

*Via Electronic Filing*

February 2, 2018

Honorable Kathleen H. Burgess  
Secretary  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12233-0350

**Re: Case 98-M-1343 - In the Matter of Retail Access Business Rules - Request for Extension of Time**

Dear Secretary Burgess:

On January 19, 2018, the Public Service Commission (“Commission”) Issued an Order Adopting Revised Uniform Business Practices (the “Order”) in the above-referenced proceeding. The Order adopted the revised requirements effective 30 days from the effective date of the Order. For the reasons discussed more fully below, the Retail Energy Supply Association (“RESA”)<sup>1</sup> requests a sixty (60) day extension of time of the effective date of the revised Uniform Business Practices (“UBP”) requirements.

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<sup>1</sup> The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at [www.resausa.org](http://www.resausa.org).

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Although the requirements apply prospectively, to comply with the Order, Energy Service Companies (“ESCOs”) must institute significant internal operational changes, including but not limited to, implementing and testing new transaction processes and the adoption of new or modified document management and/or information technology systems. A thirty (30) day compliance period is not sufficient to enable ESCOs to make the changes necessary to meet the detailed obligations set forth in the UBP amendments promulgated by the Commission.

Additionally, pursuant to 16 NYCRR § 3.7, RESA intends to submit a Request for Rehearing of the Order to the Commission with respect to several of the amendments. As a consequence, certain of the obligations will be subject to potential modification. Thus, postponement of the effective compliance date is also appropriate to allow for disposition of RESA’s rehearing request. Accordingly, for all the foregoing reasons, RESA requests the Commission extend the effective date of the UBP Amendments by 60 days to April 19, 2018.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kyle J. Hayes", with a long horizontal flourish extending to the right.

Kyle J. Hayes

Copy to: Party List