

PHASE I TESTING RULES

General: As adopted by the New York State Public Service Commission¹ DPS Staff, in lieu of ESCO Phase I testing formerly conducted by Department of Public Service (DPS) Staff, utilities may perform ESCO Phase I testing as a prelude to Phase III testing as a part of the ESCO Application process.² The following options will be available to complete required Phase I testing:

- If the utility does perform a Phase I test, in such instances where, for example, an applicant ESCO is performing its own in-house EDI services, a fee to cover expenses formerly borne by DPS Staff is reasonable.
 - The utility's fee should be specified in its Utility Maintained EDI Guide.
 - In lieu of conducting Phase I, a utility may direct the applicant ESCO to contract for Phase I EDI Testing Certification from an Established EDI Service Provider.
 - A list of Established EDI Service Providers will be compiled from those currently serving ESCOs in New York and posted to the NY EDI website.

- If the applicant ESCO decides to contract for EDI Services with an Established EDI Service Provider and the utility is satisfied, based upon certification from the EDI Service Provider, that the applicant ESCO is Phase I capable, no utility Phase I test will be required.
 - When determining if the certification is satisfactory, the utility may take into consideration whether or not the Established EDI Service Provider is providing EDI services to other ESCOs in the utility's service territory.

- If an ESCO (applicant or active with the utility) wishes to transact EDI via an in-house system, it may request to test with the utility or contract for EDI Testing Certification from an Established EDI Service Provider.
 - If the utility is satisfied, based upon certification from the EDI Service Provider, that the new ESCO is Phase I capable, no utility Phase I test will be required.
 - When determining if the certification is satisfactory, the utility may take into consideration whether or not the Established EDI Service Provider is providing EDI services to other ESCOs in the utility's service territory.

- If an EDI Service Provider wishes to be added to the Established EDI Service Provider list, it may request to test with the utility or contract for EDI Testing Certification from an Established EDI Service Provider.
 - When determining if the new EDI Service Provider has satisfactorily established itself, the utility may take into consideration whether or not the new EDI Service Provider is testing with an Established EDI Service Provider or is providing EDI services to other ESCOs in the utility's service territory. Ideally, the new EDI Service Provider will be providing services to an ESCO.

Whether a Phase I test was performed by the utility or the utility determined the test was unnecessary for the ESCO, the utility would inform DPS Staff that the ESCO has met the Phase I testing requirement of UBP 2.B.2. Once an ESCO has successfully completed Phase I testing with one utility, it will have satisfied the Phase I testing requirement for all utilities and will be including in a list of Active Certified ESCOs/Direct Customers (with Phase I Certification) posted to the NY EDI website.

¹ Cases 12-M-0476, 98-M-1343, 06-M-0647 and 98-M-0667, Order Approving Modifications to the Electronic Data Interchange Standards (Issued and Effective December 7, 2015).

² The Phase I Testing Rules also apply to Direct Customers.