

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on February 19, 2003

COMMISSIONERS PRESENT:

William M. Flynn, Chairman
Thomas J. Dunleavy
James D. Bennett
Leonard A. Weiss
Neal N. Galvin

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

ORDER APPROVING AND MODIFYING
TRANSACTION STANDARDS, TEST PLANS
AND REMITTANCE PROCEDURES

(Issued and Effective February 24, 2003)

BY THE COMMISSION:

INTRODUCTION & SUMMARY

The implementation of Electronic Data Interchange (EDI) in New York has required the development, approval, programming and testing of a variety of EDI data standards needed to support retail access in New York, including transactions for enrolling, switching and billing customers and the exchange of historic and current usage data. This order involves approval of the TS568 Account Receivables Advisement and TS568 Payment Advisement transaction standards and related Business Processes, modifications to the existing TS810 Invoice - Utility Rate Ready Billing transaction standard, updates to the existing EDI test plans associated with implementation of the utility bill ready consolidated billing model and approval

of test plans and remittance procedures for the single retailer model. In addition, this order provides that the proposed TS810 Invoice transaction standard for ESCO consolidated billing be remanded back to the New York EDI Collaborative for further development.

Comments were solicited on the various proposals discussed herein by notices published in the State Register as follows:

<u>Item</u>	<u>Notice Published</u>	<u>Expiration of Comment Period</u>
TS568 Account Receivables Advisement transaction standard and related Business Processes; and TS568 Payment Advisement transaction standard and related Business Processes	December 18, 2002 (SA-36)	January 25, 2003
TS810 Invoice - Utility Rate Ready Billing transaction standard	October 30, 2002 (SA-31)	December 14, 2003
EDI test plan updates and changes in the Technical Operating Procedures	November 27, 2002 (SA-34)	January 11, 2003
Remittance Procedures	October 30, 2002 (SA-32)	December 14, 2002
Test plans for the TS810 Invoice-Single Retailer	August 28, 2002 (SA-25)	October 12, 2002
Updates to test plans for the TS867 Monthly Usage required revisions to the Technical Operating Profile and to Technical Operating Profile, Supplement 1	November 20, 2002 (SA-33)	January 4, 2003

TS810 Invoice - ESCO Bill	October 23, 2002	December 7, 2003
Ready transaction standard	(SA-30)	extended to
		December 10, 2003
		& reply comments
		January 15, 2003

Comments were filed by Niagara Mohawk Power Corporation (Niagara Mohawk) and Consolidated Edison Company of New York, Inc./Orange and Rockland Utilities, Inc. (Con Edison) in support of proposed revisions to the Utility Rate Ready 810 Invoice standard, by Rochester Gas and Electric Corporation (RG&E) on the Single Retailer remittance procedures, and by Niagara Mohawk, Consolidated Edison, New York State Electric & Gas Corporation (NYSEG), Keyspan Energy Delivery (Keyspan) and SmartEnergy supporting and opposing various aspects of the proposed ESCO Bill Ready 810 Invoice Standard. No comments were received on the proposed 568-type standards, the revisions to the test plan for Utility Bill Ready consolidated billing, or the Single Retailer test plans.

SUMMARY AND DISPOSITION OF COMMENTS

The TS568 Transaction Standards

The Commission directed the EDI Collaborative to file proposed 568 transaction standards for use by ESCO/Marketers to communicate accounts receivable information to the utility for presentation on customer's consolidated bills and by utilities to communicate the collection status of the ESCO/Marketers customers when the utility is purchasing the receivables.¹ In

¹ Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Approving Electronic Data Interchange Transactions for Utility Bill Ready and Rate Ready Billing (issued June 21, 2002), p. 13.

compliance with that directive, on December 9, 2002, the EDI Collaborative filed proposed 568 Account Receivables Advisement² and 568 Payment Advisement³ transaction standards for Commission approval. Although no formal comments were received on these proposed standards, Staff had some concerns about certain aspects of the processing guidelines contained in the Account Receivables Implementation Guide. Staff discussed its concerns with several parties and advises that some clarifying language is necessary in the documents comprising the 568 Account Receivables Advisement standard.

Discussion

Revisions are in order to eliminate some ambiguity regarding the use of an 824 Application Advice transaction to reject this type of 568 transaction and the required time frame for transmitting Account Receivables Advisement transactions to the utility, to clarify expectations regarding the use of various descriptive "adjustment reason codes," and to distinguish between use of a Remittance versus Account Receivables Advisement transaction to communicate information upon receipt of a customers payment. In addition, the references to companion documents in the implementation guide and the guide for the 568 Payment Advisement transaction should

² The TS568 Account Receivables Advisement is only applicable to the Pay-As-You-Get-Paid payment processing model and would be used by an ESCO/Marketer to communicate either a customer's beginning balance for presentation on the customer's initial consolidated bill or accounts receivables adjustments (credits or debits) to be presented on subsequent bills.

³ The TS568 Payment Advisement is only applicable to the Purchase Receivables with Recourse payment processing model and would be used by the utility to communicate customer payment information to the ESCO/Marketer.

be revised to correct the titles for the cited documents. Finally, some relevant Uniform Business Practices should be added to the proposed Business Processes documents. The TS568 Account Receivables Advisement and TS568 Payment Advisement transaction standards and related Business Processes will be approved subject to the revisions noted herein. Proposed test plans for the Account Receivables and Payment Advisement transaction standards should be issued for comment by Staff within 30 days.

TS810 Invoice - Utility Rate Ready Billing Transaction Standard

In response to certain concerns raised by Niagara Mohawk, a revised Implementation Guide for the TS810 Invoice - Utility Rate Ready Billing was prepared for the Commission's consideration.⁴ According to Niagara Mohawk, the detailed description of charge amounts currently required to be sent to the ESCO in a cancel transaction is unnecessary as this 810 Invoice standard provides for up to eight data elements to describe a single charge or adjustment presented on a customer's bill. All but one of these are required elements for either an original transaction (to report amounts billed on behalf of the ESCO) or a cancel transaction (to report charges that have been canceled). Along with Niagara Mohawk, Con Edison filed comments supporting the proposed revisions. Staff advises that, upon further consideration, Niagara Mohawk now suggests that rather than revising the Implementation Guide in the manner proposed, the use of the affected data elements could be better left to the discretion of each billing party rather than revising the

⁴ It was proposed to revise the text of this standard such that the elements communicating "rate", "unit of measure" and "quantity" would not be required to describe charges or adjustments in a "cancel" transaction.

Implementation Guide in a manner that indicates that they are "not used" in a cancel transaction.

Discussion

Allowing discretion to be exercised by each billing party as now proposed by Niagara Mohawk satisfies its concerns and has the added benefit of not precluding other utilities that offer Rate Ready billing from providing the additional detail in a cancel transaction as originally planned, or should they so desire. A revised Implementation Guide for the TS810 Invoice - Utility Rate Ready Billing will be adopted incorporating Niagara Mohawk's latest suggestion.

Updates to EDI Test Plans - Utility Bill Ready

The previously approved test plans⁵ for the Utility Bill Ready model did not recognize use of the Positive Notification transaction because its transaction standard had not yet been approved.⁶ Staff proposed to update the previously approved test plan to reflect the recently approved Positive Notification standard. No comments were received on this proposal.

⁵ Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Approving Electronic Data Interchange Test Plans for Account Reinstatement and Utility Bill Ready/Rate Ready Billing Transaction Standards (issued August 14, 2002).

⁶ Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Approving Electronic Data Interchange Standards for Positive Notification and Modifying the Functional Acknowledgement, Application Advice and Utility Bill Ready Invoice Standards (issued November 7, 2002).

Discussion

The update appears to be a reasonable way to streamline EDI testing procedures for this billing model and will be approved.

Single Retailer Model

When the Single Retailer model is used, the traditional utility generally provides its delivery services to the Single Retailer entity that, in turn, serves the customer; the customer has a business relationship with only the Single Retailer (for both energy and delivery) and not with the traditional utility company. Billing and payment processing is, by definition, the responsibility solely of the Single Retailer that serves the customer. In this model, the utility transmits an Invoice transaction to the Single Retailer applicable to a particular customer, either in the form of text to be displayed on the bill or in the form of bill data to be calculated based on the Single Retailer's rate schedules. The 810 Invoice standard for this model was previously approved and test plans were developed and circulated for comment.

Remittance Procedures

With regard to remittance procedures, an 820 Remittance transaction is customarily used by the party issuing the consolidated bill to notify the non-billing party of the receipt and transmittal of their share of customers' payments in account level detail. The EDI Collaborative recommended that the Commission authorize non-EDI procedures for this model because the Utility does not require an 820 describing remittances at the account level. In its view, the number of payment transactions initiated by an ESCO in this model is not high enough to justify the cost of the additional programming that would be necessary to send this payment information in an EDI transaction. In its comments, RG&E supported the EDI

Collaborative recommendation to use non-EDI procedures for this model.

Discussion

The recommendation of the EDI Collaborative will be adopted except that some minor modifications will be made in the document that was filed to remove certain conditional language.

Test Plans

To support this model the 810 Invoice Transaction Standard provides for three different types of electronic invoices to be sent from the Utility to an ESCO acting as a Single Retailer - an End Use Retail Customer Cycle Invoice (delivery charges by customer account for a cycle), an End Use Retail Customer Calendar Month Estimate Invoice (delivery charges by customer estimated by calendar month) and an ESCO Summary Invoice (contains all charges due and payable for an ESCO for a period). Accordingly, individual test plans, developed for each type of invoice, were circulated for comment among the parties. No comments were filed regarding either the initial test plan for the TS810 Invoice Standard - Single Retailer Model or the revised test plans for the TS867 Monthly Usage Standard.

Discussion

Since the ESCO/Marketer serving as a Single Retailer is the only entity issuing bills to a retail customer, the content of the customer's bill is limited to data either transmitted to the ESCO/Marketer by the Utility or obtained directly from the customer. In order for customers served by a Single Retailer to receive a level of bill detail that is comparable to the level currently provided in either a utility bundled bill or a consolidated bill rendered by the Utility, it was necessary to modify the TS867 Monthly Usage Transaction

Standard to permit meter readings and/or additional billed consumption data to be transmitted in that transaction⁷. Corresponding changes in the test plans that reflect scenarios involving an 867 Monthly Usage transaction are now necessary. Both test plans will be approved as proposed.

TS810 Invoice for ESCO Consolidated Billing

Development of the EDI data standards to support consolidated billing was deferred pending the adoption of final business rules for consolidated billing in March 2002⁸. The Uniform Practices for Billing and Payment Processing presume that EDI will be used to exchange billing and payment data for the bill models described in the Uniform Business Practices, which are not applicable until EDI is available and operational for a bill model⁹.

Discussion

The ESCO Bill Ready model is the only model for which EDI standards have not yet been approved. For several reasons, however, many of which were raised in parties' comments, the TS810 Invoice Standard for ESCO Bill Ready cannot be adopted at this time. Most of the parties, including the only ESCO/Marketer providing comments, recommended that the EDI Collaborative be allowed to reconvene and further develop the 810 Invoice standard for ESCO Bill Ready. Con Edison seeks clarification of the utility obligation, implied in the Uniform

⁷ Case 98-M-0667, In the Matter of Electronic Data Interchange, Order Modifying Electronic Data Interchange Standards for Monthly Usage and Enrollment (issued November 26, 2002).

⁸ Case 98-M-1343, In the Matter of Retail Access Business Practices and Case 99-M-0631, In the Matter of Customer Billing Arrangements (issued March 14, 2002).

⁹ Ibid., Appendix A, p. 1.

Business Practices, that utilities must be ready to allow an ESCO to issue consolidated bills upon sufficient notice.

Currently, customers may receive ESCO consolidated bills when an ESCO and a utility agree to a 'billing agency' arrangement¹⁰. Until a suitable TS810 Invoice standard for ESCO Bill Ready can be adopted and tested, any currently established billing agency arrangement, or any other non-EDI method currently in place to enable ESCOs to issue consolidated bills should continue.

For purposes of clarifying the text of the Billing Practices, EDI is to be considered available and operational for the utility rate ready, utility bill ready, and dual billing models¹¹ with the issuance of this order. The EDI Collaborative is to be commended for its efforts to develop the consolidated billing and payment processing transactions completed to date.

The EDI Collaborative is directed to file with the Secretary revised data standards for the ESCO Bill Ready model by October 1, 2003 or sixty days following a request from any eligible ESCO indicating its desire to implement an EDI ESCO Bill Ready model, whichever is sooner. In its revised filing, the Collaborative must identify and provide its rationale for any differences, such as those raised by NYSEG in its comments, in the content and/or structure of its revised ESCO Bill Ready

¹⁰ Under such an arrangement, the customer authorizes an ESCO to act as its billing agent, the utility transmits the customers' bills to the ESCO who consolidates the utility and ESCO charges and rebills the entire amount to the customer.

¹¹ The Practices are not applicable to the Single Retailer model, but utilities that wish to offer that model are required to implement EDI for exchanging data necessary for that model to be functional and operational.

Implementation Guide and New York Utility Bill Ready standard or national standards promulgated by the Utility Industry Group.

We expect that some of the issues raised by the parties in their comments, particularly issues about ESCO consolidated bills for customers on utility deferred payment agreements, may be resolved by initiatives that are currently pending in other proceedings. Accordingly, we expect Staff to keep the Collaborative apprised of the outcome of these initiatives as further development of this model proceeds.

Miscellaneous Housekeeping Changes to Filed Documents

Certain miscellaneous housekeeping changes have also been required on the documents to achieve consistency between the documents approved herein and New York data standards previously adopted by the Commission, national EDI data standards published by the Utility Industry Group (UIG), and regional standards in place in the Mid-Atlantic states. The approved documents listed in the Appendix reflect these miscellaneous housekeeping changes.

The Commission orders:

1. The TS568 Account Receivables Advisement transaction standard is adopted with modifications as discussed herein.

2. The TS568 Payment Advisement transaction standard is adopted with modifications as discussed herein.

3. A revised Implementation Guide for the TS810 Invoice - Utility Rate Ready Billing is adopted with the modifications discussed herein.

4. Updates to the existing EDI test plans associated with implementation of the Utility Bill Ready consolidated billing model are adopted.

5. Remittance procedures for the single retailer model are adopted with modifications as discussed herein.

6. The test plans for the single retailer model are adopted.

7. This proceeding is continued.

By the Commission,

(SIGNED)

JANET HAND DEIXLER
Secretary

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

Supplement	Description
SUPPLEMENT A	<ul style="list-style-type: none"> • TS568 Account Receivables Advisement Implementation Guide • Account Receivables Advisement Business Processes - Utility Rate Ready Consolidated Billing Model
SUPPLEMENT B	<ul style="list-style-type: none"> • TS568 Payment Advisement Implementation Guide • Payment Advisement Business Processes - Utility Rate Ready Consolidated Billing Model
SUPPLEMENT C	<ul style="list-style-type: none"> • TS810 Invoice - Utility Rate Ready Billing Implementation Guide, Version 1.1 • TS810 Invoice - Utility Rate Ready Data Dictionary, Version 1.1
SUPPLEMENT D	<ul style="list-style-type: none"> • Single Retailer Remittance Procedures
SUPPLEMENT E	<ul style="list-style-type: none"> • Technical Operating Profile, Version 1.1 (Processing Architecture; Phase I & Connectivity Testing)
SUPPLEMENT F	<ul style="list-style-type: none"> • Technical Operating Profile, Supplement 1, Version 1.1 (Connectivity Tests; Phase II and III Test Scenarios for 814E, 814D, 814HR, 867HU and 867MU Transaction Set Standards)
SUPPLEMENT G	<ul style="list-style-type: none"> • Technical Operating Profile, Supplement 4, Version 2.0 (810 Invoice Utility Consolidated Billing)
SUPPLEMENT H	<ul style="list-style-type: none"> • Technical Operating Profile, Supplements 7a, 7b & 7c, Version 1.0 (Single Retailer, 810 Invoice test plans)