



July 26, 2016

Hon. Kathleen H. Burgess  
Secretary  
New York State Department of Public Service  
3 Empire State Plaza - 19th Floor  
Albany, NY 12223

RE: **Case 12-M-0476** – Proceeding on Motion of the Commission to Assess Certain Aspects of the Residential and Small Non-residential Retail Energy Markets in New York State.

**Case 98-M-1343** – In the Matter of Retail Access Business Rules.

**Case 06-M-0647** – In the Matter of Energy Service Company Price Reporting Requirements.

**Case 98-M-0667** – In the Matter of Electronic Data Interchange.

Dear Secretary Burgess:

On behalf of the New York Electronic Data Interchange (“EDI”) Working Group (“EDI Working Group”), an ad hoc working group consisting of personnel from utilities, Energy Service Companies (“ESCOs”) and EDI Service Providers pursuing development of EDI Standards, National Fuel Gas Distribution Corporation hereby submits a request to extend the deadline for testing and implementing EDI changes necessary to accommodate bill credits to Assistance Program Participants (“APP”). The Commission’s *Order Granting and Denying Petitions for Rehearing in Part*, issued and effective on February 6, 2015 (“Order”) in the above referenced cases directed development of such changes (hereinafter, “APP EDI Changes”) and a compliance filing within 60 days of the Order.<sup>1</sup> The Order further directed that any required testing by utilities and ESCOs must be completed, and the EDI transactions must be operational, within 120 days from the date of the compliance filing.<sup>2</sup>

The EDI Working Group submitted four requests to extend the date by which testing must be completed and the APP EDI Changes become operational first, from August 5, 2015 to December 3, 2015 and second, from December 3, 2015 to April 1, 2016, and third, from April 1, 2016 to May 16, 2016, and fourth from May 16, 2016 to August 1, 2016. In all cases, you granted the request for extensions, most recently on May 16, 2016.

It does not appear as if an Order authorizing provision of APP Credits will be in effect as of the August 1, 2016 date. More importantly, the Commission’s *Order Regarding the Provision Of Service to Low-Income Customers by Energy Service Companies*, issued and

---

<sup>1</sup> “Any EDI changes that may be necessary to accommodate bill credits shall be developed by the EDI Working Group and will be effective upon the filing of a compliance filing that includes the appropriate EDI documentation within 60 days from the date of this Order.”, Order, p. 8.

<sup>2</sup> Id.

Hon. Kathleen H. Burgess

July 26, 2016

Page 2 of 2

effective on July 15, 2016 ("Moratorium Order") necessitates a reprioritization of systems resources for both ESCOs and utilities. Upon consultation with Department of Public Service Staff, it has been determined that an additional extension of approximately 90 days reasonably balances the potential regulatory timeline with the more immediate compliance requirements for both utilities and ESCOs resulting from the Moratorium Order.

In order to promote the fair, orderly and efficient implementation of the requirements of the Moratorium Order, the EDI Working Group believes the retail market would be best served by a fifth extension to December 1, 2016 for testing and implementation of the APP EDI changes.

Please contact the undersigned at (716) 857-7884 if you have any questions regarding this filing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael E. Novak", is placed over a large, diagonal red "DRAFT" watermark.

Michael E. Novak  
Assistant General Manager  
National Fuel Gas Distribution Corporation  
6363 Main St.  
Williamsville, NY 14221-5887  
[NovakM@natfuel.com](mailto:NovakM@natfuel.com)