

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

CASE 12-M-0476 – Proceeding on Motion of the Commission to Assess Certain Aspects of the Residential and Small Non-residential Retail Energy Markets in New York State.

CASE 98-M-1343 – In the Matter of Retail Access Business Rules.

CASE 06-M-0647 – In the Matter of Energy Service Company Price Reporting Requirements.

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

REPORT ON EDI STANDARDS DEVELOPMENT

**I. Background**

On February 25, 2014, the Public Service Commission (“Commission”) issued Order Taking Actions To Improve The Residential And Small Nonresidential Retail Access Markets (“February 25 Order”) in the above referenced cases. To facilitate the implementation of the required Electronic Data Interchange (“EDI”) changes discussed in the Order, the Order required that 1) Department of Public Service Staff (“Staff”) convene a collaborative within thirty (30) days of the date of the Order and that 2) revised EDI standards should be filed for Commission consideration within 120 days of the date of the Order.<sup>1</sup> The collaborative was held on March 24, 2014. As a result of the collaborative, the New York Electronic Data Interchange Working Group (“EDI Working Group”) was formed. The Working Group consists of utility, Energy Services Companies (“ESCOs”) and EDI service provider representatives. Regularly scheduled meetings<sup>2</sup> by teleconference were initiated to develop revised EDI standards. On June 24, 2014, the EDI Working Group filed a Request for Extension and Initial Report on EDI Standards Development (“June 24 Report”). On July 1, 2014, consistent with the provisions of the February

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<sup>1</sup> February 25 Order, p. 45.

<sup>2</sup> Staff has provided and supports a web site on which meeting agendas, minutes and workpapers are available.

25 Order<sup>3</sup>, an extension was granted to and including October 23, 2014 for the EDI Working Group to file its Initial Report on EDI Standards Development (“July 1 Extension”). The instant filing is the Report required by the July 1 Extension, and provides mechanisms to provide all of the information required in the Commission’s February 25 Order. The proposed revisions to the EDI Standards discussed below, hereinafter, referred to as the Revised EDI Standards, are recommended by the EDI Working Group to be adopted as New York EDI Data Standards and Test Plans.

## **II. Specific Revisions to EDI Standards Required by the February 25 Order**

The February 25 Order requires that EDI standards be modified to allow utilities to provide ESCOs with additional information prior to and at the time of enrollment. These items, collectively referred to as “Non-usage Items”, are as follows:

1. a specific prospective customer’s Installed Capacity (ICAP) tag, which indicates the customer’s peak electricity demand ;
2. a customer’s number of meters and meter numbers;
3. whether the customer’s account is settled with the ISO utilizing an actual 'hourly' or a 'class shape' methodology;
4. whether the customer receives any special delivery or commodity “first through the meter” incentives or incentives from the New York Power Authority;
5. whether the utility identifies the customer as tax exempt;
6. the customer’s Standard Industrial Classification (SIC) code; and
7. whether the customer is currently served by the utility.

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<sup>3</sup> “The Secretary, in her sole discretion may extend the deadlines set forth in this order, provided the request for such extension is in writing, including a justification for the extension, and filed on a timely basis, which should be on at least one day's notice prior to any affected deadline.”, February 25 Order, p. 58.

The February 25 Order also directed that EDI standards be modified to accommodate the exchange of information necessary to implement actions directed in the Order, as well as information that may assist ESCOs in providing new and creative value-added products to mass market customers.<sup>4</sup> Furthermore, the Order requires that EDI standards be modified to allow the ESCO to notify the utility whether a customer is purchasing Energy Related Value Added Services (“ERVAS”) and the nature of that service.<sup>5</sup> As discussed in the REMS Letter, the EDI Working Group decided to defer ERVAS-related EDI development until a definition of ERVAS is developed and a better understanding of the information requirements surrounding ERVAS from Case 14-M-0101 - Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision becomes available.

With regard to low income matters, the February 25 Order directed that EDI standards be modified to provide a field for information on customer’s low income enrollment status.<sup>6</sup> On April 25, 2014, the Commission issued Order Granting Requests For Rehearing And Issuing A Stay which stayed the low-income/HEAP related provisions of the February 25 Order and effectively, the associated EDI development. Therefore, no revisions to the EDI Standards are being made with respect to a low-income indicator.

In addition, to assist ESCOs in overcoming any unknown barriers to enrolling a customer, the February 25 Order requires a utility to provide a reason code to the ESCO<sup>7</sup> when it rejects an EDI enrollment, e.g. indicating whether the customer has an “enrollment block” on his or her account. This requirement, met through a combination of modifications to the 867HU and 814HU Response transactions, is explained in the revised 814HU Business Process

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<sup>4</sup> February 25 Order, p. 45.

<sup>5</sup> Id. at p. 46.

<sup>6</sup> Id. at p. 25.

<sup>7</sup> Id., pp. 45-46.

Document.<sup>8</sup> The 867 HU transaction has been modified to provide Non-usage Items using a feature referred to as the PTD\*FG loop. Additionally, optional items Future ICAP Tag and Future ICAP Effective Dates were added to the 814E transaction.

The PTD\*FG loop will be sent even when there is no historical usage data available, (e.g., new accounts), however; no data will be sent, including the Non-usage Items, if there is a Customer Account Block in place or in the case of utilities that employ dual blocks, if a Historic Usage Block is in place.<sup>9</sup>

The Revised EDI Standards give the utility the option to provide the Non-usage Items to ESCOs in a non-EDI format as an alternative to implementing the PTD\*FG loop. Non-EDI availability of Non-usage Items has to be on effectively the same terms as EDI availability; i.e. non-implementation of the PTD\*FG loop does not absolve the utility of the requirement to provide Non-usage Items to the ESCO in response to a valid request. Similarly, even if an electric utility implements the PTD\*FG loop, it has the option to provide the NYPA Discount Indicator in a non-EDI format. The rationale for this optionality is that some utilities manually bill customers that participate in the ReCharge NY program so that no information is currently housed in the utility's billing system. In addition, some utilities expect the frequency of pre-enrollment requests for Non-usage Items to be low. Should this expectation prove to be incorrect, these utilities would likely move to the EDI implementation which is better suited to higher volume requests and responses.

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<sup>8</sup> Some utilities provide customers with the ability to place a single or comprehensive Customer Account Block that prevents changes in enrollment status and provision of account usage data to ESCOs. Other utilities employ a dual block system whereby the customer can block changes in enrollment status and/or provision of account usage data to ESCOs. The proposed modification applies primarily to utilities that employ a dual block system. Utilities that employ a Single Block effectively provide this information under the current EDI Standards.

<sup>9</sup> When a customer enables both blocks at a dual block utility, it is equivalent to a customer enabling a Customer Account Block at a single block utility. In either case, the Non-usage items will not be provided.

### III. Description of Revised EDI Standards Documents

As discussed in the June 24 Report, a full complement of Revised EDI Standards consisting of Implementation Guides, Testing Plans and Business Process documents was required to implement the changes envisioned in the February 25 Order. In addition to the modifications required by the February 25 Order, the Working Group also revised the EDI standards documents to remove references to specific utility implementations, modify/remove outdated language, address evolution of the internet Data Transfer Mechanism, and to otherwise reflect the mature state of existing utility and ESCO EDI implementations. Further, the Revised EDI Standards documents reflect changes to accommodate changes to utility systems<sup>10</sup> anticipated to occur over the next 12 months but not required by the February 25 Order.

There are eight attachments attached to this filing. The first seven are the Revised EDI Standards and the eighth attachment is informational. The attachments are as follows:

1. EDI Transaction 814C – Change (Account Maintenance);
2. EDI Transaction 814E – Enrollment Request & Response;
3. EDI Transaction 814HU – Consumption History Request & Response;
4. EDI Transaction 867HU – Consumption History/Gas Profile;
5. EDI Transaction 810SR – Invoice – Single Retailer Model;
6. EDI Glossary of Terms;
7. Technical Operating Profiles/Test Plans for EDI Transactions listed above, including:
  - a. Processing Architecture - Phase I & Connectivity Testing
  - b. Supplement 1 - Phase II and III Test Procedures

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<sup>10</sup> Unrelated to Case 12-M-0476, both National Fuel Gas Distribution Corporation and National Grid are implementing upgrades to business systems that, in part, impact their EDI Implementations. The EDI Working Group is including associated changes in the revised EDI standards documents to provide for operational consistency among EDI trading partners and to provide for efficiency in resulting EDI testing.

- c. Supplement 2 - 814 Change
  - d. Single Retailer - Supplement 7a – Cycle Invoice
  - e. Single Retailer - Supplement 7b – Calendar Invoice
  - f. Single Retailer - Supplement 7b – Summary Invoice
8. EDI Working Group interim progress report to the Retail Energy Marketers Stakeholder Forum email listserv on August 20, 2104 (“REMS Letter”).<sup>11</sup>

Each of the first five attachments, which represent the modifications to EDI Transactions, consists of clean<sup>12</sup> and redlined<sup>13</sup> versions of each EDI Transaction’s Implementation Guides, Data Dictionaries and Business Process<sup>14</sup> documents. The sixth attachment contains Clean and Redlined versions of the EDI Glossary of Term Implementation Guides used for New York’s EDI standards. The seventh attachment contains Technical Operating Profiles/Test Plans that support the transactions in the first five attachments.

#### **IV. Utility Maintained EDI Guides**

Consistent with the discussion in the REMS Letter, the EDI Working Group recommends that each utility develop and maintain its own guide to supplement the EDI Standards documents. Collectively, the EDI Standards and Utility Maintained EDI Guides would represent the most current implementation for each utility. The Revised EDI Standards documents have anticipated development of these guides and utility-specific notes in the current standards

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<sup>11</sup> The REMS Letter, which was provided an interim progress report, elaborates on the rationale behind development decisions made by the EDI Working Group and seeks feedback from recipients. None of the feedback received pertained to EDI development addressed in the Revised EDI Standards.

<sup>12</sup> To be clear, the Clean versions of the first seven attachments are the Revised EDI Standards.

<sup>13</sup> Each Redline document displays a comparison of the Clean version of the EDI standards document to the current version of the same EDI standards document.

<sup>14</sup> There is no Business Process document for the 867HU transaction, however, changes to the business process to request the 867HU transaction are addressed within changes to the 814HU Business Process document.

documents, to the extent still applicable, will be relocated to the Utility Maintained EDI Guides. Additionally, where the Revised EDI Standards documents indicate utility optionality, utilities would be expected to identify the options they've implemented. Since utilities would be encouraged to keep their test plans specific with their then-current implementations, this approach will help utilities and EDI Service Providers more efficiently test and implement the EDI Standards.

Utility Maintained EDI Guides will be made available on utility web sites. Additionally, the EDI Working group recommends that links to utility guides be made available on the Commission's EDI Standards web page.

Utilities will organize their documents in a manner that is complimentary to the EDI Standards documents. Utility Maintained EDI Guides will be made available in advance of testing of the Revised EDI Standards. Future modifications to guides should be provided sufficiently in advance<sup>15</sup> of the dates they become effective to provide ESCOs an opportunity to adjust their implementations and test, as necessary.

#### **V. Recommended Changes to Commission's EDI Web Pages**

The EDI Working Group plans to develop several recommendations to update, streamline and otherwise refresh the Commission's web pages related to EDI during the next few months. These recommendations will be provided to Staff who will ultimately determine if the recommendations are to be implemented. For example, the Working Group will recommend a

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<sup>15</sup> Except for changes to Utility Maintained Guides that clarify existing implementations, at least 30 days notice should be provided to ESCOs.

web archive for older versions of the EDI standards documents and removal of an outdated EDI Party List<sup>16</sup> from Case No. 98-M-0667.

## **VI. Recommended Implementation Date and EDI Testing Process**

The EDI Working Group recommends that the Commission accept a two phase implementation process for the Revised EDI Standards. Both utilities and ESCOs will need to make modifications to their business systems to accommodate processing of information contained in the Revised EDI standards; the EDI Working Group proposes that Utilities be given up to six months following issuance of an Order adopting the Revised EDI Standards to complete their system updates. Once the system updates are completed, utilities should begin testing with ESCO and/or EDI Service Providers. Testing should be completed within a two-month period.<sup>17</sup> If a utility completes its system updates prior to the end of the six-month period, the time should be added to the two-month testing period.

The EDI Working Group notes that with 240 ESCOs active within New York State, the coordination of testing dates with each of the utilities may be a daunting task. By initiating testing as soon as system updates are completed, those utilities are able to complete their updates prior to the six month deadline can help lessen the likelihood of testing scheduling conflicts for ESCOs and EDI Service Providers.<sup>18</sup>

The EDI Working Group also recommends that utilities be given discretion to streamline testing associated with the Revised EDI Standards. In some cases, adequate testing could be

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<sup>16</sup> The Commission's Document Matters Management system has a Party List feature that may be better suited for this purpose.

<sup>17</sup> If a Utility discovers problems with their implementation of the Revised EDI Standards during testing, it should inform Staff and seek an extension, if necessary.

<sup>18</sup> The EDI Working Group recognizes the ESCO system updates will proceed at an independent pace which may or may not align with each utility's system update completion date. Further, ESCOs may have to sequence testing with each utility so the proposed two-phase implementation should provide some flexibility to ESCOs and/or EDI Service providers too.

performed by an EDI Service Provider on behalf of groups of ESCOs for whom they provide EDI services.

In the coming months, the EDI Working Group plans to develop several recommendations to update, streamline and otherwise refresh the EDI testing procedures associated with the EDI Standards. These recommendations will be provided to Staff and may ultimately result in revised Technical Operating Profiles to be filed with the Commission.

## **VII. Summary**

The EDI Working Group recommends that the Commission accept this report and the recommendations contained herein. The EDI Working Group plans to continue its meeting schedule to address issues identified above and continue the process of updating and/or refreshing EDI Standards documents. Additionally, the EDI Working Group is available to address other EDI Development to the extent ordered by the Commission.

Respectfully submitted,

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REPORT ON EDI STANDARDS DEVELOPMENT

**I. Background**

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<sup>1</sup> February 25 Order, p. 45.

<sup>2</sup> Staff has provided and supports a web site on which meeting agendas, minutes and workpapers are available.

25 Order<sup>3</sup>, an extension was granted to and including October 23, 2014 ~~to~~for the EDI Working Group to file its Initial Report on EDI Standards Development (“July 1 Extension”). The instant filing is the ~~report~~Report required by the July 1 Extension, and provides mechanisms to provide all of the information required in the Commission’s February 25 Order. The proposed revisions to the EDI Standards discussed below, hereinafter, referred to as the Revised EDI Standards, are recommended by the EDI Working Group to be adopted as New York EDI Data Standards and Test Plans.

#### **I.II. Specific Revisions to EDI Standards Required by the February 25 Order**

The February 25 Order ~~also~~ requires that EDI standards be modified to allow utilities to provide ESCOs with ~~the following~~additional information prior to and at the time of enrollment. These items, collectively referred to as “Non-usage Items”, are as follows:

1. a specific prospective customer’s Installed Capacity (ICAP) tag, which indicates the customer’s peak electricity demand ;
2. a customer’s number of meters and meter numbers;
3. whether the customer’s account is settled with the ISO utilizing an actual 'hourly' or a 'class shape' methodology;
4. whether the customer receives any special delivery or commodity “first through the meter” incentives or incentives from the New York Power Authority;
5. whether the utility identifies the customer as tax exempt;
6. the customer’s Standard Industrial Classification (SIC) code; and
7. whether the customer is currently served by the utility.

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<sup>3</sup> “The Secretary, in her sole discretion may extend the deadlines set forth in this order, provided the request for such extension is in writing, including a justification for the extension, and filed on a timely basis, which should be on at least one day's notice prior to any affected deadline.”, February 25 Order, p. 58.

The February 25 Order also directed that EDI standards be modified to accommodate the exchange of information necessary to implement actions directed in the Order, as well as information that may assist ESCOs in providing new and creative value-added products to mass market customers.<sup>4</sup> Furthermore, the Order requires that EDI standards be modified to allow the ESCO to notify the utility whether a customer is purchasing Energy Related Value Added Services (“ERVAS”) and the nature of that service.<sup>5</sup> As discussed in the REMS Letter, the EDI Working Group decided to defer ERVAS-related EDI development until a definition of ERVAS is developed and a better understanding of the information requirements surrounding ERVAS from Case 14-M-0101 - Proceeding on Motion of the Commission in Regard to Reforming the Energy Vision becomes available.

With regard to low income matters, the February 25 Order directed that EDI standards be modified to provide a field for information on customer’s low income enrollment status.~~effectuate new requirements regarding customers who participate in utility low income assistance programs and/or Home Energy Assistance Program (“HEAP”) and states that utilities must be able to use EDI to provide ESCOs with the customer’s status as a participant in the utility low income assistance programs and/or HEAP.~~ On April 25, 2014, the Commission issued Order Granting Requests For Rehearing And Issuing A Stay which stayed the low-income/HEAP related provisions of the February 25 Order and effectively, the associated EDI development. Therefore, no revisions to the EDI Standards are being made with respect to a low-income indicator.

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<sup>4</sup> February 25 Order, p. 45.

<sup>5</sup> Id. at p. 46.

<sup>6</sup> Id. at p. 25.

In addition, to assist ESCOs in overcoming any unknown barriers to enrolling a customer, the February 25 Order requires a utility to provide a reason code to the ESCO<sup>7</sup> when it rejects an EDI enrollment, e.g. indicating whether the customer has an “enrollment block” on his or her account. This requirement, met through a combination of modifications to the 867HU and 814HU Response transactions, is explained in the revised 814HU Business Process Document.<sup>8</sup>

~~Within the 867 HU transaction has been modified to provide Non-usage Items using the EDI Working Group designed a feature to contain additional information, as required by the February 25 Order. This feature, more properly referred to as the PTD\*FG loop, contains segments for the following items: Customer Supply Status, Industrial Classification Code, Utility Tax Exempt Status, Block on Account, Account Settlement Indicator, NYPA Discount Indicator, Utility Discount Indicator, Enrollment Block, ICAP Tag, ICAP Effective Dates, Number of Meters and Meter Number. Collectively, these items are referred to as “non-usage” items. Additionally, optional items Future ICAP Tag and Future ICAP Effective Dates were added to the 814E transaction.~~

The PTD\*FG loop will be sent even when there is no historical usage data available, (ie.eg., new accounts), however; no data will be sent, including the ~~non~~Non-usage items~~Items~~, if there is a Customer Account Block<sup>9</sup> in place or in the case of utilities that employ dual blocks, if a Historic Usage Block is in place.<sup>10</sup>

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<sup>7</sup> Id., pp. 45-46.

<sup>8</sup> Some utilities provide customers with the ability to place a single or comprehensive Customer Account Block that prevents changes in enrollment status and provision of account usage data to ESCOs. Other utilities employ a dual block system whereby the customer can block changes in enrollment status and/or provision of account usage data to ESCOs. The proposed modification applies primarily to utilities that employ a dual block system. Utilities that employ a Single Block effectively provide this information under the current EDI Standards.

<sup>9</sup> ~~Some utilities provide customers with the ability to place a single or comprehensive Customer Account Block that prevents changes in enrollment status and provision of account usage data to ESCOs. Other utilities employ a dual block system whereby the customer can block changes in enrollment status and/or provision of account usage data to~~

The ~~proposed~~ Revised EDI Standards give the utility ~~with~~ the option to provide the ~~non~~ Non-usage ~~items~~ Items to ESCOs in a non-EDI format as an alternative to implementing the PTD\*FG loop, ~~but availability~~ Non-EDI availability of ~~non~~ Non-usage ~~information~~ Items ~~pre-enrollment~~ has to be on effectively the same terms as EDI availability; i.e. non-implementation of the PTD\*FG loop does not absolve the utility of the requirement to provide ~~non~~ Non-usage ~~items~~ Items to the ESCO in response to a valid request. Similarly, even if an electric utility implements the PTD\*FG loop, it has the option to provide the NYPA Discount Indicator in a non-EDI format. The rationale for this optionality is that some utilities manually bill customers that participate in the ReCharge NY program so that no information is currently housed in the utility's billing system. In addition, some utilities expect the frequency of pre-enrollment requests for ~~non~~ Non-usage ~~information~~ Items to be low. Should this expectation prove to be incorrect, these utilities would likely move to the EDI implementation which is better suited to higher volume requests and responses.

### III. **Description of Revised EDI Standards Documents**

As discussed in the June 24 Report, a full complement of ~~revised~~ Revised EDI ~~standards~~ Standards consisting of Implementation Guides, Testing Plans and Business Process documents was required to implement the changes envisioned in the February 25 Order ~~documents is necessary for implementation~~. In addition to the ~~development~~ modifications required by the February 25 Order, the Working Group also revised the EDI standards documents to remove references to specific utility implementations, modify/remove outdated language, address evolution of the internet Data Transfer Mechanism, and to otherwise reflect the mature state of

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~~ESCOs. Enabling both blocks at a dual block utility is equivalent to a enabling a Customer Account Block at a single block utility.~~

<sup>10</sup> When a customer enables both blocks at a dual block utility, it is equivalent to a customer enabling a Customer Account Block at a single block utility. In either case, the Non-usage items will not be provided.

existing utility and ESCO EDI implementations. Further, the ~~R~~revised EDI ~~standards~~Standards documents reflect changes, ~~within the current standards,~~ to accommodate changes to utility systems<sup>11</sup> ~~implementations~~ anticipated to occur over the next 12 months but not required by the February 25 Order.

~~There are eight attachments proposed revisions to the EDI standards are~~ attached to this filing. ~~The first seven are the Revised EDI Standards and the eighth attachment is informational.~~

The attachments are as follows:

1. EDI Transaction 814C – Change (Account Maintenance);
2. EDI Transaction 814E – Enrollment Request & Response;
3. EDI Transaction 814HU – Consumption History Request & Response;
4. EDI Transaction 867HU – Consumption History/Gas Profile;
5. EDI Transaction 810SR – Invoice – Single Retailer Model;
6. EDI Glossary of Terms;
7. Technical Operating Profiles/Test Plans for EDI Transactions listed above, including:
  - a. Processing Architecture - Phase I & Connectivity Testing
  - b. Supplement 1 - Phase II and III Test Procedures
  - c. Supplement 2 - 814 Change
  - d. Single Retailer - Supplement 7a – Cycle Invoice
  - e. Single Retailer - Supplement 7b – Calendar Invoice
  - f. Single Retailer - Supplement 7b – Summary Invoice

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<sup>11</sup> ~~Unrelated to Case 12-M-0476, Both both~~ National Fuel Gas Distribution Corporation and National Grid are implementing upgrades to business systems that, in part, impact their EDI Implementations. The EDI Working Group is including associated changes in the revised EDI standards documents to provide for operational consistency among EDI trading partners and to provide for efficiency in resulting EDI testing.

8. EDI Working Group interim progress report to the Retail Energy Marketers Stakeholder Forum email listserv on August 20, 2104 (“REMS Letter”).<sup>12</sup>

The first five attachments are organized by EDI transaction:

814C	Change (Account Maintenance)
814E	Enrollment Request & Response
814HU	Consumption History Request & Response
867HU	Consumption History/Gas Profile
810SR	Invoice—Single Retailer Model

Each of the first five attachments, which represent the modifications to EDI Transactions, consists of Clean<sup>13</sup> and Redlined<sup>14</sup> versions of each EDI Transaction’s Implementation Guides, Data Dictionaries and Business Process<sup>15</sup> documents. ~~There is no Business Process document for the 867HU transaction because the processes for that transaction are addressed with the 814HU Business Process document. The 810SR attachment includes also Clean and Redline versions of Remittance Procedures.~~ The sixth attachment contains Clean and Redlined versions of the EDI Glossary of Term Implementation Guides used for New York’s EDI standards. The seventh attachment contains Technical Operating Profiles/Test Plans that support the transactions in the first five attachments:

~~Processing Architecture—Phase I & Connectivity Testing~~

~~Supplement 1—Phase II and III Test Procedures~~

~~Supplement 2—814 Change~~

<sup>12</sup> The REMS Letter, which was provided an interim progress report, elaborates on the rationale behind development decisions made by the EDI Working Group and seeks feedback from recipients. None of the feedback received pertained to EDI development addressed in the Revised EDI Standards.

<sup>13</sup> To be clear, the Clean versions of the ~~above documents in the~~ first seven attachments are the ~~items the EDI Working Groups recommends to be adopted as New York EDI Data Standards and Test Plans.~~ Collectively, these changes are referred to as the “Revised EDI Standards”.

<sup>14</sup> Each Redline document displays a comparison of the Clean version of the EDI standards document to the current version of the same EDI standards document.

<sup>15</sup> There is no Business Process document for the 867HU transaction, however, changes to the business process to request the 867HU transaction are addressed within changes to the 814HU Business Process document.

~~Single Retailer—Supplement 7a—Cycle Invoice~~

~~Single Retailer—Supplement 7b—Calendar Invoice~~

~~Single Retailer—Supplement 7b—Summary Invoice~~

~~An informal interim progress report of the EDI Working Group circulated to the Retail Energy Marketers Stakeholder Forum email listserv on August 20, 2014 (“REMS Letter”) is the eighth attachment. The REMS Letter elaborates on the rationale behind development decisions made by the EDI Working Group and seeks feedback from recipients. None of the feedback received pertained to EDI development addressed in the Revised EDI Standards.~~

### ~~III. Development of EDI Standards Revisions Development by the Working Group~~

#### IV. Utility Maintained EDI Guides

Consistent with the discussion in the REMS Letter, the EDI Working Group recommends that each utility develop and maintain its own guide to supplement the EDI Standards documents. Collectively, the EDI Standards and Utility Maintained EDI Guides would represent the most current implementation for each utility. The ~~revised~~ Revised EDI ~~standards~~ Standards documents have anticipated development of these guides; ~~and~~ utility-specific notes in the current standards documents, to the extent still applicable, ~~would~~ will be relocated to the Utility Maintained EDI Guides. Additionally, where the Revised EDI Standards documents indicate utility optionality, utilities would be expected to identify the options they’ve implemented. Since utilities would be encouraged to keep their test plans specific with their then-current implementations, ~~it is believed that~~ this approach will help utilities and EDI Service ~~providers~~ Providers more efficiently test and implement the EDI Standards.

Utility Maintained EDI Guides ~~should~~will be made available on utility web sites. Additionally, the EDI Working group recommends that links to utility guides be made available on the Commission's EDI Standards web page.

Utilities ~~should~~will organize their documents in a manner that is complimentary to the EDI Standards documents. Utility Maintained EDI Guides ~~should~~will be made available in advance of testing of the Revised EDI Standards. Future modifications to guides should be provided sufficiently in advance<sup>16</sup> of the dates they become effective to provide ESCOs an opportunity to adjust their implementations and test, as necessary.

#### **V. Recommended Changes to Commission's EDI Web Pages**

The EDI Working Group plans to develop several recommendations to update, streamline and otherwise refresh the Commission's web pages related to EDI during the next few months. These recommendations will be provided to Staff who will ultimately determine if the recommendations are to be implemented. For example, the Working Group will recommend a web archive for older versions of the EDI standards documents and removal of an outdated EDI Party List<sup>17</sup> from Case No. 98-M-0667.~~the refined the requirement to indicate the customer's current supplier status of either utility or ESCO.~~

#### **VI. Recommended Implementation Date and EDI Testing Process**

The EDI Working Group recommends that the Commission accept a two phase implementation process for the Revised EDI Standards. Both utilities and ESCOs will need to make modifications to their business systems to accommodate processing of information contained in the Revised EDI standards; the EDI Working Group proposes that Utilities be given

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<sup>16</sup> Except for changes to Utility Maintained Guides that clarify existing implementations, at least 30 days notice should be provided to ESCOs.

<sup>17</sup> The Commission's Document Matters Management system has a Party List feature that may be better suited for this purpose.

~~up to an implementation date of six months following issuance of an Order adopting the Revised EDI Standards to complete their system updates. Once the system updates are completed, utilities should begin testing with ESCO and/or EDI Service Providers. Testing should be completed within a two-month period.<sup>18</sup> If a utility completes its system updates prior to the end of the six-month period, the time should be added to the two-month testing period. In addition to the time necessary to modify both utility and ESCO business systems to accommodate processing of information contained in the revised EDI standards, testing between EDI trading partners will be necessary.~~

The EDI Working Group notes that with 240 ESCOs active within New York State, the coordination of testing dates with each of the utilities may be a daunting task. By initiating testing as soon as system updates are completed, those utilities are able to complete their updates prior to the six month deadline can help lessen the likelihood of testing scheduling conflicts for ESCOs and EDI Service Providers.<sup>19</sup>

The EDI Working Group also recommends that utilities be given discretion to streamline testing associated with the Revised EDI Standards. In some cases, adequate testing could be performed by an EDI Service Provider on behalf of groups of ESCOs for whom they provide EDI services.

In the coming months, the EDI Working Group plans to develop several recommendations to update, streamline and otherwise refresh the EDI testing procedures

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<sup>18</sup> If a Utility discovers problems with their implementation of the Revised EDI Standards during testing, it should inform Staff and seek an extension, if necessary.

<sup>19</sup> The EDI Working Group recognizes the ESCO system updates will proceed at an independent pace which may or may not align with each utility's system update completion date. Further, ESCOs may have to sequence testing with each utility so the proposed two-phase implementation should provide some flexibility to ESCOs and/or EDI Service providers too.

associated with the EDI Standards. These recommendations will be provided to Staff and may ultimately result in revised Technical Operating Profiles to be filed with the Commission.

## VII. Summary

The EDI Working Group recommends that the Commission accept this report ~~as well~~ ~~as and~~ the recommendations contained herein. The EDI Working Group plans to continue its meeting schedule to address issues identified above and continue the process of updating and/or refreshing EDI ~~standards~~ Standards documents. Additionally, the EDI Working Group ~~stands~~ ~~by is available~~ to address other EDI Development to the extent ordered by the Commission.

Respectfully submitted,

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