ESCO News

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August 27, 2024

Retail Access System Replacement – Q3 Stakeholder Input Meeting
Wednesday, August 28, 2024 from 10:00 AM to 11:00 AM

Please attend the Q3 Stakeholder Input Meeting on **August 28 from 10:00 AM – 11:00 AM EST**. The purpose of this meeting is to gather input on the Company's business plan for the Retail Access System Replacement Project. The drafted business plan is attached below for your review prior to the meeting.

Agenda

- Retail Access System Replacement Overview
- Business Plan Overview
- Focus on Testing
- Business Plan Feedback
- Next Steps
- Q&A

Thank you,

Retail Access System Replacement Team
Consolidated Edison Company of New York, Inc.
www.coned.com

Contact Us
If you have any questions or comments, please visit our ESCO website or email RetailAccess@coned.com.

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Calls may only be recorded for business purposes, upon notice to meeting participants.

RETAIL ACCESS SYSTEM REPLACEMENT

BUSINESS PLAN

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

SEPTEMBER 2024

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EXECUTIVE SUMMARY

Consolidated Edison Company of New York, Inc. ("Con Edison" or "CECONY") and Orange and Rockland Utilities ("O&R"), collectively "the Company", embarked on the pre-implementation planning phase of its Retail Access System Replacement ("RASR") effort in 2024 to replace its aging legacy retail access systems. A retail access system provides the technological capability for delivering high-quality service to customers and market providers ("Stakeholders") to enable customers to choose their electricity and natural gas supplier from a competitive market, known as retail choice. Recognizing that energy choice remains an important option for consumers within the Con Edison and O&R service territory, the Company is committed to meeting New York State's retail choice mandates and enabling customers who select an energy provider that promotes renewable, as well as traditional, energy supply. The Company's long-range plans continue to emphasize customer expectations amid dynamic changes in technology and the marketplace. Overlaying this shift in customer expectations are New York's energy policy initiatives, which include the pursuit of achieving 70 percent of its electricity from renewable energy sources by 2030 and a zero-emission electric grid by 2040, known as the New York Clean Energy Standard.[1]

The RASR effort is focused on several key requirements. First, understanding the requirements of Stakeholders such as Energy Service Companies ("ESCOs"), requires defining the strengths and challenges of the Company's current systems. Additionally, it is essential to identify design requirements that satisfy the needs of key Stakeholders and enable Con Edison to meet regulatory demands. Analysis and selection of a leading technology solution to meet these requirements are equally important. Lastly, incorporating a comprehensive analysis into a formal business plan—including key activities to design, build, and deploy the selected retail choice technology, develop an implementation plan, and identify projected costs and benefits—is foundational to the RASR effort.

The PSC's July 2023 *Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans with Additional Requirements* ("2023 Rate Order") directed the Company to

[1] "Clean Energy Standard". New York State Energy Research and Development Authority, 2024, https://www.nyserda.ny.gov/All-Programs/Clean-Energy-Standard

file a business plan with the PSC and "engage and consider Stakeholder feedback related to its replacement of its Retail Access Information System and draft business plan" as part of the Company's replacement program.[2] The Company has implemented a comprehensive engagement strategy with Stakeholders, including quarterly Stakeholder meetings, which serve as a platform for updating Stakeholders on project developments and fostering dialogue. The Company also holds small forum focus groups with select Stakeholders to gather feedback and gain a deeper understanding of their technological needs. To complement these efforts, the Company has conducted two surveys to gather Stakeholder input on its proposed retail access technology plans and feedback on its business plan outline. The Company has reviewed this input and integrated it, where possible, into its overall program strategy. Stakeholder engagement has enabled the Company to develop a robust list of requirements for its future state retail access technology and select a platform that will address many of the Stakeholders' key needs in working with the Company.

The Company conducted a thorough evaluation of its current retail access systems to determine the capabilities of its retail access platforms and opportunities for improvements in features and functionality. A combination of complex business rules and requirements, growth in volume of transactions, and aging technology, have caused current state retail access transactions to fail while also making it more difficult for Company information technology personnel to identify the points of failure. The complexities of these legacy custom-built systems often significantly extend the time required for failure recovery and issue resolution, leading to process and operational inefficiencies.

The Company's comprehensive analysis of potential replacements for its legacy systems has found limited commercial-off-the-shelf ("COTS") applications suitable for the retail choice market. The Company recommends implementing an integrated COTS application that seamlessly integrates with its Oracle Customer Care & Billing ("CC&B") platform, and has robust market integration capabilities, automatic error correction features, and efficient real-time and batch processing capabilities. The integrated application will further provide an

[2] Cases 22-E-0064 and 22-G-0065 - Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans with Additional Requirements, p. 52.

enhanced experience for Stakeholders in their interactions with the Company, details highlighted in Table 1 below.

Implementation Plan and Proposed Schedule

The Company expects to complete the proposed implementation by the third quarter of 2027, based on the decision to proceed with an integrated application. The Company has defined a 33-month timeline that incorporates six phases: (1) define the vision and scope of the formal program, (2) develop an integrated project plan and stand up key governance processes, (3) review the key design decision developed during the pre-implementation planning effort and define detailed functional and technical requirements, (4) configure the application to meet the functional and technical specifications, (5) test the configured application and integrations, and (6) deploy and stabilize the application and track Key Performance Indicators.

A significant component of this timeline, more than 15 months, is devoted to testing. The Company has elected to incorporate extensive testing internally and with ESCOs, EDI providers, and other impacted Stakeholders to confirm the readiness of the system for use and mitigate post-production complications. This testing approach is based on extensive lessons learned from past large technology programs, including the recent Oracle CC&B implementation, as well as benchmarking conducted with peer utilities who have undergone similar efforts. The benchmarking revealed that extensive pre-deployment testing was a key component in the success of these implementations. As such, the Company will engage in a robust set of testing activities during the implementation of its integrated application, described in detail in the Test Plan and Scope section of this document.

Cost Benefit Summary

The Company developed a formal business case to evaluate the financial and functional justifications for replacing its legacy Retail Access system with a modern, enterprise system. The Company estimates <insert figure here> in capital expenses, including Allowance for Funds Used During Construction ("AFUDC") through 2027, to plan, analyze, design, build, test, and deploy this new system. The Company also estimates <insert figure here> of operation

and maintenance expenses ("O&M") to implement and stabilize the new platform through 2027 (Table 1). These costs reflect a cost allocation of approximately 92.75 percent / 7.25 percent between Con Edison and O&R.[3]

In its analysis, the Company identified potential savings that it may realize once the new system is operational. These savings are detailed in the discussion of financial and non-financial benefits in the "Cost Benefit Summary" section of this Business Plan. In summary, the major benefits of the new Retail Access system include:

Table 1: Financial and Non-Financial Benefits Summary

Financial Benefits	**Non-Financial Benefits**
• Decommission legacy Retail Access system(s) • Enable labor efficiencies	• Enhance data quality • Improve operational efficiency • Enable process improvements • Introduce automation testing • Expand labor pool

In conclusion, the retail choice marketplace continues to evolve to afford customers with more options to participate in a diverse array of clean and traditional energy choices. And to support this environment, the Company requires a modern Retail Access system to facilitate the delivery of efficient solutions and address increasing customer and Stakeholder needs and expectations.

[3] See Consolidated Edison Corporate Accounting Procedure, Accounting for Transactions between CECONY and ORU, GAP-040C, April 28, 2017

RETAIL ACCESS SYSTEM REPLACEMENT BACKGROUND

NYS Policy Evolution for the Competitive Energy Marketplace

New York State ("NYS" or the "State") introduced full retail competition in the State's electric and natural gas markets in the late 1990s. The introduction of competition granted utility customers the opportunity to choose their energy supplier. The NYS Public Service Commission ("PSC") directed Con Edison to file tariff leaves and a Retail Access Implementation Plan and Operating Procedure to implement the Company's Retail Access program ("Retail Choice").[4] The first phase of Con Edison's Retail Choice program ran from June 1, 1998 through March 31, 1999, and included proposals for a program to encourage participation by residential and small commercial, non-time-of-use electric customers. This first phase was successful in encouraging the participation of approximately 60,000 retail customers in Retail Choice.[5] Subsequently, the Commission ordered the Company to file yearly proposals with the PSC to further support the NYS Retail Choice program. In response to its proposal, Con Edison received PSC approval in April 2002 to implement a consolidated billing program and electronic data interchange ("EDI") standards.[6]

The PSC adopted Uniform Business Practices ("UBPs") in February 1999 to provide consistent business procedures for both ESCOs and electric and gas utilities across the state. As the competitive retail energy market has evolved, the UBPs have been amended to reflect changes in the market while continuing to provide consumer protections, streamlined business transactions, and communications protocols between ESCOs and utilities.[7]

[4] Cases 96-E-0897 and 97-E-1641, Filed Session of June 24, 1999, To put into effect on a permanent basis, Consolidated Edison Company of New York, Inc.'s tariff amendments related to Retail Access Phase II (C. 96-E-0897) and Power for Jobs Program (C. 97-E-1641) filed in compliance with Commission Orders issued November 25, 1998 and February 5, 1999, p. 1-2.
[5] Case 96-E-0897, In the Matter of Consolidated Edison Company of New York, Inc.'s plans for (1) Electric Rate/Restructuring pursuant to Opinion No. 96- 12; and (2) the formation of a Holding Company pursuant to Public Service Law, Sections 70, 108 and 10, and certain related transactions. Order Approving Incentives for Retail Access Phase II, pp. 2-3.
[6] Case 96-E-0897 – Order Approving Phase 5 Retail Choice Program, p. 1-2.
[7] "Uniform Business Practices". New York State Department of Public Service, n.d., https://dps.ny.gov/uniform-business-practices.

The Company has consistently supported the requirements of the Retail Access program for all Stakeholders through the adoption of the UBPs. This includes the following:

- Replacement of email communications and transactions to and from Stakeholders with standardized EDI transactions
- Community Choice Aggregation
- Service Portability enhancements
- Implementation of an EDI Testing Tool to help support the onboarding of new ESCOs to the market
- Management and support of interval usage data with the implementation of Smart Meter/Advanced Metering Infrastructure ("AMI") technologies
- Support of ESCO credit and debit EDI transactions on customer accounts
- Monthly and Historical Interval Usage enhancements
- Development and enhancement of custom internal user interfaces for Company employees to effectively navigate the system, data, and business requirements

Energy choice remains a crucial option for consumers, particularly within the Con Edison service territory. It also contributes in the State's pursuit of achieving 70 percent of its electricity from renewable energy sources by 2030 and a zero-emission electric grid by 2040, known as the New York Clean Energy Standard.[8] The Company is committed to facilitating customer choice and collaborating with ESCOs and other Stakeholders in a seamless and market-friendly manner, while working with customers, regulators, policymakers, and other Stakeholders in reimagining energy for the future.[9] As part of this commitment, the Company is endeavoring to enhance its retail access capabilities and enable customers who wish to select an energy provider that promotes renewable energy supply.

[8] "Clean Energy Standard". New York State Energy Research and Development Authority, 2024, https://www.nyserda.ny.gov/All-Programs/Clean-Energy-Standard

[9] "*Our Clean Energy Commitment*". Con Edison, 2016-2024, https://www.coned.com/en/our-energy-future/our-energy-vision/our-energy-future-commitment

Market and Transaction Growth

The NYS Retail Access Program, established to enhance competition in energy markets after deregulation, has seen significant growth. The Company has supported and participated in the Retail Access Program through engagements with the growing number of ESCOs and customers who elect to enroll in the program. Since the inception of the program in the late 1990s, the Retail Access market in the Company's service territory has grown to more than 650,000 electric and gas customers and more than 200 ESCOs.

The Company processes more than 17 million ESCO-related transactions annually, with the Company's adoption of EDI standards and technology for the transmission of customer information and related data. As the volume of transactions increased, the Company implemented technology platforms to facilitate data exchanges with the ESCOs. These platforms also integrate ESCO choice seamlessly into customer billing processes. The robust technology architecture supporting ESCO involvement and customer energy choice is central to the Company's Retail Access Program and compliance with the PSC's regulatory requirements. Furthermore, employee training emphasizes effective customer engagement to support inquiries or customer concerns regarding Retail Access.

The Company has continued to experience a steady growth of EDI transaction volumes related to account changes, price changes, and monthly and historical usage requests. The Retail Access program's rules and requirements, reflected in the UBPs and numerous PSC orders in multiple proceedings, have evolved throughout the years. Additional policies and regulatory requirements such as distributed energy resource management mandates and community distributed generation, have further complicated the retail access landscape. This growth and market changes have introduced challenges, particularly when paired with the Company's current technology platforms.

Current Retail Access System Overview and Challenges

The Company has developed and leveraged a suite of customized Retail Access applications to support the NYS Retail Access EDI framework established in 2001. These tools, developed

more than two decades ago to facilitate the management and processing of market transactions involving ESCOs, EDI providers, and other Stakeholders, are reaching the end of their useful life. Consequently, these aging systems, crucial for supporting customer choice and ESCO participation, are now outdated and unable to effectively adapt to market changes.

The combination of complex business rules and requirements, growth in volume of transactions, and aging technology can cause Retail Access transactions to fail, while making it more difficult for information technology personnel to identify the points of failure. These complexities often significantly extend the time required for failure recovery and issue resolution. The Company encounters issues in the reconciliation of incoming and outgoing transactions between divergent systems, which lead to inefficient collaboration with Stakeholders. Due to outdated application integration technologies, a single erroneous record in a file of multiple records can interrupt the processing and generate a system error which impacts all records from processing successfully. Additionally, there are technological limitations that restrict the processing of files above a specific size. The Company has made a concerted effort over the years to enhance its processes, modify the applications, and implement monitoring and alerts for when transactions fail to process. There are limitations in what can be achieved because the technologies used to build these applications are obsolete and as such, do not effectively integrate with modern platforms. These limitations present challenges for the Company to process growing transaction volumes, implement system enhancements and maintain updates to the Retail Access programs.

To comply with the UBPs and PSC orders and respond timely to ESCOs, the Company needs to replace its existing Retail Access System. As described in the PSC's 2023 Rate Order, the Company will "engage and consider Stakeholder feedback related to its replacement of its Retail Access Information System and draft business plan" as part of its replacement program.[10] This program will replace outdated legacy applications and improve operational efficiencies.

[10] Cases 22-E-0064 and 22-G-0065 - Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans with Additional Requirements, p. 52.

The RASR program will focus on simplifying system interactions, reducing the number of system interfaces and potential points of failure, and eliminating the need for maintaining discrepancy reports. Such streamlining would not only enhance efficiency and system reliability, but also enable robust logic validation and proactive data issue alerts.

Pre-Implementation Planning Effort

The Company implemented a modern enterprise customer care and billing platform for both Con Edison and O&R in October 2023. This initiative has provided the Company with a valuable opportunity to modernize, consolidate, and streamline its Retail Access applications. Accordingly, the Company received PSC approval in the 2023 Rate Order to initiate the RASR project. The Joint Proposal adopted in the 2023 Rate Order requires the Company to develop a formal business plan and engage Stakeholder engagement to gather input on the Company's draft business plan, testing and implementation milestones, and test plan and communication protocols.[11] The Company initiated its pre-implementation planning effort in Q1 2024.

Con Edison and O&R engaged consultants to help evaluate the operational capability and functionality of its legacy Retail Access systems; document the key business requirements to support Retail Access, including the UBPs; propose system solutions and alternatives, technologies, and solution architecture; and develop the business case analysis found in later sections of this Business Plan.

The focus of the Pre-Implementation Planning effort was to establish the business case and set a strong foundation for the RASR Project. The Company adopted a pre-implementation planning approach that included establishing project governance, developing a Stakeholder engagement plan, completing a fit-gap analysis on functional and technical requirements, finalizing an implementation roadmap, and completing and filing the formal business plan. The Company followed prescribed milestones throughout this planning effort to engage and gather input from key Stakeholder parties, as established in the 2023 Rate Order. The following section details this undertaking.

[11] Cases 22-E-0064 and 22-G-0065 - Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans with Additional Requirements, p. 118.

Stakeholder Outreach Sessions and Results

The 2023 Rate Order directed that the Company engage with ESCOs and other Stakeholders in the first quarter of 2024 to gather feedback and input on the program. Following that initial engagement, the Rate Order required the Company to engage in further outreach in the second quarter of 2024 on its Business Plan. Specific engagement efforts have included and continue to include:

- Quarterly Stakeholder update sessions, which focus on updates on the pre-implementation planning effort and provide an open forum for questions.
- Small forum Stakeholder conversations with smaller groups of Stakeholders who manage a high volume of retail access transactions.
- Survey to Stakeholders requesting feedback on current systems and functionality, their goals for a replacement solution, to assist the Company in understanding their priorities, current challenges, and desired outcomes. The Company collated these results and shared them with Stakeholders during a follow-up meeting. Key results are featured below:

Figure 1: Stakeholder Survey Results Executive Summary

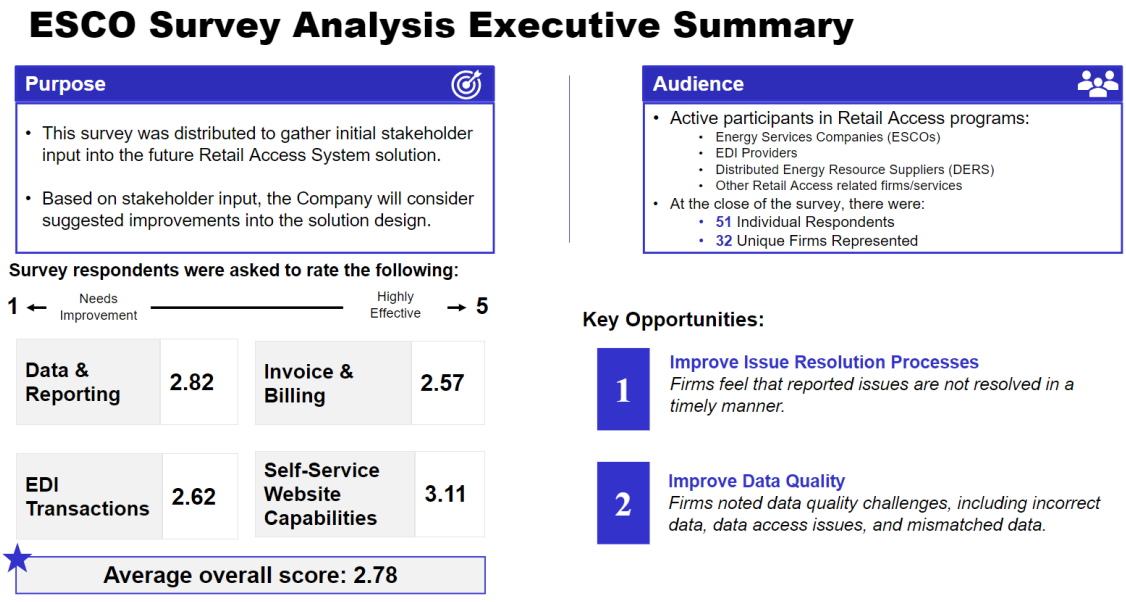
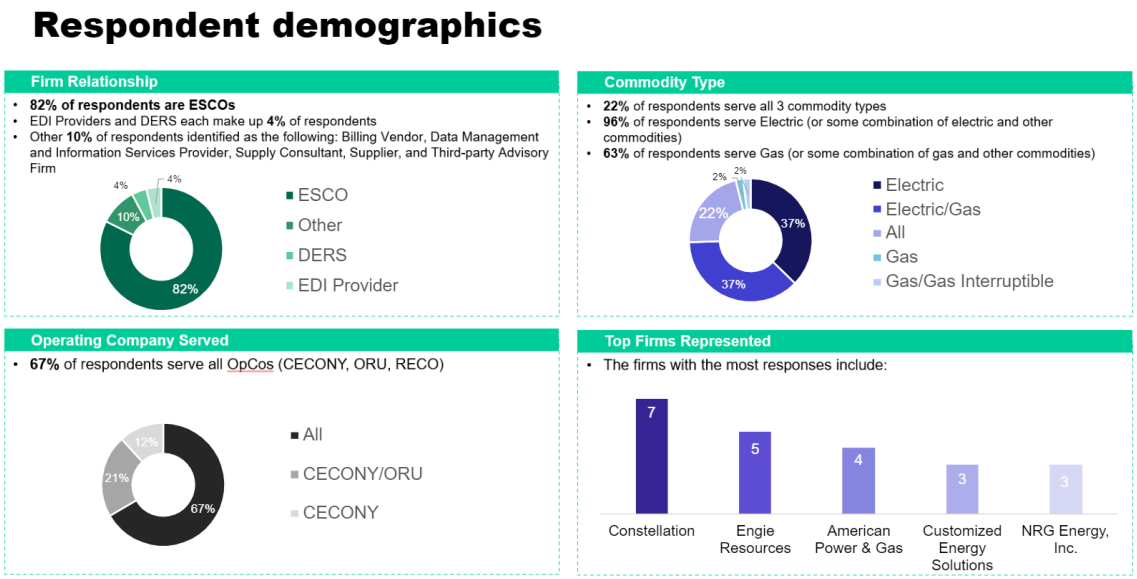


Figure 2: Stakeholder Survey Results Respondent Demographics



- ESCO Newsletters provide project updates and meeting materials for reference. These are in addition to the existing resources the Company provides to ESCOs.
- Survey on the initial outline of this Business Plan to request feedback from Stakeholders on content focus areas and support development of a business plan that would address Stakeholder needs and PSC requirements. This Business Plan integrates Stakeholder feedback provided in this survey.
- Survey on a draft of this Business Plan to request Stakeholder feedback, which will be integrated throughout the filed version.

FURTHER CONTENT TO BE DEVELOPED POST AUGUST BUSINESS PLAN SURVEY

Company and Stakeholder Roles and Responsibilities

The Company is deeply committed to fostering a competitive retail energy market in which all customers can select their energy supplier. Furthermore, the Company actively supports the needs of participating ESCOs and Stakeholders by adhering to the UBPs' standards for efficient business transaction processing, effective communication protocols, and the security of customer data and transactions.

The Company's dedicated Retail Choice department actively collaborates with the PSC and engages with ESCOs and Stakeholders to meet customer needs and support efficient ESCO operations. Additionally, this group works with Stakeholders through formal annual, bi-annual, and quarterly meetings to provide relevant updates on the retail access market, system issues and resolutions, and other ongoing/proposed IT-related changes.

As the Company embarks on the RASR program, it will continue pursuing engagement and transparency through quarterly engagement meetings through the implementation of the new retail access platform, as well as by involving Stakeholders in integration testing and User Acceptance Testing ("UAT"). The Company will continue to leverage written communications (e.g., newsletters) and standing meetings (e.g., Annual Marketer Meeting), as necessary, provide instruction and guidance for Stakeholders on the new solution so that they understand what is changing for them and to prepare them for the new platform's features and functions.

ESCO and Stakeholder roles and responsibilities include active and ongoing engagement with the Company's Retail Access operations and robust participation in the RASR project. The Company will coordinate critical testing activities and invites the participation of Stakeholders who transact Retail Access data with the Company. Key efforts during the test phase of the project will include system integration testing and UAT to validate data and confirm alignment with Stakeholders' day-to-day operations. Further information on testing efforts can be found in the "Test Plan and Scope" section.

Future Retail Access System Solution Overview

The Company has proactively researched technological and market advancements to develop a future state Retail Access system solution that aligns with business and Stakeholder requirements, while adhering to regulatory and UBP standards. Key system requirements of the future state solution include:

- A single technology platform that provides Retail Access infrastructure and integrations to ESCOs and third-party Stakeholders, as well as to existing Company technology architecture and platforms, including Oracle CC&B;

- Improved exception handling to allow for better reliability and faster root cause analysis of errors and system issues;
- Enhanced compliance with computer security, audit requirements, and logging capabilities;
- Improved operational efficiencies through a streamlined transaction management process and reduction of manual processes; and
- Automated and secure capabilities for bi-directional communication with Stakeholders, such as ESCOs, to empower customer choice and customer engagement.

The Company utilizes a custom-built set of legacy applications that interface with Oracle CC&B and other corporate systems. In its pre-implementation planning effort, the Company conducted an analysis of an integrated application and alternatives to evaluate whether their capabilities will address the current challenges and future needs of the NY Retail Access market. The Company conducted this analysis to validate the robustness and scalability of the proposed technologies and platforms, and assess whether they can meet the evolving demands of the market. The effort focused on gathering information about the operational use and capabilities of the potential solutions, which allowed the Company to map out future needs against available replacement alternatives.

While the Company recommends moving forward with the integrated solution detailed in this Business Plan, should that not be deemed workable, two alternative solutions were assessed for consideration. These solutions include 1) enhancing the current billing system to manage retail access functionality and upgrading its current data exchange system, and 2) extending the life of the legacy retail access systems through product enhancements and upgrades.

The Company recommends advancing with the RASR initiative using an integrated application that encompasses seamless integration with Oracle CC&B, robust market integration capabilities, automatic error correction features, and facilitates efficient real-time and batch processing capabilities. The integrated application would utilize the same Oracle Utilities Application (OUA) framework as Oracle CC&B, which promotes its compatibility with the customer account management and billing system. The Company will conduct a working

technical implementation and final evaluation of an integrated application, specifically implemented and evaluated on the Company's current version of Oracle CC&B, as part of its project delivery and implementation plan, by the end of Q2 2025.

PROJECT DELIVERY PROCESS, IMPLEMENTATION PLAN, AND PROPOSED SCHEDULE

Benchmark Summary

The Company has gathered best practices and valuable lessons learned from within the Company, third-party vendors ("Vendors"), and peer utilities to inform its approach to implementing a new retail access solution. Key takeaways from the Company's recent CSS implementation emphasize the importance of minimizing open items and conducting post-functional workshops. Additionally, it is critical to thoroughly examine existing defects within current retail access systems and integrated systems to understand their root cause and projected mitigation timelines, and to incorporate ample contingency, particularly for testing phases and ESCO engagement. A notable observation from the Company's CSS implementation is to facilitate opportunities to collaborate across project teams to maximize information sharing and promote an integrated solution. The RASR effort has incorporated this lesson during the pre-planning phase, structuring the project to facilitate integration across workstreams from the outset, and recognizing the importance of all key individuals in project activities, e.g., testing, having a comprehensive understanding of the project. This reflective exercise has equipped the Company with key insights, positioning it to navigate the complexities of adopting and tailoring a retail access solution that aligns with its operational needs and objectives.

The Company also contacted selected utility peers to understand their solutions and associated benefits and challenges. This proactive engagement with external utility counterparts has yielded an understanding of the potential advantages and obstacles associated with various retail access solutions, thereby facilitating informed decision-making in compliance with industry standards and regulatory expectations.

Lessons learned are detailed below:

- **Gather Comprehensive Functional Requirements**: Clear market and business requirements for each transaction and process within the utility retail access system are essential. These requirements must be communicated in terms that business users can comprehend, as they are foundational to the development of the solution and the creation of test scenarios that verify the solution meets both business and market demands.

- **Conduct Requirements Reviews**: There are two critical stages for conducting requirements reviews. The first stage involves pre-design requirement reviews, where the solution team collaborates with Company business owners to review the captured requirements, confirm understanding, gather configuration values, discuss assumptions, define scope, and obtain document sign-off. The second stage is the design requirements review, during which the solution team presents the requirements to its vendor partner design, development, and testing teams to enable an understanding of the project's broader scope. Requirements reviews conducted pre- and post-design enable checks and balances throughout the system development lifecycle, which are critical to achieving a functional end solution.

- **Facilitate a Functional Demonstration**: A functional demonstration of the solution with Company Stakeholders before code delivery is beneficial for both business users and functional subject matter experts ("SMEs"). This offers a preview of the solution, facilitating discussions about assumptions and confirming that the project team can address discrepancies in understanding. As a result, when the transactions and/or processes are delivered, the business is already acquainted with the solution, minimizing risk and the need for a potential redesign.

- **Use Converted Data and Transaction Files**: Using actual scenarios of customer transactions in early testing phases significantly enhances the quality of market transaction tests. By testing with transactions that have been processed by Oracle CC&B, the team can avoid the pitfalls of assumptions that are inherent in manually

created transactions. This approach effectively initiates parallel testing early in the project lifecycle, enabling an additional layer of validation throughout the testing phases.

- **Execute Automated Testing**: At the project's outset, creating automated test scripts and expanding the suite of automated tests throughout the project allows for repeated test runs prior to each delivery. This practice improves the overall quality of the solution, reduces the number of defects delivered, and identifies potential issues without the need for extensive manual regression testing after each defect resolution.

- **Execute Performance Testing**: When planning performance testing, it is important to account for atypical events such as double billing due to holidays or other occurrences. Although the performance during such one-off events may not align with standard timelines, the solution must still be robust enough to handle these exceptional cases. Planning sufficient time to execute a robust performance testing effort is a critical layer of testing validation that will equip the RASR project for success.

Table 2: Benchmark Utilities

Utility	Region	Utility Type	Single/Multiple Jurisdiction	Customers	Billing Platform
Utility 1	East	Gas	Single	Over 1 million	Oracle C2M
Utility 2	East	Gas	Multiple	Over half a million	Oracle CCS
Utility 3	Midwest	Electric	Single	Over 3 million	Oracle CC&B
Utility 4	Midwest	Electric	Single	Over 100 thousand	Oracle CCS
Utility 5	Northeast & West	Electric	Multiple	Over 3 million	Oracle C2M

Overview of Delivery Process and Implementation Plan

Project Delivery Approach and Proposed Schedule

The Company's approach to project delivery relies on an integrated and comprehensive project plan that encompasses all activities necessary for the solution delivery process. This process includes enterprise architecture, process design, configuration, development, and testing, including a series of technical test processes and ESCO/Stakeholder testing. It also leverages organizational change management, knowledge transfer, training, integration, data conversion,

dress rehearsal preparations, business readiness, go/no-go evaluation dates and activities, cutover, and post go-live ("Stabilize") support.

The project delivery approach considers the production of measurable deliverables during the design phase and utilizes a staggered waterfall model for configuration and development activities. The delivery approach considers the existing enterprise architecture landscape with over a dozen ancillary Edge systems and related system integrations; the complexity of the New York State retail access program with approximately 200 ESCOs and Stakeholders; the integration of Stakeholder processes in the plan, design and test phases with inclusion of Stakeholders in the testing phase; and comprehensive organizational change management and training to address Stakeholder readiness and engagement.

The RASR project is estimated to take 30 months to implement with an additional O&M investment beyond the three-month solution stabilization period. CECONY and O&R use a Software Development Life Cycle ("SDLC") approach that allows for software to be developed in a robust and repeatable manner. The SDLC process includes various methodologies such as Waterfall, Agile and Iterative. The Company requires that widely accepted methodologies be used for the deployment of system projects. For this project, CECONY and O&R will use a combination of Waterfall and Agile methodologies which include Envision, Plan, Analyze, Build, Test, Deploy and Stabilize phases.

The following is a brief description of each phase:

- **Envision**: This phase focuses on the high-level vision and scope for the project. One of the guiding principles will be to develop synergies and promote standardization where applicable between CECONY and O&R. Standardization facilitates more streamlined business operations and provides a consistent experience for Stakeholders when interacting with both companies. The strategy will be used to inform, add, or modify any requirements. The team will map existing requirements to the key processes for downstream and upstream traceability. This exercise will help to determine the high-level future target state. The deliverable will include the validation a retail access software platform and a systems integrator to guide future efforts.

- **Plan**: The planning phase focuses on establishing the business requirements, functional requirements, and non-functional requirements for a successful implementation. The high-level program plan will be converted into manageable work streams. Detail templates, schedule, deliverables, and performance scorecard will be defined during this phase.

- **Analyze**: During this phase, the project team will perform requirement analysis, assess business processes captured during the pre-implementation planning phase, develop to-be process flows, perform fit gap analysis, and identify and prioritize RICEF ("Reports, Interface, Configuration, Extensions, and Forms") objects. The project team will establish and configure an integrated application within the Oracle CC&B development environment. The platform will be validated and tested before starting the formal build phase of the project.

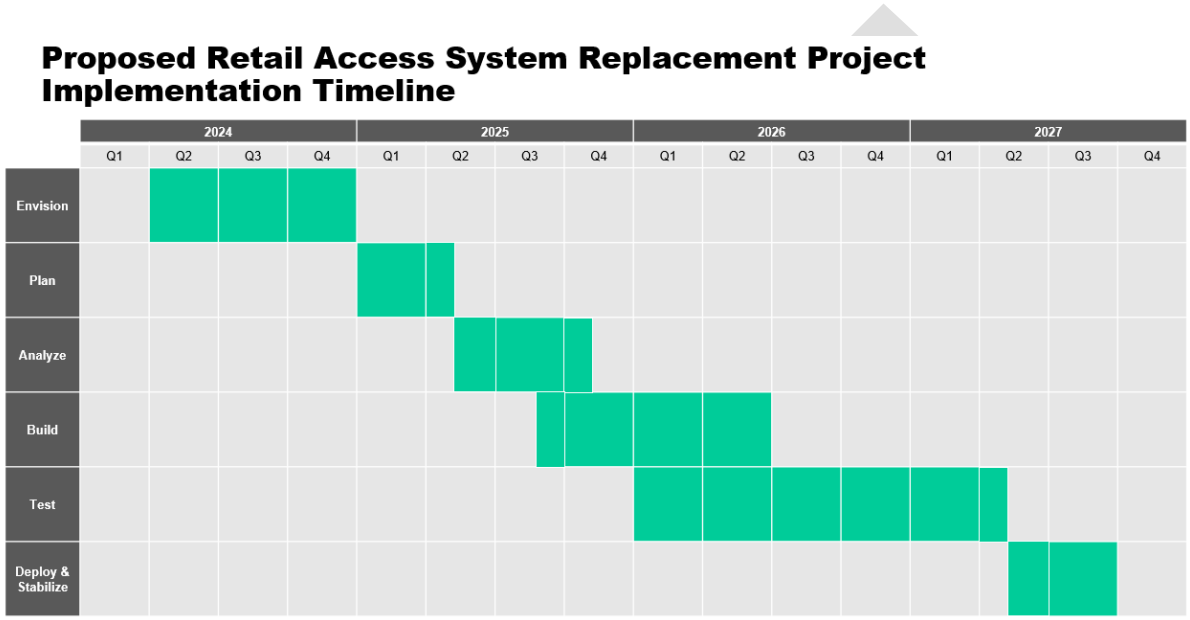
- **Build:** During the build phase, each requirement will be tracked to either a configuration object ("fit") or application development object RICEF ("gap"). Once developed or configured, the requirement will be tracked to a Unit Test case ("UT"). The project team will also conduct targeted System Testing ("ST") for software components ("bundles") developed during this phase to validate that all those configurations and enhancements customizations developed in the solution work as expected.

- **Test:** During the Test Phase, every aspect of the solution will be tested so that the end-to-end product works as expected. The team will prepare and execute the system integration testing ("SIT") to validate the technical interfaces between the solution and other business systems, as well as the functional validation of the business processes in this interaction. User Acceptance Testing ("UAT") will be conducted for business users to test and validate that the product meets the requirements previously established for their functional areas. ESCO Testing will be conducted to validate the high frequency/ high priority processes between the ESCOs and third-party Stakeholders and the Company. Training also begins during this phase so that future system users have the foundational knowledge required to perform their day-to-day activities.

- **Deploy and Stabilize:** This phase is where the developed product becomes available to end-users in a production environment. Any KPIs aligned with the requirements are

tracked to validate expected system outcomes and business benefits. The stabilization phase follows deployment and focuses on system and data monitoring, defect management, and end-user/Stakeholder support to minimize system downtime, performance risks, and enhance end-user/Stakeholder satisfaction.

Figure 3: Proposed Retail Access System Replacement Project Implementation Timeline



Project Team Structure

Labor Plan: Staffing required throughout the project lifecycle will include CECONY and O&R internal resources to support the project and operations, as well as external resources with specialized skillsets for enterprise IT projects. The resource sourcing mix considered several factors, including the availability of resources with the required internal project skillsets within the IT and Customer Operations organizations; alignment of IT managed-service-provider expertise with project activities; System and Business Integrator roles to minimize project risk; and previous experience with CSS and retail access implementations in the industry.

CECONY and O&R Staffing: To incorporate knowledge of Company business and IT operations into the solution design, it is critical to include CECONY and O&R subject matter

experts throughout the project phases. These internal resources will play many key roles, including:

- Functional Designers to define the current and target processes
- Subject Matter Experts to support the definition of the current and target processes
- Technology and Solution Architects to manage technical resources
- Integration Coordination to support the integration of the new solution with existing and retained peripheral systems
- Organizational Change Management to prepare the organizations for the transition to the new enterprise system
- Developers to assess, design, build, and configure the new system and platforms
- Data Conversion to support the translation of current legacy system data to be compatible with the new enterprise system data model
- Test Execution to support the planning and designing of the testing materials, including test scenarios and test scripts
- Training to embed knowledge of the new Retail Access System and improve comfort levels with the new way of working as the Companies approach go-live

In line with industry benchmarks, the Company anticipates XX percent of RASR project staffing to be delivered by CECONY and O&R resources.

External Resources: The staffing plan assumes a sourcing mix between CECONY and O&R and external labor. As per industry best practice, large-scale IT implementations are usually undertaken in partnership with third-party contractors. These resources provide specialized expertise on the enterprise platform and assist in designing, configuring, and testing the solution. These external resources will play many different roles in the new Retail Access System implementation, including but not limited to:

- System Integrators ("SI") and other consultants to advise and support on how best to plan and realize an implementation of this magnitude. Their proven methodologies, experience, and lessons learned will support each phase of the implementation by providing relevant frameworks, guidance, and support to the RASR project team.

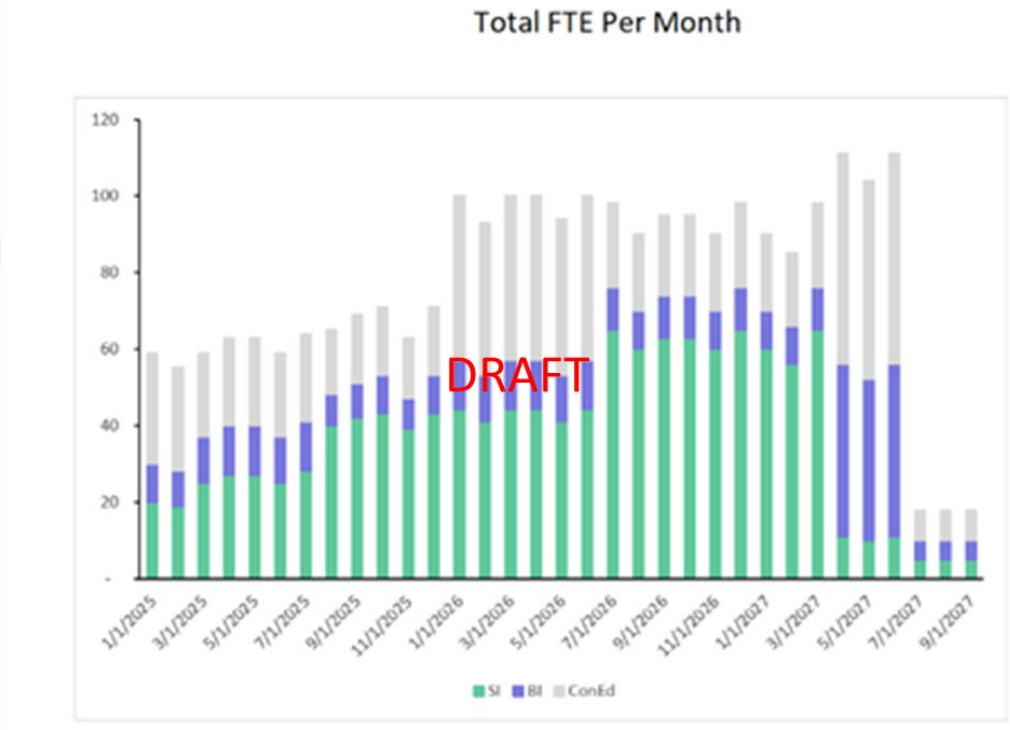
- Software vendors to provide product-specific expertise to support the integration between those products and the other systems they will interface with, as well as to support core design, configuration, and development activities.

- Managed service providers who currently support the legacy technology portfolio, to provide knowledge on the current IT landscape and integration between the legacy technology portfolio and the new solution. These resources will also be assigned certain development and configuration roles.

- Staff augmentation resources to assist in the Deploy and Stabilize phase of the project. These resources will help alleviate potential negative impacts to operations associated with introducing a new solution. They will assume training, front-office, and back-office support roles throughout the Deploy and Stabilize phase.

Figure 4 below illustrates the draft overall staffing plan for the project through the Stabilize phase, excluding Customer Operations and non-project related IT resources.

Figure 4: Retail Access System Replacement Project Staffing Plan

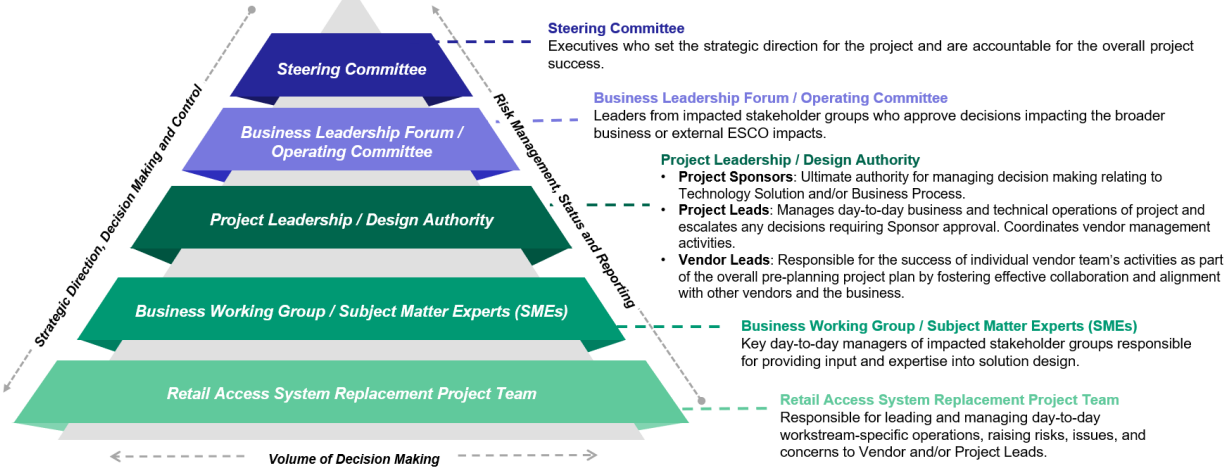


Governance Model

The Retail Access System Replacement governance model is the structured system of rules and processes used to administer the RASR planning and implementation effort. The governance model for the RASR project was established during the pre-implementation planning effort and sets the foundation for the decision-making framework to foster accountability and alignment between the project team, project sponsors and senior leadership, and other Stakeholder groups. The model facilitates project delivery on time and on budget by bringing together Stakeholders for efficient decision-making, with a focus on key decisions that not only shape the project, but also steer the project direction and mitigate risk.

The RASR project team has adopted the governance model to highlight a clear distinction between the varying levels of decision-making within the project and the business. The project governance and decision-making framework outlines who has responsibility and authority to make decisions so that there is clearly defined accountability for all aspects of the project. This effort is the link between, and support for, the governance decisions made by the Steering Committee and the work of the Project Leadership team to deliver the project and its outcomes. A sound project governance decision framework provides for a shared understanding of governance roles, scope, and deliverables. The RASR governance model, depicted in the following figure (Figure 5), demonstrates the structure of RASR governance to facilitate decision-making and manage risks.

Figure 5: RASR Governance Model



Test Plan and Scope

Background and Lessons Learned

The Testing Phase is an essential aspect of the project, underscoring the quality of the build phase. It includes both the turn-key solutions offered by the project's solution providers and the custom solutions to be developed within existing systems, particularly the Company's Oracle CC&B system. Detailed test plans will be crafted for each test phase, outlining the specific testing scope, approach, execution plan, and management processes, including defect management. The test plans will also define the Stakeholders involved, assign roles and responsibilities, establish timelines, and specify the communication channels to be utilized by the project team, for both business Stakeholders as well as for ESCOs, EDI providers and other external Stakeholders.

Lessons learned have been integrated into the plans across all testing phases, to enhance the integrity of testing plans and facilitate a successful implementation. These include:

- Thorough planning for code bundles is essential to verify that the bundles encompass all functionalities within a business process or interface and requires coordination across various business and technical areas.
- Early involvement of Business Functional and IT systems SMEs in test planning and preparation is critical for maximizing test coverage, aligning expectations, and achieving seamless test execution.
- Edge systems within the testing scope may need additional test cases for their systems or downstream interfaces, and identifying these requirements early is essential to allocate adequate time and resources.
- Formation of a dedicated data mining team proficient in SQL scripts and the Oracle CC&B data model will greatly enhance testing efficiency by addressing the diverse data requirements of the testing team, business users, and Edge systems.
- Company business users conducting UAT must receive specialized training to enable them to effectively test the solution against diverse real-life business scenarios.
- Emphasis on managing the scope and duration of the Stakeholder Testing phase is essential to identify potential issues, mitigate risks, and build confidence in the solution.

- Ample notice to Stakeholders to set expectations and align on schedules and participation is required for successful Stakeholder testing efforts.
- The Company should conduct Stakeholder End-to-End Testing after SIT and UAT to validate critical business scenarios that span across the new solution, Oracle CC&B, and key Edge systems and assess the solution's performance.

Test Phases

Detailed descriptions of each test phase are described below:

System Test ("ST"): The System Test phase confirms that each functional and technical component of the solution accords with the defined business requirements. This phase involves validating that the system supports full operability of the interconnected functions within the application, including methods and/or objects within a specific functional area. ST will be executed over multiple iterations or cycles, each logically segmented by the solution components being built and delivered, such as transaction types that govern various retail access processes (e.g., Enrollment, Drop, Usage, Billing, and Payment/Invoicing).

Key considerations for the System Test scope include:

- Validate Business Requirements: Testing will encompass all new business requirements that emerge from strategic workshops with the solution provider, to address challenges identified in the current processes and system.
- Document Updates Necessary to Existing Processes: ST will also evaluate updates to the existing system configurations and extensions required for the implementation of the new solution.
- Define System Testing Scope: The scope identified by the system owners and teams managing current Edge applications, EDI communications, external web interfaces, and the systems and processes of third-party vendor solutions, will be thoroughly tested.
- Conduct Basic Function Testing for Non-Third-Party Integration ("TPI") Business Processes: Major changes to the current solution architecture are expected, including

the creation of new objects, updates or decommissioning to existing objects, and potential modifications required during implementation planning. Basic functional testing for all business processes will address the associated risks of these impacts. This approach will select scenarios based on lessons learned from the Company's 2023 Oracle CC&B implementation.

System Integration Testing ("SIT"): System Integration Testing verifies the seamless integration of all Retail Access Systems and their interfaces with the Company's CSS system and Edge systems, encompassing both inbound and outbound communications. The SIT phase aims to validate that the system components are accurately modeled, configured, and integrated to support the execution of end-to-end business scenarios. This phase confirms that the fully integrated system and all its interfaces can effectively communicate and function cohesively to facilitate the entire business process.

The SIT phase allows for a comprehensive evaluation through multiple testing cycles. These cycles will be logically segregated based on the interfacing systems involved, as well as the volume and complexity of the test scenarios. Key scope considerations for SIT include:

- Reports, Interfaces, Conversions, Extensions, Functions ("RICEF") Requirements**:** SIT will encompass all new interface requirements that have been identified during pre-implementation planning workshops. Testing will assess the solutions proposed to address any issues or inefficiencies found in the current processes and systems.
- Existing RICEF Dispositions**:** SIT will assess the performance and compatibility of existing RICEF components, ensuring they function correctly within the newly integrated environment and align with updated business requirements.

User Acceptance Testing ("UAT"): User Acceptance Testing verifies that the solution effectively meets the essential business processes of Retail Access Systems and complies with the UBP and EDI Guidelines and policies governing transaction flow between the Company and ESCOs. Company end-users are responsible for conducting UAT for Oracle CC&B and Edge systems, while also coordinating the validation of end-to-end EDI transaction processing with third parties.

UAT will focus on Oracle CC&B functions and User Interface ("UI"), Edge system functions and related UI, and Stakeholder Testing for comprehensive EDI transaction flow. The Company will develop comprehensive Stakeholder communication and engagement plans to allow ESCOs and other Stakeholders ample time to incorporate project testing into their schedules. The proposed testing sets are as follows:

- Full Scenarios: This set will test a full range of identified scenarios with at least one external entity of each Stakeholder type, including ESCOs, EDI providers, and Distributed Energy Resource ("DER") providers.
- Subset Scenarios: A subset of scenarios will be tested with a broader group of external entities, with participation based on Stakeholder interest and availability.

Parallel Testing: Parallel Testing compares transaction payloads from legacy Retail Access systems with those from the new system solution. This comparison uses identical input files to verify that the outputs from the old and new systems are consistent and within an acceptable threshold of variance. Any discrepancies discovered during testing will be thoroughly analyzed to confirm the new system replicates or improves upon the legacy system without errors.

Performance Testing ("PT"): Performance Testing assesses the performance of the new system to support all critical functions and requirements of the Retail Access business to confirm that there is no degradation of system performance. PT focuses on confirming that key UI functions, Application Programming Interfaces ("API"), and batch processes perform within acceptable business ranges, verifying the system replacement does not degrade existing performance benchmarks. The PT phase will include multiple cycles of Load, Stress, and Endurance Testing to enable a robust and efficient system that meets the demands of the business operations.

Disaster Recovery ("DR") Testing: DR Testing verifies that a company can swiftly recover and resume operations in the aftermath of unexpected events such as cyberattacks, equipment failures, and natural disasters that threaten business and system functionality. A successful DR testing process requires testing and implementation milestones that are compatible with the schedules and requirements of Stakeholders.

Automation Testing: Automation Testing will leverage the Oracle Utilities Testing Accelerator ("OUTA") tool to develop automated scripts for a select group of approved functional test cases that target Oracle CC&B and integrated application. OUTA will primarily be used for Regression Testing, with scripts forming part of the gating criteria across test tracks such as ST and SIT. Manual efforts will drive functional testing, while automated scripts will revalidate key functionalities previously tested and verify system integrity after new code or configuration deployments.

The regression test suite will consist of two distinct sets of scripts:

- Leveraging Organization Assets: This set will include a subset of test scripts from the Oracle CC&B OUTA regression suite, which will be carefully analyzed and, if necessary, repurposed for the system implementation.
- Developing New Scripts: This set will focus on identifying specific ST scenarios related to the RASR program and Oracle functionalities, which will guide the creation of new automation scripts for OUTA.

As testing progresses, the suite of test cases included in the regression testing may be expanded based on the analysis of test case failures and defect trends. The automation of regression test cases using OUTA will focus on Oracle CC&B functionalities during SIT and any subsequent test phases. While OUTA will facilitate most of the regression testing, there will be instances where certain test cases are not amenable to automation; in such cases, a manual regression testing approach will be employed.

Stakeholder Testing: Stakeholder Testing allows participating external entities such as ESCOs, EDI providers, EDI billers, and DERs to validate the end-to-end functionality of the new system. This testing phase is built upon a partnership between the RASR project team members and Stakeholders to initiate, process, and respond to various EDI transactions, such as 814-enrollments, 814-change requests, 867-usage requests, 810-invoices and 820-remittance requests. This testing will allow the project team and Stakeholders to verify that the implementation works holistically for each business process for both inbound and outbound transactions.

A phased Stakeholder Testing approach will be implemented to manage the impact on ESCOs' and EDI providers' schedules, set expectations early, and promote frequent engagement over the test period. A robust communications and engagement plan will support Stakeholder Testing and will proactively be shared to provide sufficient time for Stakeholders to build project testing activities into their plans. An initial, small set of ESCOs, EDI providers, and DERs engage in the first round of Stakeholder Testing to validate the various transactions. A second round of Stakeholder testing will cover a broader range of ESCOs and external entities to further validate the end-to-end processes.

Operational Readiness Testing ("ORT"): ORT is the final checkpoint in the testing process, aimed at confirming that the system is fully prepared for production release. This follows UAT and other tests and occurs just before system deployment. ORT involves a comprehensive verification process within an operational setting to confirm that all systems are correctly installed and configured with the appropriate data and connectivity. This includes deploying new hardware/software and validating operational controls, alerts, and reports to validate system readiness and address any issues before go-live.

Organizational Change Management

In the context of the RASR project, the purpose of Organizational Change Management ("OCM") is to engage and prepare the end users, business partners, and other internal and external Stakeholders to use the new Retail Access System to facilitate energy market transactions. To achieve this, the Company will engage an OCM services partner to advise on the development and execution of a structured and collaborative change management program that leverages industry-leading practices and toolkits. OCM has been integrated into all program aspects from pre-implementation planning and incorporates lessons learned from the Company's CSS implementation, particularly in external Stakeholder communications and engagement and support plans. Such communications efforts will include:

- Mechanisms to facilitate ongoing dialogue and engagement with external Stakeholders
- Opportunities to continuously gather input from Stakeholders throughout the project

- Early and ongoing communications, continuous opportunities to gather input into the plans, and the flexibility to adjust plans as needed to accommodate Stakeholder requirements throughout the project

COST BENEFIT SUMMARY

Cost Benefit Overview

The Company engaged third-party vendors with experience implementing comparable Retail Access platforms to perform an assessment for a new Retail Access System in April 2024. Between April and September 2024, the RASR project team and vendors conducted a thorough planning effort to replace the legacy Retail Access systems and update assumptions that were used to estimate the project's anticipated costs and benefits. The costs and benefit assumptions were validated through an iterative review process across all relevant Company Stakeholders. This section provides details of all cost reductions, avoidance and benefits outlined in the business case.

Key factors embedded in the RASR cost estimate include: (1) an assessment of the current state business processes, (2) integration and technical architectures, (3) labor resources, (4) non-labor costs, such as hardware and software, and (5) indirect costs.

The Company determined whether labor costs should be classified as capital or O&M by analyzing the activities that would be performed by resource type and role for each phase of the project. Similarly, for the non-labor costs, the capital and O&M determination followed Plant Accounting rules and Generally Accepted Accounting Principles ("GAAP")[12].

[12] Consolidated Edison Corporate Accounting Procedure, Accounting for Transactions between CECONY and ORU, GAP-040C, April 28, 2017

Table 3: Estimated Capital and O&M Costs for RASR Project Through 2027 ($000)

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The following tables provide further details on estimated capital and O&M expenditures by cost category.

Table 4: Estimated Capital Expenditures from 2024 to 2027 ($000)

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The Company expects the RASR project to incur approximately $3.8 million in capital costs by the end of 2024. The new Retail Access System will introduce new IT infrastructure to the Company. As such, associated implementation and ongoing O&M funds are needed to maintain the new systems brought online for the life of the new Retail Access System. The <insert figure here> in O&M costs associated with the effort during the Rate Period include:

- Change Management & Training: These funds are needed for design, development and deployment of training materials and necessary toolkits for Retail Access and other impacted employees

- Software and Hardware Maintenance Costs: These funds are needed to maintain and support necessary Retail Access software and hardware

Table 5: Estimated O&M Expenditures from 2024 to 2027 ($000)

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Financial Benefits

As part of the analysis the Company conducted to support the decision to invest in RASR, potential savings have been identified that the Company will achieve once the new Retail Access System is operational. The Company expects to achieve cost reductions by replacing the legacy Retail Access Systems. This will include reductions in labor and vendor costs as well as the avoided capital costs associated with maintaining and enhancing the existing Retail Access systems. These avoided costs include routine and ongoing maintenance costs and technology investments to support legacy applications.

The major benefits of the new Retail Access System include:

- Decommissioning the legacy Retail Access system(s): Reduce associated maintenance and operation costs, as well as product vendor software subscription costs associated to legacy systems
- Enabling labor efficiencies: Minimize the need for highly skilled labor required to maintain custom-built legacy systems and manage manual processes

Non-Financial Benefits

The new Retail Access system will produce non-financial benefits for the Company and Stakeholders by supporting continual improvement of the Stakeholder experience and enabling or enhancing state regulatory policy initiatives and other Company technology deployments. Information about these benefits is summarized below:

A new Retail Access System will:

- Enhance data quality: Bring systemic checks and balances needed to avoid current issues caused by inaccurate or mis-matched data, enhancing visibility and reporting into open items or discrepancies, as well as reducing overall discrepancy quantities
- Improve operational efficiency: Streamline the transaction management process, reduce reliance on manual processes and minimize file reprocessing efforts
- Enable process improvements: Reduce current transaction processing failures by enabling the ability to isolate and reprocess failed transactions without impacting successful transactions, reducing manual effort from both the Company and Stakeholders, as well as enabling process standardization across the Company
- Introduce automation testing: Shift away from manual testing efforts through the introduction of automation testing, reducing manual effort required to perform testing
- Expand labor pool: Allow access to a broader pool of technical and business resources to support the new Retail Access system

Cost Model Assumptions and Limitations

As part of the current RASR pre-implementation work that started in April 2024 and continues to date, CECONY and O&R have conducted a number of activities to provide insight and assumptions used in the development of the cost and benefit forecast set out in this Business Plan. Key cost model assumptions are detailed in Table 6 below.

Table 6: Cost Model Assumptions

Assumption	Description	Source
Program labor forecast	Detailed activity-based implementation plan from Envision through Deployment developed to forecast total labor hours, cost and FTE associated	Pre-Implementation Planning
Hardware and software (including maintenance)	Total estimate of all hardware and software costs required throughout the full project lifecycle	Pre-Implementation Planning

Capital and O&M allocations	All detailed cost items categorized and allocated to Capital or O&M in line with GAP-40 principles and in consultation with CECONY Regulatory, Finance and Accounting	GAP-40
Inflation	All inflation related costs and benefits impacted by compound annual 2.5% inflation increase	TBD
AFUDC	CECONY – 6.2% O&R – 6.4% Applied to all capital excluding hardware	TBD
Weighted Average Cost of Capital ("WACC")	RY3 post-tax WACC of 6.73%	CECONY Electric Case 16-E-0060
IT Labor support costs	Detailed cost estimate for IT labor related costs associated with changes made to Retail Access systems	Pre-Implementation Planning
Business Labor support costs	Forecast of the business impacts of a Retail Access System Replacement implementation and associated cost	Pre-Implementation

In conclusion, the Company requires a modern Retail Access system to facilitate the delivery of efficient solutions and address increasing customer and Stakeholder needs and expectations. This is supported by the results summarized in the Cost Benefit Summary above. The decision to replace the legacy Retail Access systems would provide an opportunity to share in cost reductions from a shared support service arrangement, as well as provide opportunities for process standardization across the Company. The decision also eliminates costly maintenance and support contracts with the Company's current vendors, along with the higher costs associated with internal support staff. Finally, a new Retail Access System would enable the Company to harness the latest technology to support the business and regulatory demands associated with participation in the Retail Access Marketplace, responding to Stakeholder expectations. For these reasons, the Company is moving forward with a new Retail Access System.

LIST OF ABBREVIATIONS AND TERMS

AFUDC	Allowance for Funds Used During Construction
AMI	Advanced Metering Infrastructure
API	Application Programming Interface
C2M	Customer to Meter (Oracle software product)
CC&B	Customer Care & Billing system (Oracle software product)
CECONY	Consolidated Edison Company of New York, Inc.
CIMS	Customer Information Management System
CIS	Customer Information System
Company	CECONY and O&R
COTS	Commercial-off-the-shelf
CSS	Customer Service System
DR	Disaster Recovery
DER	Distributed Energy Resource Company
Edge System	A secondary Company system which interfaces with the primary system, not a core focus of the solution
EDI	Electronic Data Interchange
ESCO	Energy Service Company
NYS	New York State
O&M	Operation and maintenance
O&R	Orange and Rockland Utilities, Inc.
OCM	Organizational Change Management
OpCo	Operating Company
ORT	Operational Readiness Testing
OUA	Oracle Utilities Analytics (application)
OUTA	Oracle Utilities Testing Accelerator (application)
PSC	Public Service Commission
PT	Performance Testing
RASR	Retail Access System Replacement (project)
RICEF	Reports, Interface, Configuration, Extensions, Functions
SDLC	Software Development Life Cycle
SI	System Integrator
SIT	System Integration Testing
SME	Subject Matter Expert
ST	System Testing
Stakeholders	Third-Party entities including, ESCOs, EDI Billers, EDI Providers, Gas Marketers, DERs, etc., that are directly impacted by RASR
TMS	Transaction Management System
TPI	Third-Party Integration
UAT	User Acceptance Testing
UBP	Uniform Business Practices
UI	User Interface
UT	Unit Test