

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

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

NOVEMBER 2018 REPORT ON EDI STANDARDS DEVELOPMENT

Periodically, updates to New York's Electronic Data Interchange ("EDI") Standards Documents, consisting of Implementation Guides, Testing Plans and Business Process documents (collectively, "EDI Standards Documents" or "EDI Standards") developed by the New York Electronic Data Interchange Working Group ("EDI Working Group") are reported<sup>1</sup> to the Commission. The last EDI report was submitted in April 2018.<sup>2</sup>

The instant filing ("November 2018 Report") includes modifications addressing limited cyber security concerns pertaining to the Electronic Delivery Mechanism ("EDM") used to transport EDI transactions via the public internet, Department of Public Service ("DPS") Staff requested changes to the Phase I testing application, standardization of gray box notes to provide clarity and consistency in the 814C and 814HU Implementation Guides and incorporation of updates addressing April 2018 Report errata.

The most substantive changes are to the Technical Operating Profile Standards to upgrade<sup>3</sup> New York's standard EDM from GISB EDM 1.4 to GISB EDM 1.6 matching the EDM standard employed by most other states that utilize EDI transactions to support customer choice/retail access programs, i.e. to implement what the relevant industry considers to be the

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<sup>1</sup> The reporting procedure is addressed in Case Nos. 12-M-0476, 98-M-1343, 06-M-0647 and 98-M-0667, July 2015 Report on EDI Standards Development (Filed July 24, 2015), pp. 5-7 and Order Approving Modifications to the Electronic Data Interchange Standards (Issued and Effective December 7, 2015), pp. 5-6.

<sup>2</sup> Case 98-M-1343, April 2018 Report on EDI Standards Development (submitted April 30, 2018) ("April 2018 Report").

<sup>3</sup> The purpose of upgrading from New York's current use of the Gas Industry Standards Board (GISB) 1.4 standard is to ensure that "Confidential Utility Information is encrypted in transit utilizing industry best practice encryption methods," as stated on the Self-Attestations provided by Energy Service Entities to utilities.

best practice. In addition to this change, the November 2018 Report revises the Technical Operating Profile Standards to:

- Require a 1024-bit PGP encryption key.
- Recommend the practice of utilizing different PGP keys for production and test environments.
- Recommend that periodic testing associated with utility-initiated changes to PGP keys be process in batches.
- Update references to the underlying EDM standards documents supported by the North American Energy Standards Board (“NAESB”).<sup>4</sup>
- Update the recommendations for alternative secure medium recommendations to be used during prolonged EDI outages to reflect technological changes.
- Reflect other changes to reflect experience since New York’s initial implementation of the EDI and to address miscellaneous errata.

The EDI Working Group discussed additional upgrades but chose instead to defer decisions in deference to anticipated recommendations of a soon to be established New York Cyber Security Working Group.<sup>5</sup> Specifically, the following items are deferred:

- Further updates New York’s standard EDM, i.e. mandated implementation of a higher version than GISB EDM 1.6.
- Whether or not to require and/or support longer PGP encryption keys, e.g. 2048-bit or 4096-bit.
- Further recommendations for alternative secure medium recommendations to be used during prolonged EDI outages to reflect technological changes.

## **I. Description of EDI Standards Documents**

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<sup>4</sup> The New York EDI Standards reference, but do not include, NAESB standards and other work products (available at <http://www.naesb.org>), including the GISB EDM. NAESB’s standards and other work products are copyrighted and protected by federal copyright law.

<sup>5</sup> Case 18-M-0376, Proceeding on Motion of the Commission Regarding Cyber Security Protocols and Protections in the Energy Market Place, *Department Of Public Service Staff Report on the Status of the Business-To-Business Collaborative to Address Cyber Security in the Retail Access Industry* (submitted September 24, 2018) – “At the technical conferences held on July 26 and 27, 2018, the parties discussed instituting a “cyber security working group” for the purpose of continuing to nimbly refine cyber security requirements as threats and technology change. This model would be similar to the electronic data interchange (EDI) working group that meets periodically to discuss issues surrounding the exchange of data between utilities and ESCOs and adopts modifications to the EDI process. Staff supports this initiative as a potentially effective means of evaluating and adapting the existing DSA and Self-Attestation to an everchanging cyber landscape going forward.”, pp.6-7.

The modified EDI standards, attached to this filing, are organized by EDI transaction:

Attachment	Transaction	Description	IG	DD	BP
1	TOPs	Technical Operating Profile and TOP Supplement 8	N/A		
2	814C	Change (Account Maintenance) Transaction	x		
3	814HU	Consumption History Request & Response Transaction	x		

Each attachment consists of Clean<sup>6</sup> and Redlined<sup>7</sup> versions of EDI Standards Documents if changes were made to the existing document (designated with an ‘x’ in the table above).

## II. Expedited EDI Standards Approval

The EDI Standards documents referenced in the instant filing are being submitted under the Expedited EDI Standards Approval Process (“Expedited Process”).<sup>8</sup> The EDI Working Group does not recommend or request further Commission action. The Expedited Process includes redress provisions for parties that disagree with the recommendations in this filing.

## III. Proposed Implementation Timeframe Recommendations

The EDI Working Group recommends a 12-month implementation timeline for changes identified in the Technical Operating Profile; principally the EDM upgrade and PGP bit-length requirement. Implementation of these items require testing and a shortened timeline would likely result in overlapping testing for ESCOs and consequent conflicts among utility testing timelines. While it is recommended that utilities upgrade to GISB EDM 1.6 sooner than later,

<sup>6</sup> The Clean versions of the above documents are the items the EDI Working Group adopts as replacements for the current versions of documents in the New York EDI Data Standards and Test Plans.

<sup>7</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>8</sup> “The Expedited EDI Standards Approval Process will apply to EDI transactions for which the EDI Working Group has reached consensus, including modifications associated with mature business practices, non-mandatory EDI modifications, retirement of unused EDI transaction components, and/or corrections of errors.”, December 2015 Order, p. 7.

based upon varying utility resource availability, it is possible that some utilities may not fully upgrade until the end of 2019.

Otherwise, no specific implementation timeline is recommended but for those changes to the EDI Standards proposed in the November 2018 Report that primarily concern existing business practices, optional business practices or corrections to reflect current EDI implementations, they should be implemented by utilities in the normal course of business. With the exception of minor changes and/or “bug fixes”, when implementing changes (including optional items) utilities should provide at least 30 days’ notice to ESCOs utilizing EDI in the utility’s service territory (and their EDI Service Providers). This notification will give ESCOs lead time to implement changes to (and test, if necessary) their systems.

#### **IV. Summary**

The EDI Working Group plans to continue its meeting schedule and respond to the issues brought forth by industry participants, Department of Public Service Staff and the Commission.

Respectfully submitted,



Michael E. Novak  
Assistant General Manager  
National Fuel Gas Distribution Corporation  
6363 Main St.  
Williamsville, NY 14221 -5887  
[NovakM@natfuel.com](mailto:NovakM@natfuel.com)

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