

Case 12-M-0476, et. al.
EDI Business Working Group (BWG) and
Technical Working Group (TWG)
Final Minutes – June 27, 2014

Administration

- Review/Modify Agenda: The Draft Agenda was adopted unmodified.
- The 6/13/2014 and 6/20/2014 Draft Minutes were reviewed and adopted as final.
- DPS – no remarks.

Commission Filing Recap

The Chair recapped the events since the initial review of the draft filing at the 6/20/2014 BWG meeting. The draft filing was forwarded to DPS Staff who after discussion with the Secretary, received guidance that the filing should be filed as a request for an extension. As a result, attorneys needed to be involved in the drafting process and the document needed to be filed one day earlier than anticipated. While the draft was reorganized and there were additional edits, in substance the filing was consistent with the draft reviewed by the BWG. The filing was a Workpaper for the BWG meeting.

NYSERDA Historical Usage Request

A Workpaper reviewing the recent history of the NYSERDA request was reviewed and DPS Staff provided additional background information. To expedite the request, the following was seen as necessary:

- NYSERDA would have to look like an ESCO (but not be an ESCO).
 - DPS Staff will send NYSERDA an EDI application and conduct Phase I testing.
- A new transaction would likely not be necessary, i.e. the 867HU would be suitable.
- NYSERDA would have to provide assurance to utilities that they have obtained customer authorization to request information analogous to UBP Section 4.B.1.
 - NYSERDA would have to agree to not use and otherwise protect any data in the 867HU for which they did not have customer authorization.
- Customer Account Blocks would prevent NYSERDA (as they would for any ESCO) from receiving information. To resolve blocks:
 - NYSERDA could ask customers to remove the block.
 - Customers could provide usage information to NYSERDA under current procedures.
 - Utilities and NYSERDA could work out an alternative means to provide the requested information.

Utilities would like an official document of some form, e.g. an official PSC letter or Order addressing what NYSERDA is allowed to request and do with the information it receives as well as related customer privacy matters.

It was noted that NYSERDA was requesting 24 months of usage information. In some cases, utilities only provide 12 months of usage information to ESCOs. Due to utility systems limitations, NYSERDA would most likely receive the same number of months as ESCOs from these utilities.

Both National Fuel (single commodity) and ConEd (dual commodity) indicated willingness to test with NYSERDA.

Interaction of Customer Blocks and Various Indicators

A Workpaper was reviewed and the Working Group's preliminary direction to add new items to the 867HU was discussed, particularly in the context of non-usage items. It was understood that to the extent a comprehensive block or HU block (at utilities with two-level blocks) was in place, non-usage items would be blocked along usage information in the 867HU. Blocking of some non-usage information, e.g. customer low-income status, was seen as problematic although it was noted that post-enrollment (but prior to initiation of service) the ESCO would receive the low income indicator as a part of an 814 transaction.

It was noted that a low income customer who is currently served by an ESCO who moves from one location to another does not necessarily change their low income status; at least some utilities would set up a new account number and will continue to code them as a low income customer.

The policies around customer initiated block were reviewed; i.e. the purpose of the block and what types of data should be blocked as well as what items belong in the transaction. Balancing the needs of ESCOs and customer privacy concerns was discussed. The possibility of the REV Case leading to other items like the non-usage items was also discussed.

Providing certain non-usage items as a part of the 867HU, whether or not a block was in place was discussed, but seen as undesirable. From a technical perspective, the problem with this process would be that it would be a partial rejection. EDI Systems typically don't work that way; transactions can't be split into two transactions (partially reject) to send some data through.

The discussion then moved on to other reasons (besides a Customer Block) an 867HU request could be rejected, e.g. no historical usage available (typical for a new account).

- It was suggested that the HUU (Historical Use not Available) be changed from a rejection reason to a status code. In this way, non-usage information such as low-income status could still be provided if no usage was available.

The alternative of creating a new EDI transaction to communicate some of non-usage information was raised – costs and benefits were discussed. No specific decisions were made but utilities will internally review their implementations to see if they have a preference for their systems.

An EDI Service provider noted that while it could move the data under any transaction, that ESCOs faced mapping and systems concerns too. ESCOs generally acknowledged the business logic behind this issue but are concerned that whichever way the transaction is developed, that it will work.

Business Discussion

1. Low Income Program/HEAP Customer Indicator

The BWG Chair observed that the discussion just concluded addressed this issue; the indicator will potentially fit into the 867HU or a new transaction.

2. Full Service Billing Amount History

The Minutes from the 6/13/2014 BWG were reviewed to recap the design considerations. The purpose of the transaction is to provide ESCOs with information necessary to calculate the credit. While the transaction is optional, the majority of utilities are in favor of this transaction. ESCO acceptance of the transaction is critical; there appears to be mutual benefit particularly if the ESCO believes it will be

serving significant numbers of low-income customers. Several ESCOs participating in the meeting indicated they would use the transaction. The BWG Chair felt it will be necessary to promote the transaction to a wider ESCO audience and planned to draft a description to be circulated within the ESCO community or at some future conference/meeting.

A question was raised asking whether an 810 transaction be used to communicate the utility full service bill amount to the ESCO. While this (or potentially other transactions) was determined to be a feasible, it might require ESCOs to track monthly amounts in their systems whereas the 503 transaction would provide up to 12 months of information in response to one request. There was some thought that the 503 might be better suited to rate ready implementations and a 810 approach better suited to bill ready situations, however, it appeared as if a 503 accommodates both scenarios.

There was some discussion of rejection reasons. The initial thought was that if an ESCO was not the commodity provider of record (or within an as yet unspecified window) that the request would be rejected. Since the ESCO may or may not know they'll need to calculate the credit (an existing customer could become qualified as low-income), the timing of the credit may not be predictable. Since the 503 would include up to 12 months of utility full service amounts and corresponding ESCO amounts for the requesting ESCO, the window could be 12 months. In other words, so long the requesting ESCO served at least one month during the past 12 months, they should receive the transaction response.

A question was raised as to whether the customer's utility full service amounts should be withheld if a customer block is in place. Historical Usage, for example, could be derived from full service amounts. The BWG will need to have further research done before it can answer this question.

3. ESCO Bill Credit Transaction

For rate ready utilities, use of an 810 transaction to communicate an ESCO bill credit to a utility was seen as a significant issue because it potentially involved development of "bill-ready type" business processes not likely available within their current systems. Upon review of the 2/25/2014 Order, it was determined that while provision of a means for the ESCO to provide a bill-credit to low-income customers was required, that means need not be EDI. Therefore, use of an 810 transaction to communicate the credit to the utility was not mandatory and other approaches such as utility calculated credits and/or non-EDI means of ESCOs communicating credit amounts to utilities were acceptable approaches under the 2/25/2014 Order. ConEd agreed to research and present a non-EDI approach.

As for the approach of having the utility calculate the credit, an instruction from the ESCO to the utility would likely still be necessary to indicate which months should be included in the calculation. EDI may be a reasonable means of communicating the instruction.

In all cases, the ESCO is in control of when the credit is to be provided to the customer, subject to utility processing lead times. Especially in the cases where the ESCO provides the credit amount, it will be responsible for the components of the calculation. In these cases, the utilities role is likely limited to processing the ESCO's credit instruction subject to timing considerations and standard data validation rules, as applicable.

4. Utility Maintained Implementation Guides/Documents

ConEd reviewed a Workpaper consisting of their 814 Change Request and Response Supplemental Information. They have a similar document on their web site (supplemental guidelines) for each transaction. The BWG noted that the concept of utility maintained guides did not necessarily imply one

comprehensive document – ConEd’s approach was a good example of how information to assist ESCOs in implementing the EDI standards specific to an individual utility’s system could be provided.

Technical Discussion

1. Technical work reflecting BW outcomes

The TWG Chair was unavailable for the meeting but BWG discussion during today’s meeting was instructive for 867, 503 and 810 transaction development.

Establish date/time for next meeting

The next meeting will be a BWG meeting on 7/11/14 at 10 A.M. addressing continues development of revised EDI Standards. There is no meeting on 7/4/2014 due to the July 4th Holiday.

Attendees

Mary Ann Allen - Integrys	Zeno Barnum – Hudson Energy
Diane Beard – National Grid	Jeff Begley – Fluent Energy
Mary Do – Latitude Technologies	Joe Falcon – Ambit Energy
Giovanni Formato – Con Ed	Jason Gullo - NFR
Christine Hughey- Constellation	Donna Satcher-Jackson – National Grid
Gary Lawrence – Energy Services Group	Jennifer Lorenzi – Central Hudson
Janet Manfredi – Central Hudson	Veronica Munoz - Accenture
Mike Novak – National Fuel Gas	Jean Pauyo – O&R
Debbie Rabago – Ambit Energy	Jay Sauta - Agway
Joann Seibel – O&R	Sergio Smilley – National Grid
Robin Taylor – DPS Staff	Carol Teixeira – National Grid
Cindy Tomeny – National Grid	Rick Tra – National Grid
Debbie Vincent – UGI Energy	Jackie Hernandez – Con Ed