STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service Commission held in the City of Albany on August 14, 2002

COMMISSIONER PRESENT:

Maureen O. Helmer, Chairman

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 and Effective August 14, 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. By this Order, test plans are approved for the 814 Reinstatement Transaction Standard and the 810 Utility Bill Ready/Rate Ready (UBR/URR) Transaction Standards.[1]

Comments were solicited regarding the development of an 814 Reinstatement Transaction Standard test plan by a notice published in the State Register on June 5, 2002. An EDI consultant, Systrends, Inc. (Systrends), worked with Staff and the EDI Collaborative to fully develop the details of a proposed test plan, which was filed on June 24, 2002. Formal comments were received from Consolidated Edison Company of New York, Inc. and Orange and Rockland Utilities, Inc. (collectively, "Con

[1] The 814 Reinstatement transaction was approved on May 29, 2002. The 810 Utility Bill Ready and Utility Rate Ready transactions were approved on June 21, 2002.

Edison"), New York State Electric & Gas Corporation (NYSEG) and Niagara Mohawk Power Corporation (Niagara Mohawk).

Comments were solicited regarding the development of a test plan for the 810 Utility Bill Ready/Rate Ready Transaction Standards by a notice published in the State Register on May 29, 2002. As with 814 Reinstatement, Systrends worked with Staff and the EDI Collaborative to fully develop the details of a proposed 810 test plan, which was filed on July 17, 2002. Upon request from the parties, the Secretary extended the comment period until July 31, 2002. Formal comments were received on the 810 test plan from Con Edison, KeySpan Gas East Corp. (KeySpan), NYSEG[2] and Niagara Mohawk.

SUMMARY AND DISPOSITION OF COMMENTS

814 Reinstatement Test Plan

Expiration of the Reinstatement Period

Con Edison recommends adding an additional Phase II and III test scenario to the plan to test a rejection of a reinstatement request due to expiration of the reinstatement period. The purpose of this additional test scenario, in Con Edison's view, would be to determine whether the ESCO/Marketer appropriately implemented the Commission-ordered three-day no-action period in its system.

Discussion

Con Edison's recommendation applies to the time period between the date the utility is notified of the customer's decision to rescind enrollment with the new ESCO/Marketer and the date of the pending switch to the new ESCO/Marketer. When this time period is at least three business days, the utility sends a reinstatement transaction to the existing ESCO/Marketer.

[2] NYSEG submitted two sets of comments. Its first set is not further discussed herein because it was fully addressed by changes incorporated into the 810 test plan prior to the plan being filed.

If the time period between the utility's notification and the pending switch date is less than three business days, then the customer must be enrolled with the new ESCO/Marketer for at least one billing cycle (subsequent to which the customer is reinstated with the incumbent ESCO/Marketer). In the case where a utility mistakenly sends a reinstatement transaction when the time period is less than three days, the existing ESCO/Marketer is required to reject the reinstatement request from the utility. This test scenario was not anticipated at the time the test plan was developed by the parties. As there is a possibility this situation may arise, a test scenario for these circumstances is desirable. Test scenario R003 (for testing an erroneous Utility reinstatement request) has been modified to allow the testing of this condition.

Receipt of Reinstatement Transaction

Con Edison comments that due to the possibility of delays in transmittal of transactions over the Internet, problems may result when the incumbent ESCO/Marketer and new ESCO/Marketer receive reinstatements and drop transactions at different times. In particular, Con Edison points out that if one or both ESCO/Marketers do not receive coincident transactions prior to the three-day no-action period, unintended consequences may result. For example, a customer may be dropped but not reinstated; a customer may not be dropped or reinstated; or a customer who was not dropped or reinstated may not be able to take service from the desired ESCO/Marketer. To avoid these situations, Con Edison proposes that the deadline for receipt of the request be extended one day into the no-action period.

Discussion

The Technical Operating Profile (TOP) and TOP, Supplement 1 address EDI transmission problems with detailed failure and fail-over standards and related connectivity testing designed to minimize the consequences such as the ones noted by Con Edison. These procedures are satisfactory for the handling of transmission problems and no changes to the business rules related to reinstatement transaction are necessary.

Other 814 Reinstatement Test Plan Modifications

The following changes to the 814 Reinstatement Transaction Standard test plan have been made in response to submitted comments:

1. In the table of Phase II and III tests (page 5), the description of scenario R0003 (which refers to the customer contacting the utility to rescind enrollment) is re-stated in business days.
2. The “Date Completed” and “Frames” fields are removed, and the “Date Completed” field only is placed within each test scenario frame, as is done with the 810 UBR/URR test plan, to denote frame completion dates, as needed.
3. The second sentence of the “Purpose” section is clarified to read “The specifications were developed in accordance with the ongoing work of the New York EDI Collaborative group (the Collaborative), which has primary responsibility for developing the standards for EDI in New York as directed by the New York Public Service Commission.”
4. The following sentence is added to the “End-to-End Testing” section. “Test participants may elect to integrate testing of applicable reinstatement test frames into current test plans (presented in Technical

Operating Profile Supplements 1 and 2) to eliminate duplication of testing efforts".

810 UBR/URR Test Plan

End-to-end testing

Con Edison, Keyspan and Niagara Mohawk each comment that the end-to-end testing approach of the 810 UBR/URR test plan is overly proscriptive and potentially very costly. Con Edison and Keyspan recommend limitation of the test plan to the exchange of data related only to the 810 invoice and against approval of the test plan as filed. Niagara Mohawk recommends clarification of the document to state that the end-to-end testing described is appropriate for participants who have not completed any EDI testing and for whom end-to-end testing makes the most sense. Niagara Mohawk further recommends the approach for completing the 810 tests be determined by mutual agreement between the trading partners.

Discussion

End-to-end testing is an approach that is logical, comprehensive and integrated. Niagara Mohawk is correct in drawing a distinction, however, between testing that occurs during the transition to EDI and testing expected to occur after EDI has been implemented by the utilities. Testing during the transition period is necessarily iterative, due to the nature of developing, approving and testing the data standards. In contrast, after implementation is completed, ESCOs/Marketers who later move to EDI (possibly because they have waited until such time or because they are new to the New York market) will be able to use the end-to-end approach through a logical progression of transactions. All parties must test all the EDI standards as specified in the various test plans. However, as stated in the TOP, the utility has "primary responsibility for specifying volumes and variations of tests to be completed."

This general principle applies to the execution of end-to-end testing. In the post-transition period, particularly, the utilities will be expected to test ESCO/Marketers using the end-to-end approach documented in the test plans. However, the execution details are left to the utility. The test plan has been modified to more clearly express these concepts.

Testing of the 824 Application Advice

NYSEG proposes to test and implement its consolidated utility bill ready model only when the 824 Application Advice transaction standard for both rejection and acceptance of an ESCO/Marketer's invoice is completed. NYSEG argues that testing in this manner is the most efficient use of the utilities and ESCO/Marketers time and resources "and most effective means of meeting the tight time schedule" to implement utility consolidated billing.

Discussion

By Order issued on July 31, 2002, the 824 Application Advice transaction standard for invoice rejection was approved, and the necessary invoice rejection scenarios have been added to the test plan. However, the positive 824 transaction standard has not yet been approved and the related test plan has not been developed.[3] The New York EDI transition has fundamentally taken a "building blocks" approach and the consolidated billing transactions are an example of this. Upon full EDI implementation, an end-to-end testing approach is appropriate for all new ESCO/Marketers entering the market, but during the transition period, a balanced approach is needed. In this case, the need to commence EDI billing invoice testing outweighs the need to wait for the 824 positive transaction standard and

[3] The 824 Application Advice for Positive Notification of an 810 invoice was filed for approval on August 1, 2002.

related test scenarios to be adopted. Therefore, all parties must proceed with testing as specified. In addition, as approval of the 824 transaction standard for positive acceptance of invoices is expected shortly, all parties should plan on accommodating this transaction in the near future.

Other 810 UBR/URR Test Plan Modifications

A footnote has been added to the test plan on the Phase I test page which indicates the terms “February”, “January” and “December” are used in an illustrative sense and that the actual submitted tests can be structured using other, acceptable billing periods.

It is ordered:

1. The 814 Reinstatement Test Plan and the 810 Utility Bill Ready/Rate Test Plan are adopted with modifications, as discussed herein.

2. All affected parties are directed to commence Phase I testing of the 814 Reinstatement Test Plan and the 810 Utility Bill Ready/Rate Ready Test Plan within 45 days of the issuance of this Order.

3. This proceeding is continued.

(SIGNED) _____
Commissioner

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	• TOP Supplement 3 – 814 Reinstatement Test Plan
SUPPLEMENT B	• TOP Supplement 4 – 810 UBR & URR Test Plan