

STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

At a session of the Public Service
Commission held in the City of
Albany on October 24, 2001

COMMISSIONERS PRESENT:

Maureen O. Helmer, 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 EDI TEST PLANS AND DATA STANDARDS

(Issued and Effective November 8, 2001)

BY THE COMMISSION:

INTRODUCTION

Electronic Data Interchange (EDI) is the computer-to-computer exchange of routine business information in a standard form. On July 10, 2001, the New York EDI Collaborative (Collaborative) filed for Commission approval a proposed EDI account maintenance data standard as well as documents containing the Collaborative's recommended procedures regarding staged EDI testing between market participants. The EDI data standard and related business processes were described in three documents: the Account Change Business Process, the 814 Change Data Dictionary, and the 814 Change Implementation Guide. The Test Plans for Phase II (Utility Readiness) and Phase III (ESCO/Marketer Verification) were documented in the Technical Operating Profile, Supplement 1 (or TOP, Supplement 1). In addition, the Collaborative also developed an EDI Glossary of

Terms, defining terms used in the various EDI documents completed to date.

Comments were solicited on these filings by a notice published in the State Register on July 11, 2001. Comments were received from Consolidated Edison Company of New York, Inc. (Con Edison), New York State Electric & Gas Corporation (NYSEG), Niagara Mohawk Power Corporation (Niagara Mohawk), and Rochester Gas & Electric Corporation (RG&E).¹

DISPOSITION OF COMMENTS

Phase II & III Test Plans

Data Transfer Mechanism (DTM) Testing

Con Edison comments that "although the Collaborative Technical Operating Profile indicates that the DTM will be tested in Phase 1, Supplement 1 provides no information on this point and neither the main document nor this Supplement provides any real detail of how the test will be performed or what documentation will be required. It is imperative that this document be clarified in these respects in order for testing to be meaningful."

The TOP, Supplement 1 does not require revision to address Con Edison's concerns. The Technical Operating Profile, approved in Opinion and Order 01-03 issued on July 23, 2001, clearly provides DTM test scripts and procedures that each company must complete and affirm internally. Successful testing of DTM capability is required as a pre-requisite to entering Phase II or III testing and the TOP, Supplement 1 requires the submission of a pre-test worksheet, where each company attests to its readiness for Phase II or III testing and notes any

¹ RG&E's comments were limited to a status report on its implementation efforts and will not be addressed here.

exceptions. The documentation already required by the procedures described in the TOP and its supplement are sufficient, and no revisions are necessary at this time. Further, the EDI Collaborative parties are free to meet, discuss, and resolve problems that may arise regarding connectivity testing and this approach would be more meaningful than the unspecified modifications sought by Con Edison in its comments.

Connectivity Testing

Con Edison comments that "The Supplement (at page 8) is not clear regarding when Connectivity testing will occur. This should be clarified and added to the sections on Phase II testing (at page 5) and Phase III testing (at page 6) if appropriate."

As directed in Opinion and Order 01-03 and specified in the TOP, all market participants are required to establish and self-test the New York Data Transfer mechanism as part of Phase I testing. In addition, based on the proposed procedures outlined in the TOP, Supplement 1, Phase II or III Connectivity Tests between each utility and E/M clearly must be successfully completed prior to engaging in the Enrollment, Monthly Usage, or Special Situations tests. The detailed timeframes for the Connectivity Tests, as well as testing schedules in general, are expected to vary by each utility based on the pace of their implementation efforts.

Revision of EDI standards and related testing requirements

NYSEG raises several issues regarding subsequent revision in approved NY EDI data standards, testing requirements, and EDI "certification" and "re-certification". First, NYSEG recommends that the Overview section of the TOP, Supplement 1 be modified to clearly state that subsequent changes in EDI standards and protocols should not require

"re-certification" of utilities and E/Ms. NYSEG comments that the Overview sections should clearly state that the Change Control Process is the vehicle to complete standards revisions and, further, that the EDI Collaborative should develop the necessary change control processes to accomplish this.

We agree with NYSEG's recommendation that the TOP, Supplement 1 be modified to clearly state that the Change Control Process, when implemented, will be the process to handle EDI data standard revisions on an ongoing basis. However, with regard to certification, companies will become Phase I-certified through Phase I testing conducted and certified by Staff. In addition, successful Phase II and III testing does not constitute "certification" by Staff, but rather is completed through trading partner testing and exchange of attestations by trading partners that all testing was accomplished successfully. We agree with NYSEG that it may not be necessary, in general, to conduct Phase I testing for standards that are subsequently modified in the future. However, companies will still be required to implement new EDI transactions (including all related testing requirements) and to maintain compliance with New York approved EDI data standards as they are revised and updated in the Change Control process. All of these concepts were already clearly articulated in the filed TOP, Supplement 1 and no further elaboration on this point is necessary.

In addition, in cases where a third party is providing EDI services on behalf of an E/M or utility², NYSEG argues that a change in a party's EDI vendor should require the E/M or utility to re-establish successful testing "sign-off" between testing

² Third party EDI suppliers are companies who offer an increasingly wide range of EDI services including transaction clearinghouses and outsourcing of EDI systems.

entities. The TOP, Supplement 1 documents the Phase I certification process but does not specifically address the role of these third party EDI suppliers. Accordingly, an entity's Phase I certification should be reviewed when it has contracted with a new EDI third party supplier. In addition, trading partner testing and attestations should also be completed with all new companies involved. The TOP, Supplement 1 will be revised to reflect this requirement.

Occurrence of Phase II Testing

NYSEG seeks modifications in the language in the Overview section of the TOP, Supplement 1, regarding "Phase II: Verification of Utility Readiness" which states: "It is expected that Phase II testing will only be necessary for initial implementation of transaction standards" and "For example, the initial Enrollment transaction filed in October 2000 will be Phase II tested during year 2001 only, unless those transactions change in the future and the Collaborative determines that Phase II testing is necessary." NYSEG believes the following language should be substituted: "Phase II testing will only be necessary for initial implementation of standards. A utility that has been Phase II-certified will not be required to repeat Phase II testing."

It is implicit in the description of Phase II testing that such testing was designed to ready each utility for initial implementation of a specific transaction standard and therefore, it is unlikely, short of a significant structural change in a specific standard, that Phase II testing on any transaction standard will be necessary more than once. However, it would be premature to definitively state at this juncture that Phase II testing will never have to be repeated for any standard. Accordingly, NYSEG's request for modification is rejected.

Occurrence of Phase III Testing

NYSEG recommends modifying the language in the Overview section of the TOP, Supplement 1, under the sub-section titled "Phase III: E/M Verification Process", to state "An E/M that is Phase III certified will not be required to repeat Phase III testing". We believe this was the expectation of the Collaborative parties in developing the Phase III procedures. NYSEG, however, is correct that, unlike Phase II testing, no statement to this effect was included in the TOP, Supplement 1. Therefore, the TOP, Supplement 1 will be revised to state that "E/Ms will generally not be required to repeat successful Phase III testing, except, as noted above, in situations when there has been a change in third party EDI supplier".

Phase III Test Procedures

In Section IV, "Phase III Testing Procedures" (page 6) the specific transactions to be tested during Phase III are listed. NYSEG recommends adding language that would expand the scope to include: "...and any additional transactions ordered by the PSC and identified as required for inclusion in Phase III testing by Change Control." The fact that additional approved transactions would necessitate additional Phase III testing is already sufficiently documented in the Overview section, and no revision is necessary on this issue.

Test Scheduling

In Section V, "Test Scheduling", procedures and guidelines for coordination and scheduling of testing activities are described. NYSEG believes the following text should be modified - "Except for the initial implementation period, and periods in which new transactions are being introduced, Utilities are expected to begin testing within 60 calendar days of an E/M's request" - by removing references to initial implementation and new transactions. NYSEG proposed new text - "Utilities are expected to begin testing within 60 days of an

E/Ms request" - and also recommends deleting the related footnote ("Initial implementation is considered the period of time when the first group of transactions is implemented...new transactions...may also warrant flexible test schedules when initially implemented."). NYSEG argues this footnote is not necessary because "new transactions should be performed through the change control process." Finally, NYSEG recommends deleting the following text altogether: "During the initial implementation period and periods in which new transactions are being introduced, some flexibility in scheduling Phase III testing is needed in order to ensure that testing with each trading partner is completed in a rigorous and planned manner and that no party is unduly burdened."

The revisions sought by NYSEG are unwarranted. With regard to initial implementation and new transactions, the Collaborative's intent is clear that flexibility in testing and implementation will be needed and the existing text states this fact clearly. Although change control will be the process for modifying existing EDI standards, references to testing new transactions should remain in the TOP and TOP, Supplement 1 as these documents are the primary technical and testing documents for EDI in New York.

Type of E/Ms eligible to participate in Phase III Testing

In its comments, NYSEG voiced concern with the use of the phrase "do business in that Utility's service territory" in defining the E/Ms who will be required to conduct Phase III testing. In its view, the phraseology is ambiguous and should be clarified. NYSEG suggests that the text in this section should reflect the concept that testing is required only for E/Ms approved to participate in the particular utility's gas or electric retail access programs.

We agree with NYSEG and this revision shall be made to the TOP, Supplement 1.

Trading Partner Notification and use of Trading Partner Agreements (TPAs)

NYSEG recommends that TPAs would be a "good vehicle to ensure that trading partners have satisfied Phase III test requirements and to govern notifications" between utilities and E/Ms upon the successful completion of those requirements. We will make no revision at this time as the use of Trading Partner Agreements is still under consideration.

814 Change Transaction Standard

Budget Bill Status

Con Edison comments that the business processes regarding budget billing require clarification to indicate that budget billing status information is not required to be sent when the billing party does not offer such special billing arrangements. Con Edison is correct that the billing party is not obligated to offer special billing arrangements such as budget billing. We agree clarification is necessary in light of the Uniform Business Rules for Billing & Payment Processing adopted on May 18, 2001, and the documents have been revised accordingly.

In its comments, Niagara Mohawk seeks confirmation of its understanding that a request to change a customer's budget bill status affects only the treatment of the senders, and not the recipients, charges. The 814 Change Implementation Guide on page 27 makes it clear that a change in budget bill status applies only to the senders charges, and no change is necessary on this point.

Limitations on the use of Effective Date of Change

Con Edison notes that the 814 Change data standard limits the use of the Effective Date of Change parameter to

either utility requests or responses or E/M initiated requests under the Single Retailer Model. In Con Edison's view, the E/M should be allowed to establish the effective date in Multiple Retailer situations when the change requested is a change in the E/Ms price or rate code and the applicable utility is willing to process such changes between bill cycle dates.

Con Edison's suggestion is reasonable and can be accommodated as long as the structure of the 814 Change data standard provides a means for utilities who render rate ready consolidated bills but are not capable of processing interim price/rate changes to reject a E/M request. Where such change requests will be accepted but the effective date requested by the E/M cannot be accommodated, the effective date sent on the utility response transaction should be the controlling date for implementing the requested change. Both the 814 Change Data Dictionary and 814 Change Implementation Guide will be revised to document this concept.

Use of Reason for Change Code

Con Edison argues that the code for "Change in Effective Date" (page 17 of the 814 Change Implementation Guide) should be deleted from the standard because it is not a valid "reason for change." The "Change in Effective Date" code was included initially as a "reason for change" to enable parties to communicate a new effective date for a change that had previously been sent and had already been processed by the recipient. However, this approach presumes that both the sender and receiver are capable of linking the first change transaction, which contained the data to be changed, with the second change transaction, which contains the new effective date. The Account Change Business Process document does not contain sufficient detail to determine how changes in effective dates should be handled, and until the Collaborative clarifies

the business process regarding this data parameter, no changes on this point should be reflected in the approved documents.

Use of Meter Number

Notes in the 814 Change Implementation Guide indicate that new and old meter numbers must be provided when meters are being exchanged. Con Edison comments that it is currently reviewing its process and customer information system with respect to this requirement and asserts that the changes required to implement this requirement will be significant. Con Edison requests the opportunity to object to this requirement.

With regard to the exchange of usage data measurements, the structure of all EDI transactions requires that a "label" or ID element be established for each metered (or collectively unmetered service) in order to provide a structure to report subsequent changes regarding the meter or the manner in which consumption is measured on an account. These identifying labels are typically either a meter number, a service delivery point ID, or use of the text label "ALL". The label is the means used to describe changes in how usage will be measured and is fundamental to the transactions.

With regard to a meter exchange on an account, when a meter is subsequently replaced with a new meter but the usage measurement data will not change it may not be necessary in the short term to report this meter exchange to the E/M. If however, the usage measurements for the new meter will be different than the old meter, the Change transaction must have a "label" for the new meter in order to provide a description of the new usage measurements. In the short term, that label does not have to be the actual meter number of the new meter but may be a generated service delivery point ID (or some other suitable alternative) as long as there is a system link between the identifying parameter that is generated and the actual meter

number. Eventually, however, a consistent link between a utility's Customer Information System (CIS) and meter data systems will be necessary in order to accommodate competitive meter providers. Therefore, while no specific revisions are necessary at this time, we have provided clarification as discussed above, stressing the need in the long term for utilities to build consistent links between their CIS and meters data systems.

Assigned Service End Date

In its comments, Con Edison seeks a change in the business process rule governing the process for notifying an E/M of the date on which responsibility for the customer's commodity supply will shift from one supplier to another (known as the service end date).

The Assigned Service End Date, with certain exceptions, is the customer's next regularly scheduled meter read date. It is common for the actual meter read date on an account to vary from one to three days from the scheduled date and the business rule, as presently proposed in the 814 Change Implementation Guide, does not require changes in service end dates to be communicated unless the new date varies by more than 3 days from the original date provided. This rule would minimize the number of change transactions that would need to be generated.

Con Edison believes that any change in the original service end date for a customer should be sent to the E/M. The current rule as proposed does not preclude a specific utility from notifying an E/M of any change in the Assigned Service End Date and therefore the text of the 814 Change Implementation Guide does not require modification. The documents presented by the Collaborative are, however, silent regarding the treatment of differences in the service end date originally provided to

the E/M (sent in the 814 Drop transaction) and the actual service end date with regard to settlement and balancing activities.

A key issue is which entity (utility, current E/M or new E/M) is responsible for commodity supply for the customer for the number of days between the assigned service end date originally communicated to the E/M and the actual service end date. The Collaborative shall provide clarification of the business process in the comments section of its Account Change Business Process document for process AC 1.0 ("Change in Service Start/End Date") and file the revised document with the Secretary for posting on the Commission's web site.

Uniform Business Practices (UBP) Modifications

NYSEG comments that the Account Change business processes should be modified to take into account the Commission's order adopting Uniform Business Rules for Billing and Payment Processing Practices issued May 18, 2001. NYSEG requests that the Commission authorize the EDI Collaborative to revise the Business Processes accordingly.

The Account Change Business Process document shall be updated to reflect the Billing and Payment Processing Rules applicable to EDI. The document is revised to reflect the recently adopted rules regarding billing and payment processing. The modified document is adopted with the understanding that, as NYSEG has indicated, further revisions may be necessary once the data standards to support the billing and payment processing rules have been developed.

Mailing Address Changes

Con Edison comments that mailing address parameters should not be limited to consolidated billing scenarios, and that the documents should be modified to indicate these parameters may be sent whenever a change occurs. The documents

as proposed do not preclude either party from sending a change in mailing address when the customer is not receiving a consolidated bill, hence Con Edison's request may be accommodated with no change in the technical documents.

Use of Multiple Account Numbers in a Change Transaction

Con Edison comments that "since the validation account number appears in the LIN³ loop, it is possible that more than one account number may appear in the transaction. Since the process rules indicate that changes for only one account can be contained in one transaction, an error message should be included for this possible event." Con Edison recommends an error message should be added to the standard reading "Multiple accounts included in transaction."

No revision is necessary. As presently structured, an 814 Change Request transaction may appropriately contain several utility account numbers since, as Con Edison points out, each change request must be sent in a separate LIN loop, with each loop identified by account number. Therefore it would be inappropriate to reject a Request transaction because it contains "multiple account numbers". If a specific account number in a Request transaction is in error, that individual request may be rejected and the list of reject reason codes is already adequate to accommodate this circumstance.

Tax Parameter Specificity

Con Edison comments that the tax exemption parameter in the proposed Change transaction is not adequate to provide all of the tax data necessary for the utility to calculate the E/M charges in a consolidated billing scenario. For example, certain customers in the residential service class may be exempt

³ A LIN loop is a standard, fundamental EDI programming structure.

from state sales taxes but may not be exempt from local sales taxes. Con Edison requests that the parameter be revised, or an additional segment added, to provide more flexibility.

To avoid confusion, the Account Change Implementation Guide and Account Change Data Dictionary shall be clarified to state that the tax exemption status pertains to state sales taxes and that it must be sent when the utility is the bill calculator.

With regard to local sales or other taxes, if commodity charges are subject to certain local taxes, irrespective of whether the utility or the E/M is providing supply, then there is no need for the EDI transaction to contain additional tax data on these local taxes. However, if there are differences in applicable local taxes based on who is providing the supply, then Con Edison is correct that additional data parameters would need to be added to convey this information. Further, these parameters would also need to be added to the 814 Enrollment Request transaction standard. Therefore, revisions to the Enrollment and Change standards to accommodate more complexity in the tax data shall be deferred pending the development of the transaction standards necessary to support consolidated billing scenarios reflected in the Uniform Business Rules on Billing and Payment Processing.

E/M Price Parameters

Con Edison comments that two parameters, E/M Commodity Price and E/M Fixed Charge should be conditional on the utility response to allow, but not require, the utility to confirm price information. In the revised documents the use of these parameters will be changed to optional to permit a utility to return and confirm this data on its response transaction.

Miscellaneous Housekeeping Changes to Filed Documents

Housekeeping changes are required and will be made 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.

CONCLUSION

The Technical Operating Profile, Supplement 1, the Account Change Business Process, the 814 Change Data Dictionary, the 814 Change Implementation Guide, and the EDI Glossary Of Terms, are approved as discussed above.

The Commission orders:

1. All affected parties are directed to comply with the Phase II and III testing procedures as outlined in Supplement 1 of the Technical Operating Profile document.
2. The Collaborative shall file Phase I, II, and III test scenarios for the 814 Change Transaction within 30 days of issuance of this Order.
3. The Collaborative is directed to further detail the process to be used by the parties to communicate a change an effective date.
4. The Collaborative shall provide clarification of the business process, as discussed herein, in the comments section of its Account Change Business Process document for process AC 1.0 Change in Service Start/End Date and file the revised document with the Secretary for posting on Commission web site.
5. All affected parties are directed to be ready to begin Phase I testing on the 814 Account Change data standard

within 60 days of the date the test scenarios for this data standard are approved.

6. 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">• Technical Operating Profile for Electronic Data Interchange in New York, Supplement 1
SUPPLEMENT B	<ul style="list-style-type: none">• New York Electronic Data Interchange, Glossary of Terms
SUPPLEMENT C	<ul style="list-style-type: none">• New York EDI Transaction Standard for TS814 Change Request & Response• TS814 Change Data Dictionary• Change Business Process