

## Joint Utilities Briefing on Alternatives to Bill Option on EDI 867 Transaction

### Background

On July 09, 2020 representatives from the Joint Utilities met with staff to discuss their views on converting the previously agreed-on optional bill type indicator into a mandatory bill option field in 867 transactions. This bill option field indicates whether the customer is billed on utility consolidated billing or is dual-billed, requiring the ESCO to separately bill for its supply. During this meeting, the JUs expressed concern over mandating this field, stating that there are alternative ways ESCOs and EDI providers can find this information using the existing technology. Staff then asked the JUs to put together a list of ways that current EDI transactions and utility systems allow ESCOs or EDI providers to identify where there is a billing issue with a customer to discuss during the July NY EDI Working Group call both to review viability and for learning purposes. In addition to these system indicators, ESCOs can, and presumably should, be discussing with a potential or existing customer how the customer is billed, whether the customer is enrolled in any special utility-offered programs, etc. ESCOs can easily add these types of questions to their scripts if they do not already have them.

- While it's the supplier community asking for this update, it's not only so they avoid missed revenue or unnecessary research (that doesn't always provide accurate information), it's to avoid a negative customer experience. The customer should be the key focus at the end of the day for everyone within the industry. Anything to prevent a billing error (especially when already outlined in the guides) should be supported, especially with the current economic situation so many individuals are finding themselves in currently.
- The amount of work and headache this would resolve for downstream parties (ESCOs, end-use customers, etc.) far outweighs the level of effort required of the utilities to add this field.
- Things that would be resolved by/benefit from this:
  - Early identification of bill option mismatches
  - Lower occurrence of PUC complaints due to incorrectly billing end-use customers
  - Less inquiries from ESCOs to the LDCs regarding these types of issues (which often go unanswered).

### Review 824 Rejections

For utilities that are bill ready, when receiving an 824 rejection, the ESCO or provider can review the item to determine if an 810 (the transaction that includes supply charges) was sent at the proper time or if another issue may have caused the rejection. As part of the investigation, the ESCO or provider can contact the utility to ask how the account is supposed to be billed.

- The whole point of wanting the Bill Party sent in the 867 transaction is to eliminate the need to do an investigation and/or possibly contacting the utility.
- A one-time minimal cost of implementing this change will reduce costs for years to come with a reduction in the number of questions asked and research involved with customer complaints that can be traced back to a discrepancy in the bill option.
- This only addresses the issue where the supplier has the account set as Bill Ready and the utility has the account set as Dual billing. It does not resolve any other issues related to bill option discrepancies.
- Currently, NYSEG/RGE are not compliant with the NY EDI Standards in that they are sending "OBW" - Outside Bill Window which implies that the account is in fact bill ready but the supplier sent the 810 later than the 2-3 business days where they are allowed to respond with the 810 charges. Instead, NYSEG/RGE should be using the code FRF which very explicitly tells the supplier that the utility is not expecting to receive an 810 because the account is dual billing. This will allow the supplier to properly and timely react and bill the customer days rather than potentially months late.

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- NYSEG/RGE has agreed to look into making the update to use the proper rejection reason code.

### Ongoing Customer Lists

Some utilities, including Central Hudson, Con Edison, and O&R include the bill type in the monthly customer listings that are posted to a supplier's website. NYSEG/RGE are considering adding a column to the weekly customer list that posts to ESCO secured websites that indicates the bill option so ESCOs/third parties can periodically perform a bill option reconciliation. This is an easy indicator of the way all ESCO customers are billed. To the extent supplier websites are not open to or shared with EDI providers, the ESCOs themselves can easily work with EDI providers to make sure they have whatever information is necessary to make their relationships work.

- Consulting the customer list could result in inaccurate billing as it does not provide the bill option for the bill period(s) in question but rather shows the bill option as a point in time when the customer list is generated.

### 814 Initial Enrollments

The bill type is indicated in the 814 responses sent back to the ESCOs. ESCOs can easily review this information to determine the way their customers are billed to the extent they haven't already determined that in the sign-up process or otherwise.

- Not all utilities use the bill option that is sent on the 814 Enrollment Response.
- This doesn't solve the issue when the bill option changes at a later date. Often times the Effective Date on the change response does not line up with the actual meter reading date making it difficult to code a billing system that will get it correct every time.

### 810s and 820s

If an ESCO receives 810 or 820 transactions, these are indicators that the customer in question is single-billed at the utility, and if the ESCO doesn't then this is an indicator that the customer is dual-billed at the utility. ESCOs can monitor the types of billing transactions to make sure they are properly accounting for the way their customers are billed.

- If the supplier receives an 810 and their system is set up as Dual Billing, that does not necessarily prevent the supplier from sending the Dual Bill to the customer. The 810 can be received after the 867 that triggers the billing event. If the supplier's billing system validates receipt of the 810 (which is not always the case) a manual process is most likely needed to investigate, often including needing to reach out to the utility. Meanwhile the system may trigger the dual bill to the customer.
- This suggestion does not resolve issues where the utility has Dual Billing and the supplier has Rate Ready. In these cases, the supplier thinks the 810 is simply not being sent. Suppliers need to spend time to reach out to utilities and ask for their missing 810s. Not all utilities are responsive, some take months to respond and meanwhile the customer is not being billed.

### Utility Contact

If ESCOs or third parties have questions about a customer's current bill option, they can email their Supplier Relations contact.

- Supplier Relations are not always responsive, it sometimes takes months and frequent requests to get answers. Sometimes there is absolutely no answer no matter how many times we contact the utility.
- Time spent answering questions and delaying responses to other issues could be alleviated by simply providing the bill option on the 867 transaction.
- Waiting for a utility to respond rather than having the information at the time of the billing event results in a poor customer experience with the customer potentially being over-billed or billed late.

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### Conclusion

The joint utilities agree that the above-mentioned tools can be used to determine whether a customer is single or dual-billed and that these should be sufficient to avoid over or undercharging customers. As this is not a necessary change, the JUs think it better to focus time and resources on those changes which are needed.

- The service providers and ESCOs have stated over and over why the above suggestions do not resolve the issue.
- This is not a significant effort.
  - If the field does not already exist on the application file, it would need to be added and the EDI mapping software or service provider would need to include the new REF segment.
- Benefits to including the bill option on the 867 include:
  - Immediate system-to-system identification of the bill option for each period.
  - Consistency with every other energy choice market that uses EDI.
  - Improved validation, catching any bill option discrepancies immediately.
  - Reduction of Emails to the Supplier Relations teams at the utilities that result from bill option discrepancies.
    - This alone offsets the implementation cost.
  - Improved customer experience:
    - Double billing due to bill option discrepancies eliminated.
    - Delayed billing due to bill option discrepancies eliminated.
- The decision on whether a change is necessary or not should be a collaborative effort, not one sided. The service providers and ESCOs have been asking for this change for years because we feel it is a needed change.
- The ESCOs and Service Providers requested this field years ago due to billing issues. We've patiently waited and only one utility (National Grid) has implemented the change. The ESCOs, Service Providers and Customers have all suffered as a result of not having clear information at the time of the billing event.

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### Examples of Individual Utility Write-Ups

The following are two examples of individual utility write-ups JUs may potentially create. This will help ESCOs and EDI providers understand the tools each individual utility has to address the bill option issue.

### **NYSEG/RG&E - current EDI transactions/tools currently in place which they can use to determine the bill option, as well as potential new ones**

#### **Outside Bill Window (OBW) rejection**

ESCO's/third parties are responsible for reviewing EDI transactions.

If 824 rejection received, please review EDI transactions for the following

- Confirm 810 was actually sent during open bill window (would confirm this with your third party provider –if applicable)
- Bill windows are 2 business days (holidays and weekends not counted), not 48 hours.

The first day you receive the EDI 867 is Day 1, you have until 4:30 p.m. the following business day (Day 2) to return your 810 or it will reject OBW. If the 810 is received after 4:30pm on Day 2, it will reject. ESCO/EDI Providers are responsible to track this and apply the missed bill window charges on the next 810; or if the account is finalized and will not be another open bill window you will need to dual bill)

Two-Day Bill Window Example: You receive an EDI 867 MU (usage record) on a Friday; you have until 4:30 p.m. the following Monday to return your EDI 810. Anything received after 4:30 p.m. is considered as received the following day.

- If 810 was sent during open bill window, please check your records for the following
  - Is the account single or dual billed? If account is dual billed, OBW rejection will be sent. (to determine this you would check EDI to see if you enrolled it dual billed or if you sent an 814c to change to dual billing; OR check to see if the utility sent you an email alerting you it needed to be changed to dual billing (rare circumstance where customer has elected a specialized billing option not compatible with single bill)
  - Was the correct 867 cross reference used on the 810?
  - Did you use the ESCO account# referenced in the 867mu?
  - NYSEG/RG&E are looking into adding a column to the weekly customer list that post to ESCO secured website that indicates the bill option so ESCOs/third parties can periodically perform a bill option reconciliation.
  - If ESCOs or third parties have questions about a customer's current bill option –they can email their Supplier Relations contact

### **Central Hudson**

Central Hudson lists the bill type on the monthly customer listing that is posted to the supplier website. They may also reach out to [retailaccess@cenhud.com](mailto:retailaccess@cenhud.com) if there are any questions.