



June 4, 2021

Via electronic mail

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission of the District of Columbia
1325 G Street N.W., Suite 800
Washington D.C., 20005
psc-commissionsecretary@dc.gov

Re: Formal Case No. 1130: In the Matter of the Investigation into Modernizing the Energy Delivery Structure for Increased Sustainability (MEDSIS) -- Initial Comments on Staff Report

Dear Ms. Westbrook-Sedgwick,

Enclosed for filing in the above-referenced proceeding, please find the May 18, 2021 Customer Impact Working Group meeting minutes. Should you have any questions regarding this filing, please contact me.

Respectfully submitted,
for **Mission:data Coalition**

/s/ Michael Murray

1752 NW Market St #1513
Seattle, WA 98107

**FORMAL CASE NO. 1130, IN THE MATTER OF THE INVESTIGATION INTO MODERNIZING THE
ENERGY DELIVERY SYSTEM FOR INCREASED SUSTAINABILITY**

SECOND CUSTOMER IMPACT WORKING GROUP MEETING MINUTES

Date and Time

May 18, 2021 at 10:00am – 12:00pm ET via Microsoft Teams

Attendees

See Attachment 1

Agenda

See Attachment 2

Meeting Minutes

Topic: Functionalities Sought in a Data Sharing System

Ms. Lindsay North (Pepco): The cost estimates provided in its Response included: (i) Green Button Connect (“GBC”) availability for all customers; (ii) adherence to 2020 GBC standards; (iii) a user friendly interface; (iv) self-service registration process for third parties; (v) connectivity validation; (vi) the assumption that customers must reconfirm their intent to authorize a third party every 3 months. Ms. North noted that these points were further explained in Section 2 of Pepco’s comments filed in this docket.

Ms. Alex Fisher (DOEE) asked about the consequences if a customer failed to respond to the 3-month reconfirmation. Pepco indicated that a non-response would trigger termination of data sharing.

Mr. Michael Murray (Mission:data) stated that a 3-month reconfirmation was very unusual. Some states have annual notice provisions, but nothing like a 3-month reconfirmation is required.

Mr. Dennis Jamouneau (Pepco) asked what happens to data-sharing authorizations in other jurisdictions when move-outs occur. Mr. Murray stated that move-outs generally trigger termination of authorization.

Ms. Fisher stated she was concerned with abrupt 3-month termination that could have implications on ongoing energy management contracts. Mr. Murray stated that a 3-month reconfirmation encourages credential-sharing.

Ms. Fisher asked about whether customers could authorize and then revoke authorization at any time. Pepco indicated that customers could opt out at any time and at reauthorization.

Ms. North clarified that Pepco's GBC proposal involves an initial authorization that results in historic data transfer, and then daily data transfers thereafter.

Mr. Daniel Roesler (UtilityAPI) stated that "scope" defines what is transferred. He sees 2 year authorizations as fairly typical in his experience, but the term is changeable, and context-dependent. The GBC standard is flexible for durations of historic and ongoing data transfers. The authorization scope is drafted by the third party and presented to the customer in a web interface to approve or deny; some implementations allow customers to modify the scope presented to them.

Ms. Lara Walt (Staff) stated that Pepco/Mission:data should bring info from other jurisdictions regarding reauthorizations back to the group. Mr. Murray suggested the group begins by defining data types, suggesting that a complete data set includes usage, billing, and account information, as well as eligibility information for different energy efficiency programs. Ms. North asked that Mr. Murray send examples of definitions of data types being shared and why they were selected. Mr. Murray referenced California's Rule 24's definitions of data types, and that several data fields specified therein are specific to CAISO, while the rest are generalizable to other jurisdictions. Ms. North asked for more detail on Rule 24 data fields and what fields are specific to CAISO.

Mr. Donald Coffin (Green Button Alliance) stated that ComEd provides usage data only, as the RetailCustomer part of standard wasn't developed then. Mr. Jeremy Roberts (Green Button Alliance) stated that data types beyond usage data are "optional" in GBCMD in the sense that jurisdictions need to decide what data to provide. Mr. Roberts also stated that there 50 types of data blocks to choose from in the Standard. Mr. Daniel Roesler (UtilityAPI) stated that the GBC standard has "function blocks" that were briefly discussed during the last meeting. Ms. Fisher stated that she thought "all of the above" data types were applicable in D.C., given that in the District EV charging, solar, energy efficiency, demand response, and other applications are all relevant. Ms. North stated that the District we need to keep costs in mind and that there hasn't been strong utilization of Green Button Download My Data. Ms. North requested references from other proceedings regarding costs and utilization of GBC, as a point of comparison with potential cost and benefit to DC customers (who would pay the costs for the implementation but only 1 percent of customers currently utilize Download my Data).

Ms. Walt asked what function blocks are used in other jurisdictions. Mr. Roesler stated that major function blocks used in his experience include three main categories: (i) interval usage data, net metering imports and exports, interval data with cost; (ii) the "usage summary" which includes billing data; and (iii) the "RetailCustomer" which includes account information, such as premise addresses. Mr. Murray suggested starting with defining data types first, then performance information, before delving into function blocks, which can be quite technical.

As for utilization of GBC in other jurisdictions, Mr. Roesler stated that California demand response applications have seen hundreds of thousands of authorizations.

Ms. North asked which function blocks are enabled in California. Mr. Roesler stated that the investor-owned utilities in California offer (i) interval data, (ii) “usage summary with cost,” and (iii) RetailCustomer, so all three major categories of function blocks mentioned previously. Mr. Murray stated that California customers can share all three function blocks’ worth of data, even if they’re not demand response participants.

Mr. Thaddeus Johnson (OPC) asked if there was information or feedback on what customers think about the different types of data they would like to share. Mr. Roberts stated that customers don’t think about technical functionality they want, but rather customers want answers to questions such as “Does solar make sense for me?” Green Button Download My Data utilization is often low because utilities don’t make the file entirely standards-compliant, and utilities don’t fix it because it appears that usage is low, creating a self-reinforcing cycle.

Mr. Murray stated that non-utility participants on today’s call can develop a list of functionalities for next meeting. The group agreed to do this for the next meeting.

Ms. North stated that she wants to know where certain functionalities have been implemented, and customer utilization numbers where available. Murray agreed to provide the information that is publicly available, recognizing that many utilities do not provide information publicly.

Topic: Pepco discussion of GBC by Schneider Electric

Ms. North stated that Pepco launched GBC in 2015 for commercial customers. It allows sharing of 15-minute and 60-minute usage data. Only 11 third parties have registered to date. Mr. Feltrin Davis (Pepco) stated that this offering is only applicable for large C&I customers (27 customers with 6,600 accounts today). A PHI employee has to manually register the customer for an online account and manually add usage/billing data to Schneider Electric’s tool. Then customer can login to the standalone portal and manage GBC subscriptions. Mr. Davis stated that Schneider says they have achieved Download My Data certification. Mr. Coffin stated that no, Schneider has not achieved certification. NAESB members may access the GBC standard for free, otherwise purchasing the standard is \$250.

As for certification costs, Mr. Roberts stated that certification costs are \$3,200 for Connect My Data, while Download My Data is \$3,000. Certifying both at the same time is \$3,700 combined. Connect My Data certification costs are the same regardless of function blocks being tested. Certification for CMD began in late 2018.

Mr. Davis clarified that Pepco did not intend to use Schneider for a larger deployment of GBC to residential customers. Ms. North asked for information on the recent New Hampshire settlement.

Topic: Privacy

Mr. Jamouneau stated that data-sharing must comply with D.C. statutes and existing regulations. Nondisclosure agreements (NDAs) mentioned previously are less important for discussion at this time and in this context, because the third party must agree to abide by certain terms and conditions in order to register in a portal or similar data sharing setting. Given this, the registration process essentially acts as an NDA. Accordingly, Pepco is comfortable handling an NDA-type of document as part of third party registration, meaning that as part of the registration process, a third-party would have to agree to certain terms and restrictions on the use and sharing of customer data. All of this assumes, of course, that providing any customer data to a third-party is preceded by customer consent as defined in District law. Regarding DataGuard, and based on the level of information presented online, Pepco could not gain assurance that DataGuard comports with D.C. law.

Mr. Murray asked which DataGuard provisions might not comport with D.C. law. Mr. Jamouneau stated that DataGuard appeared to have 3-4 exceptions that created the possibility of allowing the utility to share customer data without consent. Mr. Jamouneau stated that the utility has the obligation to require customer consent for any disclosure. In response to a question regarding sharing information with Pepco-contracted vendors, vendors to Pepco are essentially acting as Pepco, such as contracted line crews, and these entities do not need customer permission under District law.

Mr. Murray stated that a “primary” versus “secondary” purpose for sharing customer data is a helpful framing. It’s not that Pepco doesn’t disclose information to its vendors under any circumstances – of course Pepco does, but it’s for a “primary” or regulated purpose, and those entities are bound contractually with Pepco. Customer consent is required for disclosing information for a “secondary” purpose.

Mr. Roesler clarified that “scope” selection enables purpose specification to which customers agree.

Ms. North stated that ComEd’s registration process is something Pepco is comfortable with. Ms. North stated she could not comment at this time why DataGuard is superior or inferior to ComEd’s requirements.

Mr. Murray clarified that the problem isn’t with ComEd’s NDA but rather with the prohibition on information technology (IT) outsourcing that’s required by a strict NDA. Ms. North suggested that the group work off of ComEd’s Rate DART and NDA as a starting point rather than DataGuard, since Rate DART has already been reviewed by Exelon. Mr. Murray asked Pepco to send ComEd’s NDA used in Illinois. Ms. North indicated that she would send the group ComEd’s Rate DART for markup and discussion.

Mr. Roesler stated that financing is often a part of DER installations, and sharing data with banks is important, so there might be several recipients that need to receive customer data that are bundled in a single authorization.

Next meeting topics

The group to address these topics at a minimum:

- List of functionalities
- NDA vs. DataGuard
- Accessibility
- Reauthorization and customer notices

Next meeting scheduled was for Thursday June 10 10:00am ET. The materials discussed above (information categories shared in other states and the ComEd DART tariff) should be sent to all workgroup participants by June 3rd.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1325 G STREET, N.W., SUITE 800
WASHINGTON, D.C. 20005

AGENDA

Formal Case No. 1130
Consumer Impact Working Group

May 18, 2021 at 10:00 a.m.-12:00 p.m.
Via Microsoft Teams

- I. Welcome and Introductions**
- II. Functionalities Sought in a Data Sharing System**
- III. Pepco's Experience with CMD and other Data Sharing Systems in the District of Columbia**
- IV. Accessibility Issues**
- V. Privacy Issues**
- VI. Meeting Schedule**
- VII. Other Issues**
- VIII. Adjournment**



**BEFORE THE PUBLIC SERVICE COMMISSION OF THE
DISTRICT OF COLUMBIA**

**FORMAL CASE 1130: IN THE MATTER OF THE INVESTIGATION INTO MODERNIZING THE ENERGY DELIVERY SYSTEM FOR
INCREASED SUSTAINABILITY**

**Virtual Customer Impact Working
Group May 18, 2021 at 10:00 a.m.**

List of Attendees

<u>NAME</u>	<u>ORGANIZATION</u>	<u>TELEPHONE NO.</u>	<u>EMAIL</u>
Alexandra Fisher	DOEE	202-450-0707	alexandra.fisher@dc.gov
Michael Murray	Mission:data Coalition	510-910-2281	michael@missiondata.io
Donald F. Coffin	Green Button Connect My Data	949-636-8571	dcoffin@greenbuttonalliance.org
Jeremy F. Roberts	Green Button Connect My Data	215-918-1026	jroberts@greenbuttonalliance.org



Thaddeus Johnson	OPC	202-727-3071	tjohnson@opc-dc.gov
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Your Energy. Your Voice.

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