

August 19, 2016

**VIA EMAIL**

Honorable Kathleen H. Burgess, Secretary  
State of New York  
Public Service Commission  
Three Empire State Plaza  
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.**

**REQUEST FOR EXTENSION OF TIME**

Dear Secretary Burgess:

On behalf of The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”), KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”), and Niagara Mohawk Corporation d/b/a National Grid (“NMPC” and collectively with KEDNY and KEDLI, “National Grid” or “Company”), I am writing to seek an extension of time for KEDNY, KEDLI and NMPC to comply with certain of the requirements stated in the New York Public Service Commission’s (the “Commission’s”) *Order Regarding the Provision of Service to Low Income Customers by Energy Service Companies*, issued July 15, 2016 in the above-referenced proceedings (the “Order”).

Ordering clause No. 1 of the Order directs the utilities, including National Grid, to begin placing a block on all affordability assistance program participant (“APP”) accounts, preventing those accounts from being enrolled with an energy service company (“ESCO”), within 60 days of the effective date of the Order.<sup>1</sup> The term “block” is not defined within the Uniform Business Practices governing interactions between utilities and ESCOs. Notwithstanding, National Grid intends to comply with this requirement by

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<sup>1</sup> Order at p. 18.

developing new electronic data interchange (“EDI”) and billing system functionality that, once implemented, would have the ability to automatically reject APP customer enrollments with an ESCO.

The Order directs utilities to begin rejecting APP enrollments with ESCOs through an EDI transaction (the “EDI Rejection”) beginning 60 days after the effective date of the Order (*i.e.*, on or before September 13, 2016). Compliance with the requirement for an automated EDI Rejection will require the development of new EDI functionality and changes to National Grid’s CRIS and CSS billing systems. Given the need to develop and implement new EDI functionality, perform necessary modifications of two separate billing systems (CRIS and CSS), and perform required testing prior to implementation, the Company respectfully submits that the automated EDI Rejection for National Grid will require an additional 90 days to implement (*i.e.*, extending the deadline for EDI Rejections to December 12, 2016).

During the interim period between the sixty-day deadline contemplated in the Order and the Company’s proposed extended deadline of December 12, 2016, the Company believes a manual process could be implemented to void ESCO enrollments with APP customers not eligible for enrollment. This ad hoc manual process would continue until automated EDI Rejections are implemented, resulting in a consistent customer experience. The Company believes that the interim manual process would provide essentially the same protection for APP customers as the automated process.

Pursuant to the Order, the Secretary is authorized to extend deadlines set forth therein.<sup>2</sup> Granting the Company’s request to extend the deadline to implement automated EDI Rejections, coupled with the Company’s efforts to manually perform APP customer rejections during the interim, will permit National Grid to develop and test the required EDI and billing systems functionality, support a consistent customer experience and be protective of APP customer interests. For these reasons, National Grid respectfully requests an extension of the implementation timeline for automated EDI Rejections to December 12, 2016.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/ Jeremy J. Euto

Jeremy J. Euto

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<sup>2</sup> Order at p. 19.