STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on July 31, 2002

COMMISSIONER PRESENT:

Maureen O. Helmer, Chairman

CASE 98-M-0667 - In the Matter of Electronic Data Interchange.

ORDER APPROVING ELECTRONIC DATA INTERCHANGE
STANDARDS REGARDING REMITTANCE AND ACCOUNT
ASSIGNMENT AND MODIFYING THE APPLICATION
ADVICE STANDARDS AND ALL TYPE 814 STANDARDS

(Issued and Effective July 31, 2002)

BACKGROUND AND SUMMARY

　　　　The implementation of Electronic Data Interchange
(EDI) in New York requires the development, approval,
programming and testing of a variety of EDI data standards. As
each subsequent data standard is developed, new issues of
compatibility emerge, in some instances warranting the
modification of previously approved standards to ensure the most
efficient overall operation of EDI processes. By this order, an
820 Remittance Transaction Standard[1] and an 248 Account
Assignment Transaction Standard[2] are approved. In addition,
modifications to the existing 824 Application Advice Transaction

---

[1]　The 820 Remittance Transaction Standard is comprised of two
documents: Remittance Advice Business Processes for Utility
Consolidated Billing Models and TS820 Remittance
Implementation Guide.

[2]　The 248 Account Assignment Transaction Standard is comprised
of two documents: Account Assignment for Consolidated Billing
Business Processes (All Consolidated Billing Models) and TS248
Account Assignment Implementation Guide.

Standard which were necessary to accommodate consolidated billing practices are also approved.[3] Further, consistent with the Order issued on May 29, 2002 in this proceeding,[4] all previously published 814 Transaction Standards have been modified to incorporate an additional data segment (Utility Account Number for ESCO/Marketer). Version 1.1 of those standards will be published and made available on the Commission's web site by August 7, 2002, coincident with a notice of availability to the active parties in this proceeding.

In compliance with the order issued on April 4, 2002 in this proceeding,[5] the EDI Collaborative filed the implementation guides and business process documents for the 820 Remittance Standard on June 14, 2002 and the 248 Account Assignment Standard on July 1, 2002. Version 1.1 of the 824 Application Advice Standard was filed by Staff. In addition, a Notice Soliciting Comments on Staff's proposal to add an additional data segment to all 814 data standards was issued on May 29, 2002.

Comments were solicited on the initial and modified standards by notices published in the State Register on May 15, 2002 (820 Remittance), May 29, 2002 (824 Application Advice and all 814 standards), and June 5, 2002 (248 Account

---

[3] Version 1.0 of the 824 Application Advice Transaction Standard was previously adopted in this proceeding. Case 98-M-0667, In the Matter of Electronic Data Interchange, Opinion No. 01-03, (issued July 23, 2001). The modifications approved herein are incorporated in Version 1.1 of this standard.

[4] Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Adopting Reinstatement Transaction Standard and Test Plans for the Account Maintenance Transaction Standard,(issued May 29, 2002), at page 9.

[5] Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Adjusting Workplan and Deadlines for the Proceeding (issued April 4, 2002).

Assignment). Comments were received from Consolidated Edison
Company of New York, Inc. and Orange and Rockland Utilities,
Inc. (collectively, "Con Edison"), New York State Electric & Gas
Corporation (NYSEG), Niagara Mohawk Power Corporation (Niagara
Mohawk) and SmartEnergy. Due to the technical nature of many of
the comments, all comments received have been summarized in
Appendix B attached to and made a part of this order. Appendix
B also includes a brief statement as to how the matters raised
have been resolved. Only the issues regarding broader policies
are discussed at length herein.

DISPOSITION OF COMMENTS

820 Remittance and 248 Account Assignment

The Remittance business processes were designed to
ensure that the customer receives prompt credit for payment and
that the non-billing party receives timely notification that a
payment has been received. Similarly, the Account Assignment
transaction is used by a billing party to notify the non-billing
party that it will no longer be responsible for collecting
payments and/or maintaining receivables for an account of the
non-billing party. This notification would normally be sent
when a consolidated billing relationship for an individual
customer has ended because, for example, the customer requests a
change in bill option or has switched to a different commodity
supplier. The Account Assignment transaction may also be used,
when the payment method is "purchase receivables with recourse,"
to notify the non-billing party that amounts past due for a
customer are now considered to be "uncollectible" and
responsibility for future collections efforts for these amounts
is being assigned to the non-billing party.

The focus of the majority of the comments of the
parties filed on the proposed Remittance and Account Assignment
standards pertained to business processes, either documented or

implied, that are the basis for the content and structure of the technical Implementation Guides. Specifically, concerns were raised pertaining to the designation, interpretation and modification of various Uniform Business Practices for Billing and Payment Processing applicable to the standards.

The proposed Remittance Advice Business Processes and TS820 Implementation Guide are applicable only to Utility Consolidated Billing models. In those models, the Remittance transaction is used by the Utility, as the billing party, to transmit information regarding customer payment activity to the ESCO/Marketer when funds are owed to the non-billing party. In any consolidated billing model, the billing party is expected to have the most recent information on an individual customer's payment activity because customers are directed to make payments on consolidated bills to the billing party and there will always be some lag between billing party receipt of a customer payment and notification of such receipt to the non-billing party.

In the proposed business process documents for Remittance and Account Assignment, various Billing and Payment Processing Practices related to exchange of payment data or the maintenance of balance information were either clarified or modified to accommodate electronic exchange of this data. The comments of the parties endorsed, opposed or sought further clarification of these recommendations.

In its comments, Niagara Mohawk endorsed the EDI Collaborative's recommendation that all excess amounts be allocated to the Utility for a number of reasons: "the payment could be in the form of a DSS allowance such as a Heap Grant, in which event any excess should be forwarded to the Utility for future distribution charges; the Utility is the provider of last resort [and] any excess amount should be maintained by the Utility; the customer may intend to pre-pay charges, especially elderly customers who temporarily relocate South in the Winter

months or college students." Similarly, Con Edison supported all of the recommendations and issues highlighted in the Business Processes document. Niagara Mohawk also expressed support for provisions that require the billing party and non-billing party to honor express payment allocations indicated by the customer, and along with SmartEnergy supported the proposal to eliminate the need for two notifications of the receipt of a customer payment.

SmartEnergy raises a concern that there is no EDI transaction available between the billing and non-billing parties to communicate billing amounts placed in dispute by customers. SmartEnergy also commented that the rule allowing the billing party to retain any payment amounts in excess of the amounts due as prepayments for future charges should only be applicable to the Utility Consolidated Billing Model. SmartEnergy also believes that the description of the process for treating unidentified payments is unnecessary. Further, SmartEnergy opposes language regarding the disposition of excess amounts and argues that such language should be restricted to the Utility Consolidated Billing Model. Finally, SmartEnergy objects to the assumption that a customer's action of mailing a payment to the non-billing party constitutes the customer's request to have the money applied to the non-billing account. Regarding account assignment, SmartEnergy again opposes language regarding the disposition of excess amounts and argues that such language should be restricted to the Utility Consolidated Billing Model.

Discussion

Based on the parties comments and the text of the proposed business process documents on Remittance and Account Assignment the Uniform Practices for Billing and Payment Processing is clarified or modified as follows. The Practices regarding customer instructions will apply to both billing and

non-billing parties and should take precedence over any other payment allocation scheme. With regard to the treatment of excess payments, the amount that is in excess of the amount due, in the absence of customer instructions, should be treated in the manner prescribed in the Practices regardless of which entity is the billing party, i.e. when the billing party (either Utility or ESCO) knows that the customer is on a deferred payment or budget plan, any excess payment amount should be applied to those plans. If they don't know or the customer is not on a deferred or budget plan, the billing party will apply the excess as a prepayment against their own future charges.

Further, in the absence of customer's instructions to the contrary, payments received by the non-billing party should be posted to the customer's account with the non-billing party. The arguments presented by the utility parties are persuasive that any other process would be too cumbersome, error prone and time consuming. Other alternatives would appear to substantially increase the risk that customer payments would not be credited promptly. Last, the current requirement for billing party notification to the non-billing party of receipt of customers' payments is revised to require only one notice instead of two.

To minimize confusion between the business processes for Remittance (which are applicable only to Utility consolidated billing) and those associated with Account Assignment (which are applicable to all consolidated billing models), the changes regarding the treatment of payments received by the non-billing party, customers instructions to the non-billing party and the application of payment amounts in excess of the balance due will also be included in the Account Assignment Business Process Document in addition to the Remittance Advice Business Process document. Following development of the business process and corresponding 810

Implementation Guide for ESCO Bill Ready billing, we expect the collaborative to file a revised Remittance Advice Business Process document which would accommodate all consolidated billing models.

The 820 Remittance Transaction Standard and the 248 Account Assignment Transaction Standard are adopted with modifications as discussed herein and as further described in Appendix B attached hereto and made a part of this order.

824 Application Advice Modifications

An 824 Application Advice transaction is used to respond to certain types of incoming EDI transactions when the structure of those transactions does not already provide for a response mechanism. The EDI Collaborative was directed to develop and file EDI data standards for several transactions that must be implemented to support consolidated billing. Coincident with the development of these new EDI standards, it is necessary to make corresponding changes in the 824 Application Advice transaction standard to enable parties to transmit responses rejecting, where applicable, these new transactions. Staff developed and distributed for comment its proposed modifications of the NY TS824 Advice Transaction Set Standard. Staff's proposal is modeled after the standard currently in use in the Mid-Atlantic States and recognizes responses rejecting the following new transactions: an 810

Invoice, an 820 Remittance, a 248 Account Assignment and a 568 Contract Management transaction.[6]

In their comments, parties expressed concerns about the business processes that were implied in the structure of the modified Implementation Guide regarding the actions to be taken by the recipient of a rejection notice and which errors in specific transactions should result in a rejection notice. Con Edison and NYSEG believe that it would be inappropriate to adopt revisions that assume business processes that have not yet been adopted in any Commission-approved document. Con Edison and NYSEG also seek clarification regarding the proposed modifications and suggest that further modifications to the 824 Application Advice standard will be necessary to accurately reflect business processes that have not yet been fully developed.

In the revised standard, new action codes were added that enable the sender (the entity rejecting a transaction) to prescribe how the recipient (the entity receiving the rejection notice) is expected to respond to the rejection notice. Essentially, the recipient is expected to either correct and re-send the transaction, or evaluate the error but not re-send the transaction. Con Edison believes this approach is "overly prescriptive" and suggests that "a neutral action code [would] allow both parties to identify that a discrepancy has occurred

---

[6] At the time Staff distributed its proposed revisions to the 824 standard, the TS810 Invoice standards for Utility Bill Ready, Utility Rate Ready and Single Retailer had been filed, the TS820 Remittance Advice and TS248 Account Assignment transactions were under development and were subsequently filed and are considered in this Order, and the TS810 Invoice for ESCO Bill Ready and the 568 Contract Payment Management Report transaction were under development and are yet to be filed.

and permit both parties to take action as needed in a form or manner suited to the circumstances and business practices."

Alternatively, NYSEG suggests that the language in the Implementation Guide regarding the use of action codes should be made more, not less, prescriptive. When the rejection notice indicates that an error should be evaluated but the transaction should not be re-sent (EV), NYSEG is concerned that the entity receiving the rejection notice "does not have any idea of what happened to the data provided in the original document." NYSEG concludes that this code "is apparently to be used only when an 810 is sent where the bill presenter or bill calculator [codes contained in the 810 transaction] does not match those of the bill presenter [in a bill ready scenario]." It suggests that the Notes section of Implementation Guide be revised to clarify the use of action code "EV" by replacing some proposed text and also adding new text. NYSEG would also add new text prescribing the way the codes operate by stating that "the action code to be used is dictated by the processing rules (depicted in the gray box notes) of the TED02 element in the TED segment" and "[u]nless explicitly stated in that documentation, the action code (BGN08) will always be 82."

Discussion

Consolidated billing activities are time sensitive. The proposed "neutral action code" approach fails to recognize the efficiency benefits to be gained by an automated means for the initiator of the rejection notice to indicate what follow up actions should be undertaken. In addition, there are benefits to keeping New York's EDI system consistent with that of the Mid-Atlantic States when appropriate. Finally, leaving each Utility to develop its own approach to responding to such transactions cuts against the main goal of EDI which is to establish uniform and automated procedures to the extent possible. NYSEG's alternative approach which encompassed

revisions to both action codes and error codes will also be rejected at this time. If it becomes apparent to the parties that changes in the error codes or the association of a specific code with a specific transaction type are necessary or desirable, the parties should work collaboratively to fashion proposed revisions, potentially in a Business Process document that might be filed subsequently. Staff's proposed revisions to the 824 Application Advice Transaction Standard are approved with modifications as described in Appendix B attached hereto and made a part of this order.

Modifications to 814 Standards

The 814 Reinstatement transaction adopted in the May 29, 2002 order included a new segment "Utility Assigned Account Number for the ESCo/Marketer" which would be exchanged with the mutual agreement of the Utility and ESCO/Marketer. To maintain consistency with this approach across all 814 type standards, Staff had recommended that all 814 type technical documents be modified to add this segment. Con Edison filed comments supporting Staff's proposal. No comments were filed in opposition to the proposed modifications.

Discussion

The modification of the 814 standards previously published[7] is approved and new versions of these standards will be issued August 7, 2002 accompanied by a notice of availability to the active parties in this proceeding.

---

[7] Implementation Guides and Data Dictionaries for the TS814 Enrollment Request and Response, TS814 Drop Request and Response, TS814 Account Maintenance, and TS814 Consumption History Request and Response.

It is ordered:

      1. The 820 Remittance Transaction Standard and the 248 Account Assignment Transaction Standard are adopted with modifications as discussed herein and as further described in Appendix B attached hereto and made a part of this order.

      2. The 824 Application Advice Transaction Standard is revised as described in Appendix B attached hereto and made a part of this order.

      3. All previously published 814 Transaction Standards are modified to incorporate an additional "Utility Assigned Account Number for the ESCO/Marketer" data segment.

      4. This proceeding is continued.

(SIGNED)   _____
                         Commissioner

Note: The following documents are available electronically from the Commission's web site at <u>http://www.dps.state.ny.us/98m0667.htm</u>.

Supplement	Description
SUPPLEMENT A	• TS820 Remittance Advice Implementation Guide - Utility Consolidated Billing Models • Remittance Advice Business Processes - Utility Consolidated Billing Models
SUPPLEMENT B	• TS248 Account Assignment Implementation Guide - All Consolidated Billing Models • Account Assignment for Consolidated Billing Business Processes Document
SUPPLEMENT C	• TS824 Application Advice Implementation Guide, Version 1.1

Summary and Disposition of Party Comments

TS820 Payment Order/Remittance Advice		
Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
1. Remittance Advice Business Processes – Utility Consolidated Billing Models, Notes section, page 2.	• In the pay-as-you-get-paid method, the billing party must send payments to the non-billing party, within two business days of receipt and posting by use of Electronic Funds Transfer (EFT), Automated Clearing House (ACH), or similar means to banks or other locations as agreed to by the parties. [B&PP C.8.b.1.] In the purchase receivables method, the parties shall agree upon the date and method of payment [B&PP C.8.b.1.].	(NYSEG) - The payment transfer mechanisms identified in the [Notes] are electronic. The words "similar means" could be interpreted to mean "electronic means." Recommend adding the word "check" to clarify that a non-electronic means of payment is acceptable, which is consistent with the methods identified in the 820 IG: "In the pay-as-you-get-paid method, the billing party must send payments to the non-billing party, within two business days of receipt and posting by use of Electronic Funds Transfer (EFT), Automated Clearing House (ACH), check, or similar means...." *Conclusion: The Notes section of the Business Process Document is modified as suggested by NYSEG.*
2. Remittance Advice Business Processes – Utility Consolidated Billing Models, Notes section, page 3.	• Customer usage, billing, and credit data is to be considered confidential and may not be shared with anyone without the express authorization of the customer, unless disclosure is required by appropriate legal of regulatory authority or is authorized in accordance with the Uniform Business Practices to facilitate the customer's retail access of billing and payment choice. Supply service billing data for customers with negotiated supply contracts may not be disclosed without the ESCO's consent, except as otherwise required by appropriate regulatory and other legal authorities. [B&PP B7.]	(NYSEG) - Need to clarify that third party data service providers are to be bound to the same level of accountability as the party to whom they represent. The confidentiality clause needs to be expanded to include third party data service providers, as these providers will have full access to any data being transmitted between an ESCO/Marketer and Utility. It is imperative that third party data service providers be held to the same standard of confidentiality of data as the party they represent. The following should be added to the end of the clause as a Collaborative Working Group rule: "Third party data service providers will be held to the same level of accountability for data confidentiality as the party to whom they represent. The ESCO/Marketer and/or Utility utilizing a third party data service provider will take necessary steps to bind their third party data service provider to this via the Billing Service Agreement and/or Trading Partner Agreement." *Conclusion: The confidentiality statement initially proposed is replaced with the statement approved in the June 21, 2002 order adopting EDI standards for Utility Consolidated Billing..*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
3. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Definition, page 5.	Process by which customer payments made on consolidated bills are allocated, payments are transmitted and details of payments and payment reversals are communicated. Payments may be reversed under the following scenarios: • Returned check • Misapplied payment • Duplicate payment on an individual account • Payment remittance is rejected • Bill is cancelled (Not used with Bill Ready Pay As You Get Paid Method). Depending on the scenario, the method for processing payment reversals may be EDI or non-EDI and will be detailed in the Billing Services Agreement (BSA).	**(SmartEnergy)** – [S]upports a position that all transactions between parties should be standardized in the described EDI transaction sets (TS) and separate or alternative processing routines between trading parties should be discouraged. In as much as exceptions are discovered in day to day processing, it appears to be acceptable to identify, in a Billing Services Agreement (BSA), how exception EDI processing is communicated through non-EDI channels. We believe all known scenarios for reversing payments should be handled through standard TS. *Conclusion: The text is modified as suggested by SmartEnergy.*
4. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Sub or Preceding Processes, fourth bullet, page 6.	• Customer is established on consolidated billing model. • The billing party issues consolidated bill. • Billing party receives a payment for a consolidated bill. • Billing party allocates payment according to payment allocation rules or customer instruction. • Where allocation results in amount that should be paid to the non-billing party, funds are transferred and 820 Remittance Advice are sent.	**(SmartEnergy)** - It is important to note that the process for customers to direct how the billing party is to allocate payments is described in B&PP C.8.b.6.a Footnote 30. Citation "B&PP C.8.b.6.a Footnote 30" should be inserted at the end of the bullet and the word "written" inserted after customer. The new bullet should read as: "Billing party allocates payment according to payment allocation rules or customer written instruction (B&PP C.8.b.6.a footnote 30)." *Conclusion: The text of the UBP rule cited by SmartEnergy has been clarified in this order. The text of the process rules is modified as follows:* *"Billing party allocates payment according to payment allocation rules or documented customer instructions (see footnote 30 comment).*
5. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Rules, page 6.	[B&PP C.2.a] The specific functions that must be undertaken by either the utility or the ESCO, as the consolidated billing party, include: (11) Receiving and recording customer payments; (12) Allocating and transmitting the non-billing party's share of receipts, by account, to the non-billing party; (13) Responding to general inquiries and complaints about the overall bill and its format; customers are to be referred to the non-billing party for inquiries and complaints related to the non-billing party's rates, charges, and services; and (14) Maintaining records of billing information, including billed amounts, amounts collected, amounts remaining, amounts transferred, and dates.	**(SmartEnergy)** - The filed 820 model for Utility Consolidated Billing Models does not address ESCO consolidated billing models as detailed in this citation. It should be noted that this B&PP rule [C.2.a.] as well as others, is a rule intended for both Utility & ESCO consolidated billing models. *Conclusion: New text has been added to the Notes section of the Business Process Document to clarify the use of references to Billing and Payment Processing Practices.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
6. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Rules, page 7.	[B&PP C.8.a. Footnote 28] Utilities are prohibited from collecting or disconnecting service for amounts in dispute until certain measures are taken. ESCOs are obligated to follow the dispute resolution process specified in their Disclosure Statements and Contracts to address issues associated with customer disputes concerning their own receivables. The non-billing party must notify the billing party of any amounts placed in dispute if the dispute affects billing and payment processing.	**(SmartEnergy)** - Currently no EDI transaction is available to communicate amounts in dispute between the billing and non-billing party. SmartEnergy recommends Staff create a standard manual process for trading parties to communicate customer disputes. *Conclusion: The Collaborative may develop a plan for non-EDI communication of dispute information and submit it for our approval.*
7. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Rules, page 10.	[B&PP C.8.b.(6)(b)]The billing party may retain any payment amounts in excess of the amounts due as prepayments for future charges or return the excess amounts to customers. For customers on utility deferred payment or budget plans, the billing party shall apply amounts in excess of the amount due (which includes the deferred or budget installment payment) to the balance of outstanding deferred charges, if applicable, or credited as additional payments under the customer's budget plan.	**(Smart Energy)** – [R]ealizes the concern of the utilities that customers' payments should be allocated in a timely and accurate manner that is also efficient. This rule is entirely applicable only to the utility consolidated model, but is not acceptable under the ESCO consolidated model. We believe this rule needs to be designated as applicable to utility consolidated billing model only. A full discussion of applicability to ESCO consolidated billing model is to be considered during July CWG meetings. We recommend "Under Utility Consolidated Billing Model" be inserted at the beginning of rule B&PP C.8.b.6.c. *Conclusion: The amount of a customer's payment that is in excess of the amount due should be treated in the manner prescribed in the Practices regardless of which entity is the billing party i.e. when the billing party knows (either Utility or ESCO) that the customer is on a deferred payment or budget plan, the excess must be applied to those plans. If they don't know or the customer is not on a deferred or budget plan, the billing party will apply the excess as a prepayment against their own future charges.*
8. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Rules, pages 14.	[CWG] [C.8.b.(6)(d)] When a customer contacts either the billing or non-billing party regarding an unidentified payment, the recipient of the payment, whether the billing party or the non-billing party, will investigate the payment.	**(Smart Energy)** - The second bullet describing the process for unidentified payments for the non-billing party is not needed if one assumes all payments once identified during a company's cash application process, will be sent to the billing party for allocation based on current B&PP rules. *Conclusion: SmartEnergy's assumption is incorrect and as clarified in this order, in some instances payments will be applied in a manner other than the one specified in the allocation rules at C.8.b. (6)(a).*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
9. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Comments /Recommendations/Issues section, pages 15.	Recommendation: This rule [C.8.b.(6)(b)] provides instructions for allocating payments when payment amounts received are in excess of amounts due and directs that such payments may be held as prepayments for future charges, or returned to customers, or, where utility deferred payment or budget plans are in effect, applied to outstanding deferred charges or additional payments under the customer's budget plan. Since Utility experience has shown that often the intention of customers in paying an amount in excess of the amount due is to prepay utility charges, the Collaborative recommends that this process be simplified so that all excess payments are applied to the Utility account. Should the customer request a different allocation of the excess payment, the customer request would be honored.	**(Con Edison/Orange & Rockland)** – Concurs with all the recommendations and issues noted in the Comments/ Recommendations/Issues section of RAUO, especially: • Payments received by the utility in excess of amounts due should be allocated in full to the utility because the utility experience shows that the customer's intention is a prepayment of utility charges. • Notification of a customer payment to the non-billing party should be limited to a single notification, the 820 Remittance Advice. • Where payments are received by the non-billing party, the non-billing party should apply the entire payment to the non-billing party customer account, unless the parties agree to allocate the payment between them. This best assures accuracy in initial application of customers' payments. However, it should be noted that this method does not apply to the "purchase receivables" model where the non-billing party would be obligated to transfer any customer payments to the billing party in accord with the method prescribed in the Billing Services Agreement between them. **(SmartEnergy)** – [It should be noted] for the record that the citation for this language is not B&PP C.8.b.6.b but should be B&PP C.8.b.6.a. The recommendation as written as applied to B&PP C.8.b.6.a, is unacceptable to SmartEnergy, as it does not restrict language to the utility consolidated billing model. If B&PP C.8.b.6.a is applied to the ESCO consolidated billing model, a number of business processes as detailed in rule B&PP C.8.b.6.a are not supported in the 810 such as utility deferred payments. We recommend this language be adopted for utility consolidated billing only. **(Niagara Mohawk)** – Agrees with the instructions for allocating over-payments. Any over-payment that the Billing party receives should be allocated to the Utility for numerous reasons. First, the payment could be in the form of a DSS allowance such as a Heap Grant, in which event any excess should be forwarded to the Utility for future distribution charges. Second, the Utility will be the provider of last resort if the ESCO returns the customer. For this reason, any excess amount should be maintained by the Utility. Third, the customer may intend to pre-pay charges, especially elderly customers who temporarily relocate South in the Winter months or college students. *Conclusion: See the Conclusion regarding Issue #7 above.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
10. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Rules, page 9 and Comments /Recommendations/Issues section, pages 16.	Process Rules: [B&PP C.8.b.2.] Notification of Payment. In the pay-as-you-get-paid method, the billing party shall, at the time a payment is posted for a customer, notify the non-billing party that payment has been received from that customer and, within two business days after the date the funds are transferred, notify the non-billing party, in account detail, of the payments received from customers, the date payments were posted, the date payments were transferred, and the amounts allocated to the non-billing party's charges. Recommendation: This rule [C.8.b.2] requires that two notifications be sent to the non-billing party related to a customer payment. Specifically, the rule requires that the billing party notify the non billing party at the time a payment is posted for a customer that payment has been received and requires another notification with additional information within two days after the funds are transferred. The Collaborative recommends instead that a single notification, the 820 Remittance Advice, be provided at the time of funds transfer, which includes all required information including the date payment was received from the customer.	**(SmartEnergy)** - [The company] fully supports the Working Group's recommendation to notify the non-billing party of payments received two days after the receipt of payment. This rule is a generally accepted method of payment advice in the industry. **(Niagara Mohawk)** – [E]ndorses the Collaborative's recommendation that there be only one notification, viz., the 820 advice notification of the transfer of funds, which notification includes the date of payment received. Most businesses will not update or hold accounts without transferred monies, which is consistent with utility practices today. If such an account were to be updated, error statements and corrected entries would be required in the event the actual money was thereafter delayed or posted incorrectly to another account. The key event is the transfer of money, not posting by the billing party. *Conclusion: The Billing and Payment Practices are modified to require a single notification to the non-billing party.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
11. Remittance Advice Business Processes – Utility Consolidated Billing Models, Process RAUO (Parent Process), PAYMENTS OR PAYMENT REVERSALS ARE PROCESSED UNDER UTILITY CONSOLIDATED BILLING MODELS, Process Rules, page 13 & Comments /Recommendations/Issues section, pages 16.	Process Rules: [CWG] [B&PP C.8.b.6.a. Footnote 30] This rule states that a customer can authorize payment allocations other than the allocation rules stated in B&PP C.8.b.6 by providing written instruction to the billing party separate from any notation on the bill payment stub or check. Also, the billing party may honor customer requests received by other means (notation on a check stub or check, verbal or electronic request, etc.) if it retains clear proof of the customer's instructions. This rule should be applied to payments received by either the billing party or the non-billing party. Specifically, receipt of a customer payment by the non-billing party should be honored as a customer request for application of the payment to the customer's non-billing party account. Should the customer provide additional instructions at a later date, actions will be taken by the non-billing and billing parties to apply the payment in accord with the customer request. Issue: This rule [C.8.b.6.a. and Footnote 30] states that a customer can authorize payment allocations other than the allocation rules stated in C.8.b.6 by providing written instruction to the billing party separate from any notation on the bill payment stub or check. Also, the billing party may honor customer requests received by other means (notation on a check stub or check, verbal or electronic request, etc.) if it retains clear proof of the customer's instructions. This rule should also be applied to payments received by the non-billing party. Specifically, receipt of a customer payment by the non-billing party should be honored as a customer request for application of the payment to the customer non-billing party account. Should the customer provide additional instructions at a later date, actions will be taken by the non-billing and billing parties to apply the payment in accord with the customer's request.	(SmartEnergy) – [O]bjects to the CWG's recommendation regarding the assumption that a customer's action of mailing a payment to the non-billing party constitutes the customers request to have the money applied to the non-billing account. This position for SmartEnergy may appear to be counter-intuitive for the Utility Consolidated billing Model, however this rule is applicable to both Utility and ESCO Consolidated Billing Models as written. We argue that B&PP C.8.b.6.a Footnote 30 as written is applicable for both consolidated billing models and expressly requires a customer to provide written authorization to supplant payment allocation rules. We support the position that payment allocation rules be applicable to both billing and non-billing parties. The impact to ESCO's, if the change to B&PP C.8.b.6.a Footnote 30 as proposed by the CWG is adopted, is an unfair application of customer payments to utilities under the ESCO consolidated billing model regardless of new routines, which may be needed to implement transfer of money from the non-billing party to the billing party for allocation. We have practical experience today of customers directing payments to the utility to avoid ESCO contractual payment. (Niagara Mohawk) - [F]ully supports both Recommendations. The billing party should be required to observe a proper payment allocation designated by the customer. At the same time, a customer should also be able to have the non-billing party make an appropriate payment allocation. When a customer receives a bill from the billing party with a request for payment and an addressed return envelope for the payment along with the bill stub to be included in the envelope for mailing, but the customer purposely sends the payment in an envelope that it has prepared and mails it to the non-billing party, the customer is clearly communicating its desire that payment be directly applied to the non-billing party's charges. The circumstances under which a customer would so act would likely be infrequent, but they do occur today. Thus, for example, where the customer has an outstanding final bill under the two- bill scenario before it switched to consolidated bill, the payment should go to the non-billing party. And if the customer is in threat of disconnect by the Utility, the payment would be allocated to Utility charges in any event. The information regarding such payment will be clearly communicated to the billing party in the Pam

Summary and Disposition of Party Comments

		segment that is provided in the 810 transaction set or via a non-EDI method if applicable. Given the current infrequency of these types of transactions, the small percentage of affected accounts, and the absence of any indication that a greater frequency will occur post-EDI implementation, the Company believes that the costs to change the existing payment processing practices outweigh any benefits claimed by others. *Conclusion: The Practices regarding customer's instructions [C.8.b. (6)(b)] will apply to both billing and non-billing parties and should take precedence over any other payment allocation scheme.*

12. Implementation Guide, RMR segment, RMR07 element, code values, page 13.	RMR07
	Adjustment Reason Code
	Required if RMR03 = AJ (Adjustment)
	Not used if RMR03 = PO (Payment on Account)
	25 Item Not Accepted
	Payment remittance is rejected - This would be used in the case where the 820 was sent, along with the cash to the non-billing party, who subsequently rejects a portion of the 820. Since the cash itself isn't rejected, a correcting entry must be made. This adjustment reason code will be used to back out the rejected amount.
	This code is not to be used if the entire 820 is rejected
	26 Invoice Cancelled
	86 Duplicate Payment
	CS Adjustment
	    Other Adjustments
	FC Fund Allocation
	    Misapplied Payments
	IF Insufficient Funds
	    Returned Check
		(Niagara Mohawk) – [R]ecommends that the code "BD"' for Bad Debt be included among the other listed adjustment reason codes. Such a BD code is necessary in the purchase-of-receivables-with recourse model. In this model, the Utility will purchase the receivables from the ESCO up front as specified by the contractual agreement between the two parties. When payment is not received from the customer on accounts enrolled with the ESCO, the Utility has the authority as specified in the contractual agreement to write-off the bad debt and deduct from future purchase receivables payments the amounts that have been written-off and determined to be uncollectible based on the age of the arrears. The BD code would be used to communicate the reason for such an adjustment.
		
		Conclusion: The text of the Implementation Guide is revised to include the code requested by Niagara Mohawk.

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
13. Implementation Guide, Front Matter Notes: Rejection – first bullet, page ii.	• The Remittance transaction may be rejected at the summary level when the transaction is a duplicate of a previously transmitted transaction or the sum of the individual payments sent in each RMR loop does not equal the transaction total sent in the BPR02 element.	**(NYSEG)** - Exception language for allowing a zero in BPR02 when the sum of the individual payments is negative occurs throughout the 820 IG (see Front Matter, Remittance Advice Must Match Payment Amount Or Negative Remittance or gray box for data element BPR02). [The sentence should be revised] to be consistent with the remaining documentation: "The Remittance transaction may be rejected at the summary level when the transaction is a duplicate or a previously transmitted transaction or the sum of the individual payments sent in each RMR loops does not equal the transaction total sent in the BPR02 element, except when sending a zero in the case of a negative remittance advice." *Conclusion: The Front Matter Notes for the 820 Implementation Guide have been re-ordered and the text of the Notes on 'Rejection' has been revised to clarify rejection reasons associated with negative remittances.*
14. Implementation Guide, BPR segment, BPR03 element, Credit/Debit Flag Code, page 5.	BPR03 Credit/Debit Flag Code C Credit	(NYSEG) - One alternative for handling negative remittances identified in both the business process and IG documents, is "sending a Remittance Advice where the summary amount for the 820 transaction is a negative number when the detail amounts is a negative number." This alternative was added right before the documents were filed. In order to support this option, a Debit code needs to be added. Currently the IG only allows for a C (Credit). *Conclusion: The 820 Implementation Guide is modified to include the code requested by NYSEG and, at the same time, to clarify the notes associated with the BPR02 element to avoid confusion regarding how to indicate the total remittance amount is an negative number.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
15. 248 Implementation Guide, NTE segment, segment notes, page 14.	Segment: **NTE** Note/Special Instruction (Customer Name) Position: 160 Loop: RMR Optional (Must Use) Level: Detail Usage: Optional Notes: Optional	(NYSEG) - The intent was that this segment would be Optional not Optional (Must Use). The way it's stated would require all NY parties to provide this segment. There should be gray box text similar to what appears in the N1 (customer name) segment of the 867MU: "Supplemental text information that may be supplied to provide "eyeball" identification of the customer service. It is not necessary for successful completion of the transaction but may be provided by mutual agreement between trading partners". *Conclusion: It is the RMR Loop that is Optional (Must Use); the segment usage for the NTE segment is Optional and therefore no change is necessary.*
	TS814 Standards	
16. All 814 Standards – Implementation Guides and Data Dictionaries	Segment: **REF** (Utility Account Number for ESCO/Marketer) Position:030 Loop: LIN Optional (Must Use) Level: Detail Usage: Optional (Dependent) Max Use: 1 Request: Conditional Response: Conditional This segment is used to communicate an account number assigned by the Utility to the ESCO/Marketer and may be sent with the mutual agreement of the parties.	(Con Edison/Orange & Rockland) - The Companies support the addition of the conditional data element, Utility Account Number for ESCO/Marketer, to the TS 814. In the existing specification, which only provides for identifying the ESCO by DUNS number or Tax Identification Number, there is no facility that permits an ESCO to identify aggregated groups of customers for business purposes. The addition of the conditional data element "Utility Account Number for ESCO/Marketer" will provide the flexibility to identify accounts to a group. In Con Edison's experience, ESCOs have requested that accounts be administered within ESCO-designated groups; this would be impracticable if the utility were constrained to identify the ESCO/Marketer with a single reference identification. *Conclusion: Staff will issue updated Implementation Guides for the 814 Standards and distribute a notice to the parties on August 7, 2002.*

Summary and Disposition of Party Comments

TS248 Account Assignment		
Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
17. 248 Account Assignment For Consolidated Billing Business Process -All Consolidated Billing Models, BILLING PARTY PROCESSES RETURN OF ACCOUNT RECEIVABLE (s) OR CREDIT BALANCE TO NON-BILLING PARTY (Parent Process), Process Rules, page 7.	C.8.b. (6)(b) The billing party may retain any payment amounts in excess of the amounts due as prepayments for future charges or return the excess amounts to customers. For customers on utility deferred payment or budget plans, the billing party shall apply amounts in excess of the amount due (which includes the deferred or budget installment payment) to the balance of outstanding deferred charges, if applicable, or credited as additional payments under the customer's budget plan.	**(SmartEnergy)** – [W]ould like to highlight to Staff that this citation is not directly related to Account Assignment For Consolidated Billing Business Process, however because it is included, we will comment. SmartEnergy requests that this citation be deleted from the document. We believe this rule is applicable to only utility consolidated billing. ESCO consolidated billing does not support the application of excess payments to utility deferred charges or unbilled utility budget bill imbalances as these balances are not maintained by the ESCO nor is there a technical transport mechanism in place for the ESCO to receive this data. We recommend instead that in the case of ESCO consolidated billing we keep excess payments as a credit to the customers account or refund to customer. *Conclusion: The cited practice is applicable to the 248 standard because it affects customers' balances at the time of assignment. SmartEnergy is incorrect in its assertion that this rule only applies to utility consolidated billing.. The clarification documented in the Remittance Advice Business Process Document is applicable to Account Assignment. (Refer to the Conclusion for Issue # 7 above)*
18. 248 Account Assignment, Implementation Guide, Notes, page 1.	This transaction set standard defines the requirements for the 248 Account Assignment sent by the billing party to the non-billing party for consolidated billing models.	**(NYSEG)** – The 248 should clearly identify that this transaction does not apply to the Single Retailer. *Conclusion: The Front Matter Notes and Notes in the Table of Contents are modified as suggested by NYSEG.*
19. 248 Account Assignment, Implementation Guide, Field Descriptions, page iii.	This section shows the X12 Rules for this segment, with the exception of the Usage and Max Use fields, which include NY rules. For Usage, "Optional (Must Use)" means that the segment is Optional for X12, but required for NY. You must also review the grayboxes below for additional NY Rules.	**(NYSEG)** – The word "Dependent" has been added to the word "Optional" under Loop and Usage for the following segment descriptions: ESCO/Marketer Customer Account Number Previous Utility Customer Account Number Date or Time or Period (Invoice Information) Invoice Amount Invoice Number For consistency, the IG Guideline Field Description should be updated to also include the definition of "Dependent". *Conclusion: Text Box note has been revised accordingly.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
20. 248 Account Assignment, Implementation Guide, NM1 (Customer) segment, page 8.	D4 Debtor NM103 identifies the end use customer targeted by this transaction	**(NYSEG)** – The code provided (D4 – Debtor) to identify that this NM1 identifies a customer in the NM101 element is not consistent with the code used in other implementation guides. The code should be revised to specify that code "8R" should be used to identify the customer as done in other implementation guides. *Conclusion: The D4 code conforms to Utility Industry Group X12 standards; no modification is necessary. NYSEG's recommendation is rejected.*
21. 248 Account Assignment, Implementation Guide, NM1 (Customer) segment, page 8.	NM103 1035 Name Last or Organization Name This element may contain the actual customer name or the literal 'NAME'.	**(NYSEG)** – The current gray box text used for the NM101 element does not contain the generic language regarding the use of a customer name for "eyeball" recognition, as done in other implementation guides. For consistency with the rest of the implementation guides the gray box text should be revised to include the following: "Supplemental text information supplied, if desired to provide "eyeball" identification of the customer name. It is not necessary for successful completion of the transaction but may be provided by mutual agreement between trading partners." *Conclusion: The gray box text has been modified to include NYSEG's suggested text.*
22. 248 Account Assignment, Implementation Guide, Front Matter Notes, page i.	HL Loop - One HL Loop may be sent in each 248 transaction. - The HL Loop contains the HL segment, which simply begins the detail portion of the transaction. - The HL Loop contains an NM1 segment used to provide the customer name and several REF segments to aid in identifying the account, such as Previous Utility Account Number, ESCO/Marketer Customer Account Number, or Commodity. - The HL Loop also contains a BAL segment to provide the amount of the receivable being reassigned and date segments to provide the date of the reassignment.	**(NYSEG)** – For the fourth bullet, the date segments are not in the HL loop but in a separate DTP loop. Recommends changing the left column to read HL and DTP loop. The fourth bullet should be revised as follows: "The HL Loop also contains a BAL segment to provide the amount of the receivable being reassigned." A fifth bullet should be added to read: "A DTP loop contains the date segments to provide the date of the reassignment." *Conclusion: The Front Matter Notes regarding the HL Loop and DTP Loop for Invoice Information are modified to address the concerns raised by NYSEG.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
23. 248 Account Assignment, Implementation Guide, REF*QY, page 13.	**REF** **Reference Identification (Commodity)** Optional This segment may be sent to indicate whether the balance being reassigned pertains to electric charges, gas charges or both.	**(NYSEG) –** It is necessary for the segment being sent to indicate whether the balance being reassigned pertains to electric charges, gas charges or both. Segment Usage should be required to inform the recipient of the transaction, that the amount shown in the required BAL segment applies to one or all commodities for the specified account. Segment Usage should be changed from "Optional" to "Optional (Must Use)." *Conclusion: The designation of commodity type for collection or posting purposes by the recipient is not essential and requiring this detail in the transaction may not be technically feasible for all parties. The segment usage will remain optional but NYSEG may subsequently raise this issue after a Change Control Process has been implemented.*
24. 248 Account Assignment, Implementation Guide, REF*QY, page 13.	BOTH Both Commodities EL Electric Commodity GAS Gas Commodity	(NYSEG) – The code "BOTH" for use in REF03 is not clear and assumes the presence of only two commodities. Use the code "ALL" to indicate that the reported amount is for all the commodities on the account that apply to the specified E/M. If "BOTH" is retained then it should state specifically that "BOTH" applies to combined Electric & Gas Accounts only and not to any other commodity. *Conclusion: This level of detail is unnecessary.*
25. 248 Account Assignment, Implementation Guide, DTP Date or Time or Period (Invoice Information), page 17.	**Segment: DTP Date or Time or Period (Invoice Information)** Position: 120 Loop: DTP Optional (Dependent) Level: Detail Usage: Optional (Dependent) Notes: Conditional Required if providing information at an invoice level. One DTP loop will be provided for each invoice. The sum of the amounts sent in all AMT02 elements must equal the amount sent in BAL03 (see above).	**(NYSEG) –** Gray box states that this segment is required while segment usage is "Optional" (Dependent). Segment Usage should be changed from "Optional" to "Optional (Must Use)." **(NYSEG)** – Segment usage for segments specified within the DTP loop for Invoice level detail does not appear to be correctly specified. The DTP loop usage correctly shows the DTP loop for Invoice Detail is Optional (Dependent). However, several segments with a DTP loop for Invoice Detail would be required when this loop is used. Change Segment Usage to Optional (Must Use) on the DTP segment, the REF segment for the invoice number, and the AMT segment for the invoice amount that occur within the DTP loop for Invoice Details. *Conclusion: The DTP Loop for Invoice Information is conditional but this loop contains 3 data segments and all must be sent if the Loop is being sent. The segment notes for all three segments within this loop have been clarified, but the segment usage will remain Optional (Dependent) to avoid errors in Phase 1 syntactical testing.*

Summary and Disposition of Party Comments

TS824 Application Advice Version 1.1		
Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
26. Front Matter Notes: Purpose - second and third bullets	• An 824 Application Advice must be sent when an EDI transaction, other than an 814, cannot be processed by the recipients system and must be resent. • An 824 Application Advice transaction should not be sent as a positive response to any transaction.	**(NYSEG)** – Delete existing bullets and replace with new bullet: • The 824 Application Advice is used for processing cases where the transaction recipient needs to communicate a negative or error situation to the sender and the transaction in question is not compatible for 'response' actions. *Conclusion: The text of the Notes is revised to address NYSEG's concerns.*
27. Front Matter Notes: Action Codes – first and second bullets	• An action code is sent in the BGN segment to indicate to the receiver what action to take. When BGN08=82, the receiver is expected to correct the problem and re-send the underlying transaction. In these instances, the corrected transaction should be sent within 5 business days. • When BGN08=EV, the receiver is expected to evaluate the problem and make any necessary modifications to their system but the underlying transaction should not be resent.	**(Con Edison/Orange & Rockland)** The revised version assumes business processes that were not adopted in any Commission-approved document. This is inappropriate. Specifically, the Collaborative left open and did not prescribe actions to be taken if transactions were rejected, assuming in many cases that follow-ups would be manual and at the discretion of each party to the transaction. Parties were expected to determine what actions, if any, were necessary in the context of their business model. Therefore, the 824 transaction requirement for actions to be taken by the sender, which is reflected in the BGN action codes, is overly prescriptive. The transaction needs to provide a neutral action code allowing both parties to identify that a discrepancy has occurred and to permit both parties to take action as needed in a form or manner suited to the circumstances and business practices. *Conclusion: Con Edison's suggestion is not adopted. Version 1.0 of the 824 Application Advice was limited to E/M rejection of a single transaction type (867) originated by the Utility. Error conditions could more easily be resolved via a phone call so using the rejection transaction to indicate a prescribed follow-up action was unnecessary. Version 1.1 accommodates rejection notices for multiple error conditions in five different types of transactions. Since transactions related to consolidated billing activities are time sensitive, it is now necessary to have an automated means for the initiator of the rejection notice to indicate what follow up actions should be taken. Further, Staff's proposed approach is consistent with 824 implementation in the mid-Atlantic states whereas Con Edison's proposal for a neutral action code is not. Further, allowing both parties to take follow up action "as needed in a form or manner suited to the circumstances and business practices" as Con Edison has suggested, creates the potential for each party to devise their own unique procedures for resolution of error conditions. A multiplicity of non-standard approaches increases costs for ESCO/Marketers who must deal with more than one Utility.*
28. Front Matter Notes: Action Codes – second bullet	• When BGN08=EV, the receiver is expected to evaluate the problem and make any necessary modifications to their system but the underlying transaction should not be resent.	**(NYSEG)** - Revisions should be made to the second bullet item in this section. The disposition of the data sent in the transaction for which the 824 are in response is not stated. The reader of the document does not have any idea of what happened to the data provided in the original document. This code is apparently to be used only when an 810 is sent

Summary and Disposition of Party Comments

| | | where the bill presenter or bill calculator does not match those of the bill presenter.
 Replace second bullet with following:
• When BGN08=EV, business information provided on the underlying transaction has been processed in accordance with values provided at the time of enrollment or through account change as equivalent values provided on the underlying transaction are in disagreement. The receiver of the 824 reject is expected to evaluate the problem and make any necessary modifications to their system but the underlying transaction should not be resent.
Conclusion: NYSEG's assumption – this code is apparently to be used only when an 810 is sent where the bill presenter or bill calculator does not match those of the bill presenter – is erroneous. Transactions will be resent or not based on the type of transaction, the relationship between the trading partners and the specific errors which created the need to send a rejection notice. The complexity of the transaction makes it difficult to articulate a standard approach regarding when, or if, some information contained in the transaction that was rejected will be processed by the recipient anyway even though a rejection notice is being sent. This level of detail should be documented in the Billing Services Agreement executed between two parties. |

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
29. Front Matter Notes: Action Codes		**(NYSEG)** – Add new third bullet: • The action code to be used is dictated by the processing rules (depicted in the gray box notes) of the TED02 element in the TED segment. Unless explicitly stated in that documentation, the action code (BGN08) will always be 82. *Conclusion: It is not a good practice to use the error code alone to indicate the follow up action because the same error code may be used to reject more than one type of transaction. As Con Edison has suggested (see their comment on the TED02 code below), the preferable alternative would be for this level of detail to be documented in a subsequently filed Business Process Document.*
30. Front Matter Notes: Rejection Reasons – first bullet	• Rejections reasons are communicated by error codes sent in the TED segment and additional text to clarify the reason for rejection may be sent in an NTE segment. When the rejection reason is "A13" (Other), an NTE segment is required. Code A13 may only be sent by mutual agreement of the trading partners.	**(NYSEG)** - The first bullet should be modified and the last sentence removed. A party that originates EDI transactions is either accountable for the information they provide or has a significant interest in the results of requests sent to a trading partner. Having the ability to communicate rejection of a transaction in an automated, timely and efficient manner to the sending party when there is no appropriate rejection reason code will ensure timely resolution. Code "A13" was thought to provide this capability. Requiring mutual agreement for using the "A13" code eliminates this ability when there is no agreement. The bullet should read: • Rejections reasons are communicated by error codes sent in the TED segment and additional text to clarify the reason for rejection may be sent in an NTE segment. When the rejection reason is "A13" (Other), an NTE segment is required. Rejection Reason "A13" is to be used only when use of other reject reasons would be misleading. A transaction rejected with reason code "A13" implies direct contact for manual follow-up is required unless the reason for the reject can be clearly determined from the originating transaction and information provided in the 824 reject transaction. *Conclusion: Accept and modify as suggested by NYSEG.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
31. Front Matter Notes: Rejection Reasons – second bullet	• The notes listed for each error code in the TED segment should be carefully reviewed since the use of some error codes is limited to the rejection of specific types of transactions.	**(NYSEG)** - The second bullet should be deleted. Error codes are specific to a business process not to a particular EDI transaction and should not be limited by EDI transaction within the IG. A business process should be able to determine whether a particular rejection reason is appropriate. A reject reason that is currently unexpected may be appropriate in an unexpected current or in a future situation. The business process should be able to accommodate these unexpected situations through some means of exception reporting. The gray box text referencing specific transactions where a reject reason may be used for the following reject reason codes A13, A76, A84, API, CRI, DIV, SUM, and TXI in the TED segment description, should be removed. *Conclusion: The 'let everyone decide on their own' approach suggested by NYSEG is unworkable. The association of specific error codes with specific types of transactions adopted herein may be modified later as circumstances dictate.*
32. Front Matter Notes: Rejection Reasons – third bullet	When the recipient of a transaction detects a problem that cannot be adequately described by the error codes provided in this implementation guide, they should contact the sender via a non-EDI means as soon as possible.	**(NYSEG)** - The third bullet should be deleted. The bullet, and non-EDI contact, are not needed as this is the exact purpose for X12 providing the A13 (Other) code in this situation. *Conclusion: Accept in conjunction with revisions suggested regarding use of the A13 code.*
33. Front Matter Notes: Rejection Reasons – fourth bullet	• In some instances, an ESCO/Marketer may receive an 867MU transaction for an inactive account. This could occur when either the Utility subsequently adjusts prior period usage transactions or final usage for an account that has been closed may be sent after the effective date for a drop transaction for that account. Utilities will send 867MU transactions to communicate prior period adjustments and/or final usage to any ESCO/Marketer of record during the period affected even though an ESCO/Marketer may not be the current supplier of record. In these instances, the ESCO/Marketer should not reject the 867MU transactions.	**(Con Edison/Orange & Rockland)** - The revised requirement that prohibits the rejection of the 867 MU is technically infeasible to implement because transaction validation is accomplished via a review of the receiver's active account records. Due to this, these transactions will automatically reject and rightly so. In such a case, the receiver of the 867 MU may wish to review archived account records and determine what action to take. In these circumstances, it could be detrimental to business operations to inhibit the rejection of an 867 MU. *Conclusion: The text cited by Con Edison is virtually identical to the text of the Notes in version 1.0 of the 824 Application Advice and thus is not a new requirement. It now appears, however, that* the *practice stated in the original note ("these transactions should not be rejected by the ESCO/Marketer") is technically infeasible. The Front Matter Notes are modified to delete this text.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
34. Implementation Guide – BGN segment, element BGN08, page 4.		**(NYSEG)** - The following note regarding the action code should be added to the end of the section [segment]: The action code to be used is dictated by the processing rules (depicted in the gray box notes) of the TED02 element in the TED segment. Unless explicitly stated in that documentation, the action code (BGN08) will always be 82." *Conclusion: This determination is best made by the Collaborative as a group in a companion Business Process document that may be filed subsequently.*
35. Implementation Guide, N1 (Customer) segment and element N102 notes, page 7.	Segment Notes: Conditional This segment is not used when an 824 is sent to reject an entire 820 (Remittance) or 568 (Management Report) transaction. This segment may sent when the 824 is being used (1) to notify the other party of an error in an 820 or 568 transaction pertaining to an individual account or (2) to respond to either an 867 (Usage), an 810 (Invoice), or a 248 (Assignment) transaction. Element Notes: Must Use The customer name may be provided by mutual agreement of the trading partners to provide "eyeball" identification of the customer involved in the transaction.	**(NYSEG)** –The use of data element 93 (N102) in the "Must Use" category is contradictory to the summary in the gray box, which indicates that "the customer name may be provide by mutual agreement of the trading partners to provide "eyeball" identification of the customer involved in the transaction." *Conclusion: The segment and element notes are modified to remove the inconsistency and to clarify use of the N1 segment in specific instances.*
36. Implementation Guide, N1 (Customer) segment (page 7) and Guideline Field Descriptions (page i).	Field Descriptions: This section shows the X12 Rules for this segment, with the exception of the Usage and Max Use fields, which include NY rules. For Usage, "Optional (Must Use)" means that the segment is Optional for X12, but required for NY. You must also review the grayboxes below for additional NY Rules. **N1 Segment:** **Segment:** **N1** **Name (Customer)** **Position:** 030 **Loop:** N1 Optional (Dependent) **Level:** Heading **Usage:** Optional (Dependent)	**(NYSEG)** - The word "Dependent" has been added to the word "Optional" under Loop and Usage [for the N1 Customer segment]. The IG Guideline Field Description should be updated with the definition of "Dependent." *Conclusion: The 'Field Descriptions' page in the Implementation Guide has been revised accordingly.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
37. Implementation Guide, REF*45 (Previous Utility Account Number) segment notes, page 9.		**(NYSEG)** – The following should be added to the Notes gray box: This segment is not used when an 824 is being sent to reject an entire 568 or 820 transaction; otherwise, this segment is required. *Conclusion: The segment notes are modified accordingly.*
38. Implementation Guide, TED segment, TED02 element, page 13.		**(Con Edison/Orange & Rockland)** - The TED Segment purports to define error codes for the rejection of specific EDI transactions. The Companies feel that the development of EDI has not reached the stage that the definition of applicable codes should be considered complete. The Companies expect that Staff or, when approved, the Change Control process will accommodate proposals for revisions to the codes appropriate to future developments of business processes and transaction standards. *Conclusion: The association of specific codes with specific transactions in Staff's proposal was consistent with the use of those codes in the mid-Atlantic states. The document has been further modified to reflect additional error codes specified in the Business Process Documents for the 820 and 248 standards adopted herein. The TED02 element notes are accepted as revised with the proviso that, as Con Edison suggests, proposals for revisions to the codes may be made to accommodate the future development of business processes and transaction standards.*
39. Implementation Guide, TED segment, TED02 element, notes for Code Value A13, page 13.	A13 – Other (See explanation in NTE*ADD) This code is applicable when the 824 is being used to reject a 248, 568, 810, 820 or 867 but may only be used by mutual agreement of the trading partners.	**(NYSEG)** - The gray box for Free Form Message A13 should be revised to delete the mutual agreement text. *Conclusion: The text associated with error code A13 has been modified as suggested by NYSEG.*
40. Implementation Guide, TED segment, TED02 element, notes for Code Value A84, page 13.	A84 – Invalid Relationship Supplier is not supplier of record. May only be used to reject an 810 Invoice transaction.	**(NYSEG)** - The gray box for Free Form Message A84 should be revised to include additional transactions. The gray box should be revised to read: Supplier is not supplier of record. May be used to reject an 810 or an 867 transaction. *Conclusion: The text associated with error code A84 has been modified as suggested by NYSEG.*

Summary and Disposition of Party Comments

Document Reference	Proposed Text/Structure	Suggested Revisions and Conclusions
41. Implementation Guide, TED segment, TED02 element, notes for Code Values codes A13, A76, A84, API, CRI, DIV, SUM, & TXI, pages 13-14.		**(NYSEG)** – The gray box text referencing specific transactions where a reject reason may be used for the following reject reason codes A13, A76, A84, API, CRI, DIV, SUM, and TXI in the TED segment description, should be removed. *Conclusion: NYSEG's comment with respect to A84 is inconsistent with NYSEG's previous comment. NYSEG also fails to provide a convincing rationale for eliminating the code value notes for these codes. Omitting this detail has the potential to create rather than minimize confusion because each party would be required to make its own subjective judgement regarding which error codes should be used in specific situations. The TED02 codes and corresponding notes as revised are adopted.*