



June 9, 2014

To: Judge Pust and CEUD Workgroup

From: Bridget Nielsen McLaughlin, Center for Energy and Environment

RE: CEUD Workgroup Comments

The Center for Energy and Environment (CEE) believes the Customer Energy Usage Data (CEUD) workgroup (“workgroup”) process has been valuable and appreciates the amount of time all parties have dedicated to participating in it. CEE submits comments in response to items discussed at the May 16, 2014 meeting. Please accept these comments for inclusion in your final report.

Ease of Customer Use

During the workgroup process, much emphasis was placed on providing privacy assurance of customer data. However, providing the tools to efficiently request and generate the data is also significant. Ease of customer use, ease of ability to provide data and ease of ability to request data is crucial. Customers should have to ability to easily access their own energy usage data. Additionally, establishing a platform by which utilities can efficiently provide requested data as well as a simplified process for third parties to request data streamlines processes and minimizes costs to perform these tasks.

Data Aggregation Levels

Throughout the workgroup process, various data aggregation levels were proposed by participants. Both recent “Decisions” as well as current practices in other states were discussed at length, but none agreed upon. Approved aggregation levels are unique to various rules and statutes in each state. While the group may not have come to a consensus on levels of aggregation, we all agreed that protection of customer energy usage data was extremely important. As a result, the group widely supported a third party statistical study of data aggregation levels that provides assurance individual customer data cannot be discerned. The study should consider those rules and statutes unique to Minnesota to determine appropriate aggregation level recommendations. At the time of the workgroup meetings, a funding source for such a study was not available. CEE recommends a “one-time” legislative provision to fund this study be included in the 2015 Minnesota Legislative session.

Data Repository

Fairly late in the workgroup process, discussion of a data repository came to life. Those discussions took two forms; as a central repository, managed by a government agency, that utilities would upload monthly and/or annual data, and as a utility repository where data, in a certain form is available via the utility

website. CEE believes the concept of a repository should be further explored. At this time we take no formal position.

Cost of Data

It has yet to be determined whether costs to provide the data systems and services are paid by the requestor or allocated to all customers. It may be prudent that a third party requesting data is charged for the services. However, CEE believes a third party that has requested data should not be charged when they are: a government entity, contracted by the utility to perform work or conducting research for a public purpose.

Utility Cost Recovery

CEE agrees that if the Public Utilities Commission (“Commission”) determines utilities are required to provide CEUD, is reasonable for utilities to receive cost recovery for prudent system enhancements, labor and other necessary costs.