

April 2, 1998

Thomas B. Getz, Esq.,  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
8 Old Suncook Road  
Concord, NH 03301

Re: Electric Utility Industry Restructuring, Docket DR 96-150  
EDI Working Group Report

Dear Mr. Getz:

In order to facilitate the efficient and reliable transfer of data between regulated distribution companies and non-regulated providers of competitive services, the Commission in its Plan authorized the establishment of an Electronic Data Interchange (EDI) Working Group (the "Working Group"). The Working Group's task was to develop a consensual plan for the transmission of electronic information among distribution companies and competitive suppliers.

The Working Group is pleased to report that it has accomplished its primary goal of developing standard transactions and formats for the electronic transfer of customer information. The enclosed report details the consensus reached by the Working Group following many extensive meetings involving each New Hampshire utility and several competitive suppliers (a list of participating entities is included in the report). Some of the issues where the Working Group did not reach consensus are summarized below and also highlighted in the report.

With appropriate planning, the Working Group believes these standard transactions and formats can be substantially implemented by July 1, 1998. The need to begin preparations is immediate as systems must be installed and tested prior to any transmittals. Additionally, the Working Group has developed a training protocol for competitive suppliers which will be administered by the distribution companies. In order to meet the timelines specified in the report, the Working Group respectfully requests that the Commission approve the proposal promptly, allowing the longest possible lead time for this preparatory work to be completed.

It is expected that the final version of these transactions and formats will govern all electronic business transactions between competitive suppliers and distribution companies. However, the detailed operational issues addressed in the proposal are subject to rapid change, especially during the early stages of retail choice. Accordingly, the Working Group recommends that it continue to work on implementation issues and modify the consensual plan as the need arises. Any proposed modifications to the standard transactions and formats described in the report would be subject to the approval of the Working Group and the Commission.

As mentioned above, the Working Group seeks the Commission's guidance on the following issues on which the Working Group did not reach consensus:

- (1) The Working Group recommends that all distribution companies maintain an Internet site, for access by trading partners, containing various standard documents (e.g., tariffs, class average load shapes, loss adjustment factors, and scheduled meter-read dates). CVEC believes that this requirement should be optional rather than mandatory, allowing for alternative methods for conveying that information;
- (2) Unitil and PSNH are concerned that the recommendation that cash be transferred daily under the Consolidated Billing Service option could place an unreasonable administrative burden on distribution companies. They suggest that distribution companies be given the flexibility to arrange mutually agreeable cash transfer schedules;
- (3) The Working Group could not agree on whether interval usage data in the possession of distribution companies should be provided to authorized competitive suppliers free of charge;
- (4) CVEC and NHEC do not concur that complete development, implementation and testing of transactions can be attained by May 7, 1998 (the date that distribution companies must be ready to test with competitive suppliers). In addition, all distribution companies believe that a period of less than one month will be insufficient to work with all interested competitive suppliers to complete the testing and discrepancy resolution process necessary for the suppliers to receive registration from the Commission and begin customer enrollment.

The Working Group also requests further direction from the Commission on several issues described below, which were addressed in other Working Group proposals, that are inconsistent with certain business rules contained in this report:

- (1) **Appropriate Authorization for Customer Enrollment**  
The Working Group believes appropriate authorization includes a written or electronic transmission to competitive suppliers or an oral authorization provided to a qualified and independent third party verifier. The Supplier Registration Working Group only allows written authorization;
- (2) **Mandatory Attendance of Supplier Training Session**  
The Working Group requires all competitive suppliers to attend an EDI training session before any electronic transmittals occur. The Supplier Registration Working Group believes that attendance at training sessions should be optional;
- (3) **Termination of Service by Competitive Supplier**  
When terminating a customer's service, the Working Group requires competitive

suppliers to provide a minimum of two-days notice to distribution companies for the termination to become effective on the customer's next meter read date. A written notice from the competitive supplier to the customer is not required. The Supplier Registration Working Group requires competitive suppliers to provide a seven-day notice to distribution companies which becomes effective on the later of the next meter read date or that specified on the notice to the customer; and

(4) Termination of Business in NH by Competitive Supplier

The Supplier Registration Working Group requires competitive suppliers to send an electronic notice to distribution companies and also a written notice to customers. The notice required is the later of thirty days or the start of next billing cycle. The EDI Working Group believes this requirement will be impossible to enforce.

The Working Group supports the Supplier Registration Working Group's proposal to impose penalties to any party committing the infractions identified below:

- (1) Failure to obtain appropriate enrollment authorization for release of customer load information;
- (2) Release of customer data without customer authorization; and
- (3) Supplier refusal/failure to issue drop transaction to distribution company following a customer's request to do so.

The Working Group respectfully requests that the Commission adopt the report in its entirety and direct each distribution company to implement its requirements. The Working Group also requests that the Commission provide further guidance on the above-described contested issues.

Sincerely,

Director of Restructuring  
New Hampshire Public Utilities Commission