

Decision 99-07-007 July 8, 1999

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**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Proposed Policies Governing Restructuring California's Electric Services Industry and Reforming Regulation.

Rulemaking 94-04-031  
(Filed April 20, 1994)

Order Instituting Investigation on the Commission's Proposed Policies Governing Restructuring California's Electric Services Industry and Reforming Regulation.

Investigation 94-04-032  
(Filed April 20, 1994)

**OPINION REGARDING THE PROPOSED IMPLEMENTATION FOR ELECTRONIC DATA INTERCHANGE PROTOCOLS FOR METER USAGE DATA**

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**Summary**

In Decision (D.) 98-12-080, the Commission adopted the recommendation that electronic data interchange (EDI) protocols be used for transferring meter usage data information. The Commission established September 1, 1999, as the date to implement EDI protocols on a trial basis, with the goal of having EDI as the only standard no later than February 1, 2000. The proposed EDI protocols and implementation guidelines were developed by the parties and submitted to the Commission for approval. Today's decision approves the proposed EDI protocols with the understanding that the parties will attempt to resolve the issues that Enron has raised in its comments.

**Background**

In D.98-12-080, the Commission adopted the recommendation of the Permanent Standards Working Group (PSWG) that meter usage data be

transferred using EDI protocols. The PSWG recommended that there be a migration to the EDI protocols following the adoption of an implementation plan developed by the market participants. The Commission directed the Energy Division to work with the Direct Access Tariff Review Committee (DATRC) to develop the proposed implementation plan for EDI.

In response to the PSWG recommendation, the DATRC formed the Meter Usage Data Task Group (MUDTG) to develop the plan. The MUDTG conducted a series of meetings to document the business model for communicating meter usage data, and to define the EDI transactions which implement the business model. In compliance with Ordering Paragraph 6 of D.98-12-080, the DATRC filed its "Proposed Statewide Implementation Guide For Electronic Data Interchange Protocols To Transfer Meter Usage Information" (Report) on April 2, 1999.

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Enron and the Office of Ratepayer Advocates (ORA) filed their comments to the Report on April 23, 1999.

The draft decision of the assigned Administrative Law Judge was mailed to the parties in accordance with Pub. Util. Code § 311(g) and Rule 77.1 of the Commission's Rules of Practice and Procedure.

Opening comments to the draft decision were filed by ORA, and joint opening comments were filed by Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company. Reply comments were filed by Enron.

### **The Report**

The Report documents the planning processes behind the use of EDI protocols, to be used instead of the existing California Meter Exchange Protocol (CMEP), to transfer meter usage information. The Report describes the requirements necessary to transfer settlement quality meter usage data using EDI

protocols. The general requirements for implementing the EDI protocols are described in Sections 4 through 6 of the Report. The transfer of meter usage data uses the protocols set forth in the EDI transaction set 867, which is described in Section 5 of the Report and in Attachment C of the Report.

### Positions of the Parties

ORA endorses the Report in its entirety, and recommends that it be adopted by the Commission. ORA points out that all of the proposed data structures are in compliance with the implementation guidelines that the Utility Industry Group (UIG) have been advocating at the national level.<sup>1</sup>

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ORA also recommends that the Commission encourage further development of EDI for other kinds of meter transactions. ORA recognizes that the development of EDI protocols for other kinds of meter transactions takes time, and that the Commission and other market participants should establish priorities for deciding what kinds of transactions should utilize EDI protocols.

Enron's filing contains some general comments, as well as specific comments, about the Report. The specific comments of Enron have been inserted at the appropriate places in the Attachment to Enron's filing, as have the general comments. The Attachment to Enron's comments consists of a copy of the Report with Enron's annotations.

Enron's general comments fall into five categories. The first category is whether the Report is assuming that Internet "push" technology or interactive website technology will be utilized as the standard. Enron states that in portions

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<sup>1</sup> ORA states that the UIG is a utility industry action group that represents members on the American National Standards Institute's (ANSI) X12 protocols committee. The UIG develops, promotes, and establishes conventions for the use of EDI protocols, guidelines, and tools in the utility industry.

of the Report, it includes elements which are inconsistent with push technology. It is Enron's understanding that this issue is to be developed in the Internet EDI working group. Although Enron favors the push technology, the Report should clarify that a decision has not yet been made as to whether push or interactive website technology will be used.

The second category concerns the two options for identifying valid packages of consumption interval detail records. Enron contends that the first option is to include a summary record for each set of intervals that includes the period start and end date times. The summary record provides the control totals which help ensure the integrity of the incoming data by serving as a validation that the receiving party successfully processed all intervals included in the transmission by the sender. In addition, the summary record provides dates to package the intervals into meaningful billing/meter read periods. Enron contends that the dates and times are needed to provide accurate data validation to ensure that there are no data gaps or overlaps. Enron points out that the Report does not require that summary records accompany the detailed interval consumption data.

Enron states that in the absence of a summary record, the second option is that all parties must agree on a common definition for start and stop times based on account billing period calendars. Enron contends that if this option is used, it is necessary to apply a period, such as "midnight to midnight" across the board. The Report, however, does not require that a specific period be established.

Enron asserts that the Report does not comply with either of the options for identifying valid packages of consumption interval detail records. Enron therefore recommends that the Report be modified to either include summary record information or the use of a specific period such as midnight to midnight.

Enron's third category of comments relates to corrected data. Enron points out that if errors occur in receiving or loading "original" consumption data, the destination system may have difficulties in discerning between the original data and "corrected" data.

The fourth category addresses "cancel" records. Enron states that the transaction model in the Report does not include cancel records. The Report states:

"Cancellations of previously transmitted data will not be sent, since data are required to be available within specified timeframes and since the data may already have been acted upon by the recipient once it has been posted. The data should simply be corrected if in error." (Report, Attachment A, Resending/Adjustment, Par. 6.)

Enron believes that the above discussion needs to be clarified for the following reasons. First, Enron states that the data used for settlements with the Independent System Operator can be corrected up to 57 days after the consumption date. If data is mistakenly applied to an incorrect account, such a change could impact the settlement calculation. Second, if the receiver assumes that the most recently received data for an account overwrites any previously received consumption data, and the data is applied to an incorrect account, the receiver could inadvertently overwrite correct data with incorrect data. Third, if data is sent for an account that should not have any consumption for that billing period, the utility must correct that account to zero for the entire billing period. The cancel record would advise the receiver of this. And fourth, since the reason for sharing consumption data is to bill the customer, Enron states that corrected or canceled consumption should be sent at any time regardless of whether the originally posted consumption has been used for billing or settlements. Providing such information will maintain an accurate record.

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Enron also points out that if the billing cycle on an account is incorrect for a period of time, the ESP may need to reframe the intervals to correspond to the correct bill cycle after the data has been posted.<sup>2</sup> In order to reframe the data, a cancel record is needed to avoid any billing period overlap errors.

The fifth category of comments pertains to system integration issues. Enron states that certain parts of the Report appear to assume that an EDI format will be developed that is compatible with the CMEP protocol that is currently in use. Enron points out that many of the data elements and data processing/capture requirements for EDI are more complex than those used to support the CMEP. Enron states that if the majority of market participants cannot technically meet the new rules, it is not clear from the Report whether exceptions will be available to them or whether the protocols will be optional. Enron states that these points need to be clarified before substantial modifications to existing internal systems are undertaken.

In the opening comments to the draft decision, ORA and the utilities oppose the draft decision's recommendation that the MUDTG review Enron's comments to determine whether there should be any changes to the EDI protocols. ORA and the utilities state that the MUDTG meetings were well publicized, but that Enron only attended one or two meetings. They also assert that Enron's comments were considered by the MUDTG and addressed in the Report. The utilities also expressed the concern that any substantive changes to the EDI protocols will result in a delay of the EDI implementation date.

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<sup>2</sup> Reframe refers to a change in the time frame of the metered usage data that is posted to the MDMA server. It usually refers to a change to the beginning or ending date and time of the usage data.

Enron states it raised its issues either in person or by telephone, or through written comments, at the MUDTG meetings. Enron also states that it is prepared to proceed with the standards that the Commission adopts, and that the review of Enron's concerns will not jeopardize the implementation date for the EDI protocols.

### **Discussion**

We have reviewed the Report and comments of ORA and Enron. Enron's annotated Report and its comments on the Report have some merit. Its comments affect some of the EDI protocols, and the manner in which certain words or terminology may be interpreted. However, it is unclear from the Report and Enron's comments whether the issues that Enron raised were brought up during the meetings of the MUDTG, or whether this is the first time Enron's comments have been raised.

Our general reaction to Enron's comments is that they tend to clarify the intent of the Report by making it more precise. For example, Enron points out that in parts of the Report it is unclear whether a push technology or an interactive technology will be used to transfer meter usage information. Although Enron mentions that the Internet EDI group is looking into what type of technology should be used, the Report does not mention this group at all. Enron cites other examples that need clarification such as the following: which external parties should have access to the MDMA server; what is expected of all parties on September 1, 1999 and on February 1, 2000; that the Report should refer to EDI as a data format rather than a communication system; and that the references to natural gas should be deleted from the Report.

Enron also points out some difficulties that it has with the Report with respect to ensuring that all data be identified as to a specific period of time, and how data which has been corrected or re-verified should be communicated.

Enron has made other general and specific comments that we do not address here, but are issues which impact the EDI protocols.

No one requested an opportunity to respond to Enron's comments to the Report, nor did any other party raise the same kind of issues. Although ORA and the utilities point out in their comments to the draft decision that the Report already addresses Enron's concerns, it is not readily apparent from a review of the Report whether all of Enron's concerns were fully addressed in the Report. That is why we prefer to have the MUDTG review the issues that Enron has raised, and to report on its efforts to the Commission.<sup>3</sup>

In order to timely implement EDI as the standard format for transmitting meter usage data, it is important that we forge ahead with the timetable originally established in D.98-12-080. Enron's comments and annotations to the proposed EDI protocols are not extensive and do not appear to be insurmountable obstacles. Instead of trying to resolve these issues now, we prefer to give the MUDTG the opportunity to see if Enron's concerns can be addressed before the EDI protocols are implemented on a permanent basis.

At this time, we will adopt the proposed EDI protocols as set forth in the Report, with the understanding that the MUDTG will review Enron's comments to determine whether changes need to be made to the protocols. The MUDTG shall file and serve a report on the status of the attempt to resolve Enron's comments within 45 days of the effective date of this decision. The report shall contain a statement of the issues, whether the issues have been resolved, and if

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<sup>3</sup> We have some reservations about the manner in which Enron raised its concerns. If Enron decided not to actively participate in the development of the EDI implementation plan, then that is something the Commission should consider when it decides whether further changes to the EDI protocols are needed.



so, in what manner and its effect on the EDI protocols. If the issues have not been resolved, the report shall contain a summary of the various parties' positions on the issues. Interested parties will then have 20 days from the date of service of the report to file comments on the report. A decision will then follow. Such a procedure will allow us to move forward with the EDI protocols on a trial basis, while affording interested parties an opportunity to resolve any outstanding EDI issues.

ORA recommends in its comments that the Commission encourage the further development of EDI for other transactions, including meter-specific information flows. Since the purpose of the Report focused only on the EDI protocols for meter usage data, this decision should confine itself to the contents of that Report. Although we encourage all parties to develop a common understanding for the use of EDI protocols in other kinds of transactions, the Report lacks specific information on what other EDI activities are being pursued.

### **Findings of Fact**

1. In D.98-12-080, the Commission adopted the recommendation that there be a migration toward using EDI protocols to transfer meter usage data.
2. The DATRC formed the MUDTG for the purpose of developing plans for transferring meter usage data using EDI.
3. The Report filed by the DATRC on April 2, documents the planning processes behind the use of EDI protocols, and the requirements necessary to transfer meter usage data using EDI protocols.
4. Enron's comments affect some of the EDI protocols, and the way in which certain words or terminology may be interpreted.
5. It is unclear whether Enron's comments were raised during the meetings of the MUDTG.

6. The Report focused on the EDI protocols for meter usage data, and did not provide specific information about what other EDI activities were being pursued.

### **Conclusion of Law**

The Commission should adopt the proposed EDI protocols as set forth in the Report, with the understanding that the MUDTG should review Enron's comments to determine whether changes need to be made to the EDI protocols.

## **O R D E R**

**IT IS ORDERED** that the electronic data interchange (EDI) protocols that are set forth in the "Proposed Statewide Implementation Guide For Electronic Data Interchange Standards To Transfer Meter Usage Information" are adopted pending possible revision as set forth below.

- a. The Meter Usage Data Task Group (MUDTG) shall review Enron's comments to determine whether the changes it suggests should be incorporated in the EDI protocols.
  - (1) The MUDTG shall file and serve a report in the prescribed format on the status of the attempt to resolve the issues that Enron has raised within 45 days from the effective date of this decision.
  - (2) Interested parties may file and serve comments to the MUDTG report within 20 days from the date the report is served.

- b. The adopted EDI protocols shall be implemented on a trial basis beginning September 1, 1999, and shall be used for all meter usage data transfers starting no later than February 1, 2000, unless otherwise specified by the Commission.

This order is effective today.

Dated July 8, 1999, at San Francisco, California.

RICHARD A. BILAS  
President  
HENRY M. DUQUE  
JOSIAH L. NEEPER  
JOEL Z. HYATT  
Commissioners

I abstain.

/s/ CARL W. WOOD  
Commissioner