



January 6, 2016

VIA ELECTRONIC FILING

Honorable Kathleen H. Burgess
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Re: 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.

Dear Secretary Burgess:

The enclosed addenda, issued by New York State Electric & Gas Corporation and Rochester Gas and Electric Corporation (together the "Companies") are transmitted for filing in compliance with the requirements of the New York Public Service Commission's (the "Commission") Order Approving Modifications to the Electronic Data Interchange Standards, issued and effective on December 7, 2015 (the "Order"), in the above referenced proceedings. The addenda will become effective on January 7, 2016.

P.S.C. No. 120 – Electric, Schedule for Electric Service
Addendum UBP – Uniform Business Practices, No. 10

P.S.C. No. 88 – Gas, Schedule for Gas Service
Addendum UBP – Uniform Business Practices, No. 10

P.S.C. No. 19 – Electric, Schedule for Electric Service
Addendum UBP – Uniform Business Practices, No. 9

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P.S.C. No. 16 – Gas, Schedule for Gas Service
Addendum UBP – Uniform Business Practices, No. 10

Purpose of the Filing

The Companies are filing revised addenda in compliance with Ordering Clause No. 2 of the Order. Changes proposed to the Electronic Data Interchange (EDI) Standards by the EDI Working Group's (Working Group) in its report filed on July 24, 2015, require updates to the Uniform Business Practices (UBP).

Overview of Filing

The Commission had directed the Working Group to consider ways to streamline the EDI development, implementation and testing process. The Working Group proposed an Expedited EDI Standards Approval Process which requires ESCOs to submit the name of the utility that will conduct Phase I testing, rather than the name of the Department of Public Service (DPS) Test Moderator. This would require updating UBP Section 2.B.2. The revisions to revise Section 2.C allows the named utility, instead of DPS, to verify that the Phase I testing requirement has been met.

Publication

The Companies request waiver of publication of these proposed changes in accordance with Section 66(12)(b) of the Public Service Law and 16 NYCRR Section 720-8.1, as these revisions have no direct impact on the Companies' customers.

If there are any questions concerning this filing, please call Kathy Grande at (585)771-4514 or me at (607)762-8710.

Yours Sincerely,



Lori A. Cole
Manager – Regulatory & Tariffs
Rates and Regulatory Economics Department

Enclosures