

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on August 20, 2009

COMMISSIONERS PRESENT:

Garry A. Brown, Chairman
Patricia L. Acampora
Maureen F. Harris
James L. Larocca, recused

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

ORDER MODIFYING ELECTRONIC DATA INTERCHANGE (EDI)
STANDARDS AND TEST PLANS
FOR UTILITY BILL READY BILLING

(Issued and Effective August 26, 2009)

BY THE COMMISSION:

INTRODUCTION AND SUMMARY

In Opinion 01-03¹ the Commission directed distribution utilities and energy service companies (ESCOs) to implement Electronic Data Interchange (EDI) systems to ensure uniformity in the business communications between ESCOs and utilities in New York. Since 2002, seventeen transaction set standards² have been developed, adopted and implemented. Since 2005 the Commission has approved modifications in EDI transaction set standards and related test plans as necessary to recognize statutory or regulatory changes reflected in the Uniform Business Practices, to accommodate changes in retail access market structure or at the request of specific parties. In this order, modifications to the EDI standards for Bill Ready consolidated billing are

¹ Case 98-M-0667, Electronic Data Interchange, Opinion No. 01-03 (issued July 23, 2001).

² A transaction set standard is normally comprised of an implementation guide (technical rules associated with a transaction), a data dictionary (clarifying the unique use of data segments or elements by specific parties) and a business process document.

considered and adopted. These changes were initiated at the request of The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York and KeySpan Gas East Corporation d/b/a KeySpan Energy Delivery Long Island (KEDNY/KEDLI)³ to facilitate ESCO compliance with revised regulations issued in June 2004 which require ESCOs serving residential customers to comply with the provisions of the Home Energy Fair Practice Act (HEFPA)⁴. Specifically, ESCOs serving residential customers must offer budget plans and display the status of these plans on customer's bills. Part 11.16 (c) of these regulations pertaining to the contents of bills requires, in part, that bills issued under a budget or other levelized payment plan must display the sum of the actual and budget amounts billed to date as well as the difference (credit or debit) between these amounts. As a result of these changes, ESCOs will need to maintain records on the status of their residential customer budget bill plans to provide the required data to Bill Ready utilities.

NOTICE OF PROPOSED RULEMAKING

A Notice of Proposed Rulemaking concerning the EDI changes under consideration was published in the State Register on April 29, 2009 [SAPA 98-M-0667SP58]. The minimum period for

³ These companies also do business under the name "National Grid".

⁴ Case 03-M-0117, Implementation of Chapter 686 of the Laws of 2002, Memorandum and Resolution Adopting Amendments to 16 NYCRR PARTS 11 AND 12 (issued June 9, 2004).

the receipt of public comments pursuant to the State Administrative Procedure Act (SAPA) regarding that notice expired on June 15, 2009. Comments pertaining to the implementation time-table for these changes, discussed below, were received from New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation (NYSEG/RG&E).

BACKGROUND

By an order issued in Case 99-M-0631⁵ the Commission directed major gas and electric utilities to offer consolidated billing (both delivery and commodity services on one bill regardless of supplier) to their retail access customers. In May 2001⁶ the Commission incorporated uniform retail access billing and payment processing procedures into the Uniform Business Practices. Those procedures provided that either the distribution utility or the ESCO, in the role of the billing party, may issue the consolidated bill; and the billing party could choose either the 'Bill Ready' or 'Rate Ready' method for consolidated billing. In the 'Bill Ready' model, the non-billing party calculates their customer's charges and transmits the billing data to the billing party for presentation on the consolidated bill. Under the 'Rate Ready' method the billing party would calculate the non-billing party's charges, based on 'rates' provided by the non-billing party, and present the charges on the consolidated bill. Implementation of these procedures was delayed pending the transition to uniform statewide EDI transaction standards for the exchange of retail access data between distribution utilities and ESCOs.

⁵ Case 99-M-0631, Customer Billing Arrangements, Order Providing for Customer Choice of Billing Entity (issued March 22, 2000).

⁶ Cases 99-M-0631 and 98-M-1343, Customer Billing Arrangements and Retail Access Business Practices, Order Establishing Uniform Retail Access Billing and Payment Processing Practices (issued May 18, 2001).

In subsequent orders, issued between 2002 and 2004, the Commission adopted (a) the EDI transaction standards necessary for implementation of the Utility Bill Ready and Rate Ready models, (b) technical operating protocols governing connectivity and security, (c) Phase III test plans and (d) established EDI testing deadlines for utilities and ESCOs. By the end of 2004, distribution utilities had functioning systems in place and most active ESCOs had completed the requisite testing. In 2006 most transaction standards and test plans⁷ were updated to comply with Uniform Business Practices modifications and to accommodate the ESCO Referral and Purchased Receivables programs.

In the recent Retail Access Review Order⁸ the Commission recognized that EDI systems and Uniform Business Practices are essential to maintaining a competitive market in New York. Accordingly, it is important that market participants continue to comply with the New York EDI standards and that the standards and system protocols be kept current.

SUMMARY OF CHANGES AND DISPOSITION OF COMMENTS

KEDNY/KEDLI request changes in the TS810 Bill Ready (Invoice) Standard to enable ESCOs to transmit to the distribution utility budget bill data for presentation on the ESCO portion of the customers' consolidated bill. KEDNY/KEDLI propose to add two new data segments to enable ESCOs to transmit cumulative actual charges and budget plan installments billed to

⁷ The standards for the Bill Ready and Single Retailer bill models did not require updates at that time.

⁸ Case 07-M-0458, Competitive Retail Energy Markets, Order Determining Future of Retail Access Programs (issued October 27, 2008).

date for presentation on the ESCO/Marketer portion of a residential customer's consolidated bill when that customer is on a budget plan for ESCO/Marketer charges. In addition, Staff revised the Bill Ready standard and related documents (listed in Attachment A) to conform the text of other budget bill data segments and certain explanatory notes to ensure compliance with revised HEFPA regulations and to reflect updates to the Uniform Business Practices that have been adopted since the Bill Ready standard was originally issued. The new and revised segments are:

- Budget Plan Cumulative Difference (revised)
- Budget Plan Actual Charges Billed to Date (new)
- Budget Plan Installments Billed to Date (new)
- Budget Plan Current Month Difference (revised)

In addition, Example Scenario 1 in version 1.1 of the standard has been deleted, Example Scenario 2 has been updated to reflect the use of the new segments, and the dates in all examples have been updated to 2009. Staff also amended the test plans for the Bill Ready standard to reflect the new and revised segments.

The addition of the new budget plan segments is supported by NYSEG/RG&E who point out that the addition of these segments should eliminate ESCO concerns regarding transmission of this budget data. According to NYSEG/RG&E, ESCOs have had to place free form text in the 'bulletin board' section of the bill in order to currently provide this information. NYSEG/RG&E recommend that once the programming necessary to add the new segments has been completed, Phase II testing with an experienced ESCO should be conducted before full scale Phase III

testing is conducted with the remaining ESCOs active in their service territories. NYSEG/RG&E request that sufficient time be granted to implement these changes because they require changes in their existing billing systems to enable processing and billing of the information.

Discussion

We agree with the testing approach suggested by NYSEG/RG&E. EDI policies previously adopted require incremental Phase III testing whenever new EDI transaction standards or significant changes in existing standards are adopted⁹. In this instance, Staff advises that incremental testing can be limited to replicating the test of Scenario BRI003 as described in version 3.1 of TOP Supplement 4.

With regard to an appropriate implementation time-table for these revisions, none of the affected utilities has provided a firm estimate of the time necessary to complete the programming changes in their own systems before they will be ready to conduct testing. However, we are concerned that ESCO customers on budget plans in these service territories may not be receiving adequate information on the status of their budget plans, particularly gas customers who will be entering into new plan arrangements in the upcoming heating season. Accordingly, an attenuated implementation time-table would not be in the best interests of customers.

⁹ Version 1.2 of Supplement 1 of the Technical Operating Profile (TOP) document states "As new EDI transaction standards and related test procedures are adopted by the Commission, all parties will be required to successfully complete testing on these new transactions"(page 3).

The Commission orders:

1. The standards documents listed in Attachment A to this order are approved.

2. The Brooklyn Union Gas Company d/b/a KeySpan Energy Delivery New York (KEDNY), KeySpan Gas East Corporation d/b/a KeySpan Energy Delivery Long Island (KEDLI), New York State Electric & Gas Corporation (NYSEG) and Rochester Gas and Electric Corporation (RG&E) are directed to complete incremental Phase II EDI testing for the transmittal of budget data on or before November 2, 2009.

3. KEDNY, KEDLI, NYSEG and RG&E are directed to commence Phase III testing with its active ESCOs by November 30, 2009.

4. The secretary in her sole discretion may extend the deadlines set forth in this order.

5. This proceeding is continued.

By the Commission,

(SIGNED)

JACLYN A. BRILLING
Secretary

The following documents will be available electronically from the Commission's web site at:

http://www.dps.state.ny.us/98m0667_current.htm

Supplement	Description
SUPPLEMENT A	<ul style="list-style-type: none">• TS810 Invoice - Utility Bill Ready Consolidated Billing Implementation Guide, Version 1.2
SUPPLEMENT B	<ul style="list-style-type: none">• TS810 Invoice - Utility Bill Ready Consolidated Billing Data Dictionary, Version 1.2
SUPPLEMENT C	<ul style="list-style-type: none">• TOP Supplement 4 - 810 Invoice Utility Consolidated Billing, Version 3.1