------------------------------|
| Adam Powers – Ethical Electric        | Jean Pauyo – O&R                     |
| Amie Williams – Agway                 | Jeff Begley – NOCO                   |
| Barbara Goubeaud – EC Infosystems     | Jennifer Lorenzini – Central Hudson  |
| Barbara White – Ambit                 | John Cooney – National Grid          |
| Charlie Trick – NYSEG/RG&E            | John Holtz – NRG                     |
| Cindy Tomeny – National Grid          | Kim McNary – Ambit                   |
| Craig Wiess – National Grid           | Kim Wall – Hansen Technology         |
| Debbie Rabago – Ambit                 | Kirsten Ewing – DPS Staff            |
| Debbie Vincent – UGI Energy Services  | Kris Redanauer – Direct Energy       |
| Debra Crochie – EC Infosystems        | Mary Agresti- National Grid          |
| Donna Satcher-Jackson – National Grid | Mary Do – Latitude                   |
| Elois Anderson – National Grid        | Mike Novak – National Fuel Gas Dist. |
| Elorita Martinez – National Grid      | Mike Pawlowski – National Grid       |
| Eric Heaton – Con Ed                  | Rock Carbone – Agway                 |
| Eric Horleman - Aurea                 | Sergio Smilley – National Grid       |
| Ethan Kagan – Direct Energy           | Tom Dougherty – Marketwise           |
| Ewen Ng – EARTH Corporation           | Tracie Gaetano – IGS                 |
| Gary Lawrence – Energy Services Group | Travis Bickford – Fluent             |
| Janet Manfredi – Central Hudson       | Tyler Lones - Aurea                  |
| Jasmine Thom – CES                    | Veronica Munoz – Accenture           |
| Jason Gallo – NFG                     | Zoe Gaston - Aurea                   |