

**Case No. 12-M-0476 et. al.**  
**EDI Business/Technical Working Groups**  
**Workpaper - Reducing Time between EDI Standards Filings and Implementation - 5/22/2015**

*Excerpt from Order in Case 97-G-1380 - In the Matter of Issues Associated with the Future of the Natural Gas Industry and the Role of Local Gas Distribution Companies, ORDER CONCERNING RELIABILITY, (Issued and Effective December 21, 1999), pages 4-5.*

We adopt the recommendation of the Communications Working Group that LDC procedures be codified in a Gas Transportation Operating Procedures Manual. Many utility tariffs currently contain some general procedures while specific operating details are frequently communicated informally during LDC-marketer meetings or individual conversations. As a result, in most instances, there is no one complete source of written procedures to which marketers and direct customers may refer for information that may affect the day-to-day delivery of gas supplies and for responses to special delivery requirements during critical periods. This can lead to misunderstandings and confusion that may affect system reliability or lead to penalties.

We have already approved the use of a Gas Transportation Operating Procedures Manual for Consolidated Edison Company of New York, Inc. and New York State Electric & Gas Corporation." In doing so we recognized the desirability of a procedure that allows these LDCs flexibility to adapt their operating procedures to changing market conditions, we attached the following conditions:

- (1) the Gas Transportation Operating Procedures Manual (three copies and any subsequent revisions thereto) must be on file with the Commission,
- (2) the Gas Transportation Operating Procedures Manual must be provided to all marketers and direct customers,
- (3) the LDC must provide the Commission and all marketers and direct customers with notice of proposed changes to its Gas Transportation Operating Procedures Manual 30 days prior to their effective date,
- (4) while the Gas Transportation Operating Procedures Manual may include factors that affect the amount of the customer's bill, such as rates, balance tolerances and charges, these must continue to be stated in the company's tariff.

We will apply these conditions to all LDCs. To the extent that existing utility tariffs contain provisions that are inconsistent with the recommendations contained in the Communication Working Group Report, the LDCs shall be required to file tariff revisions to conform with the recommendations of the working group report.

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**Expedited EDI Filing to Implementation Process - Design Considerations**

- Routine modifications/updates to existing EDI Standards and optional elements of the EDI Standards should proceed under a lighter/expedited regulatory process.
  - As a general rule, new initiatives of major impact, e.g. those from the REV Case, should not qualify for the lighter/expedited regulatory process until they become mature, settled matters.
- Modifications/updates to EDI Standards supporting new regulatory requirements and/or mandatory business practices do not become mandatory until the Commission issues an Order, i.e. they do not qualify for under the lighter/expedited regulatory process.
  - Mandatory EDI Standards, e.g. those that support APP Credits, do not become mandatory until the Commission issues an Order or has specified, in advance, a date by which a date by which the underlying business practice/regulation becomes mandatory.
- In the EDI Standards modifications/updates reports it files, the EDI Working Group, in consultation with Staff, will endeavor to set testing and implementation dates, when necessary, for the EDI Standards changes that proceed under the lighter/expedited regulatory process.
- If any party with a significant business interest disagrees with the assignment of a component of EDI Standards modifications/updates report to the lighter/expedited regulatory process, it should first raise this issue with the EDI Working Group and/or Staff to seek necessary changes. Preferably, this would occur during the drafting stage, i.e. before the report was filed and in any event, no less than 15 business days following the date the report was filed.
  - Requests to remove items from the lighter/expedited regulatory process should be filed with the Secretary, preferably by the EDI Working Group in response to a request that could not be resolved.

Additionally:

- (1) The ~~EDI Working Group should file its EDI Standards Reports-Gas Transportation Operating Procedures Manual (three copies and any subsequent revisions thereto) must be on file with~~ through the Commission's electronic filing system,
- (2) the ~~EDI Standards Reports-Gas Transportation Operating Procedures Manual~~ must be made available provided to all ~~marketers-ESCOs~~ and direct customers via Web Posting on the EDI Working Group's web page,
- (3) the ~~EDI Standards Reports should include an effective date, no less than LDC must provide the Commission and all marketers and direct customers with notice of proposed changes to its Gas Transportation Operating Procedures Manual 30 days prior following to their effective filing date and in absence of advise otherwise, testing and implementation of EDI changes no less than 120 days following the filing date,~~
- (4) ~~while the Gas Transportation Operating Procedures Manual may include factors that affect the amount of the customer's bill, such as rates, balance tolerances and charges, these must continue to be stated in the company's tariff.~~