

**Case 12-M-0476, et. al.**  
**EDI Business Working Group (BWG)/**  
**Technical Working Group (TWG)**  
**Final Minutes – November 14, 2014**

**Administration**

- Review/Modify Agenda: The Draft Agenda was adopted without modification.
- The 10/20/2014 Draft Minutes were adopted as Final without modification.
- DPS – no remarks.

**Review/Follow-up – October 23 Report filing**

No comments have been filed; we are waiting on Commission to take the next steps and there is a possibility of Commission action in the next couple of sessions. The BWG Chair noted that while he has received a few questions on whether the EDI Working Group should proceed with Phase 2 items, there's no reason to move forward on those items. It was also noted that Commission actions could potentially lead to a need for other EDI changes.

**Modifications to PSC EDI Web pages**

Pointing to the workpaper posted for the 9/12/14 working group meeting, the BWG Chair noted the Commission's EDI web pages needed to be refreshed, including elimination of some outdated items. He sought volunteers to work outside of the working group on a proposed set of changes which would be reviewed by the working group. The initial proposal would be to have one main EDI page providing an overview accessible from the Commission's A-Z Index. From the overview page, several other web pages would be linked and organized topically, e.g. Standards, Regulatory, Testing, Working Group, etc., to provide one-click navigation. Mary Do forwarded a link to the PAPUC EDI webpage that included ideas that may be worth considering for New York:

[http://www.puc.state.pa.us/utility\\_industry/electricity/edewg\\_files\\_for\\_downloading.aspx](http://www.puc.state.pa.us/utility_industry/electricity/edewg_files_for_downloading.aspx)

Suggestions for other sites that work well can be e-mailed to Mike.

**Modifications to Testing Procedures**

While the current testing rules have been in place since the initiation of EDI in New York, most utilities have been given an informal go-ahead by DPS Staff to streamline certain aspects of testing over the past several years. The BWG Chair suggested that the working group formalize what has been done so far and develop further suggestions to streamline EDI Testing. The revised testing procedures would be filed with the Commission (since they are changes to the EDI Testing Standards) so that streamlined testing could be employed, where appropriate, to test the changes filed in the October 23 EDI Report.

The BWG Chair noted that the October 23 EDI Report suggest batch testing of ESCOs with the same EDI Services Provider. Charlie Trick noted that NYSEG does a single test with 3<sup>rd</sup> party providers currently for the existing standards. If the provider has an issue with the ESCO, they handle it with them on the side.

In addition to batch testing, other streamlining suggestions were to give utilities discretion at the

transaction level to:

- Accept testing results for ESCOs from affiliated companies or to develop comprehensive tests that covered multiple implementations.
- Accept a test from a non-affiliated utility with a similar implementation provided that the utility receives attestation from the ESCO's EDI Service Provider and/or the other utility that the ESCO is functionally capable of the transaction.
- Allow ESCOs to pre-test before they've made a formal commitment to do business on the utility's system.

The BWG Chair asked EDO Service Providers about testing procedures in other states. Mary Do said that both Pennsylvania and Texas require full testing. She also suggested that NY Utilities be surveyed to determine which transactions are the most problematic for ESCOs that streamlined testing doesn't result in missing transactions areas that lead to implementation problems.

Moving on to Phase I Testing, currently conducted by John D'Aloia (DPS Staff), the BWG Chair wasn't sure if it still served a technical purpose in New York's mature EDI implementation but did note from a regulatory perspective that it was a key step in an ESCO being declared ready by DPS Staff to serve customers. It was noted that Phase I Testing checks the ESCO's ability to create the syntax necessary for EDI transactions; there's little point to Phase III testing of correct syntax cannot be provided by the ESCO. Donna Satcher-Jackson noted that an ESCO isn't sending data through correctly, this can take up a lot of time in the Phase III testing process.

The following are preliminary suggestions for Phase I testing:

- Staff could contract with an EDI Service Provider to provide Phase I testing services.
- Combine Phase I testing with Phase III testing.
- A single utility perform the Phase I testing with the ESCO (at the ESCO's request) and certify to DPS Staff if the ESCO had passed the test.
- The ESCO could conduct Phase I testing with an EDI Service Provider (other than its own provider) who certify to DPS Staff if the ESCO had passed the test.
- Status quo.

Donna Satcher-Jackson noted that she was concerned about utilities conducting Phase I testing. Mike Novak replied that he thought Phase I testing would have to be at the option of the utility. Particularly when there was a backlog of EDI work, it could be difficult for a utility to fit into its schedule.

Charlie Trick will put together workpaper for a streamlined Phase III proposal. He noted that NYSEG is bill ready, so rate ready utilities might have other concerns he wouldn't be able to address from experience.

The BWG Chair noted an email from National Grid regarding availability SEF files and other documents from the October 23 EDI Report. Mike Novak noted that the files are produced using the Foresight EDI Software tool which was not available to the working group. While some EDI Service Providers have the tool, he suggested that one option might be for DPS to obtain a license for Foresight. Gary Lawrence said that ESG has the tool and could create the files, but it is a large undertaking. It would be better to use the SEF files from the current standards as a starting point. Gary Lawrence will contact John D'Aloia to determine whether DPS has the SEF files and contact Kim Wall as well.

As for the other files, the BWG Chair noted that the EDI transactions described in the files aren't

officially adopted until the Commission issues an Order. While there could be some benefit to utilities to using the files to begin the work of modifying their back office systems to support the new EDI transactions, since the Commission Order could change the EDI transactions from what has been recommended, there is some risk to moving too fast. The Word files used to create the October 23 EDI Report to DPS Staff for safe-keeping.

Finally, the BWG Chair suggested that it would be good to convert the implementation timeline proposed in the October 23 EDI Report (6 months for utility/ESCO system upgrades and 2 months for testing) into calendar dates for planning purposes. Presuming the customary administrative steps to generate a Commission Order, the timeline would suggest an August/September 2015 go-live date. It was noted that the Commission could shorten the time line as well. The Chair noted that following Commission action, he would possibly use the REMS Forum email list again to communicate with ESCOs who are not tied into the regulatory process.

#### **Establish date/time for next meeting**

The next meeting will be a combined BWG/TWG meeting on Friday 12/5 at 10 AM. Likely topics will include addressing any follow-up questions from the October 23 Report, Test Plans and proposed changes to the Commission's EDI web site.

#### **Attendees**

Jay Sauta – Agway	Mary Do – Latitude Technologies
Jason Gullo – National Fuel Resources	Janet Manfredi – Central Hudson
Marc Webster – NYSEG/RG&E	Charlie Trick – NYSEG/RG&E
Jeff Begley – Fluent Energy	Sergio Smilley – National Grid
Donna Satcher-Jackson – National Grid	Christine Hughey - Constellation
Gary Lawrence – Energy Services Group	Tom Dougherty – Aurea Energy Services
Jennifer Lorenzini – Central Hudson	Debbie Rabago - Ambit
Jean Pauyo – O&R	Mike Novak – National Fuel Gas
MaryAnn Allen – Integrys	Kristen McFarland - IGS Energy
Robin Taylor – DPS Staff	