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*A Locally Owned, Nonprofit Electric Utility*

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June 6, 2014

To: CEUD Workgroup  
Re: Final Comments on CEUD Access

Workgroup Members:

Dakota Electric Association (DEA) is committed to achieving the state energy goals and acknowledges that third-party programs do contribute to the effort. The state energy goals, however, do not take precedence over consumer energy use data (CEUD) privacy.

DEA collects and processes CEUD for business purposes and mandated government reporting. Energy usage, once weather normalized, remains fairly consistent year-over-year and DEA believes existing data resources<sup>1</sup> provide third-parties with a valid baseline to compare program results against.

DEA will continue to work with our member-owners in releasing CEUD for their own use and to properly authorized third-party agents or opt-in programs. If the final result of the workgroup requires some other type of CEUD reporting system, delivering CEUD at levels less than by city/township or ZIP Code, and more frequently than annually, would be administratively burdensome and costly to our member-owners. DEA does not support providing individual usage or GIS information to any state reporting system.

The workgroup did not have time to adequately discuss program participation information (PPI); therefore, DEA would have significant concerns with the inclusion of any PPI reporting requirements.

DEA would encourage the Minnesota Department of Commerce's Division of Energy Resources to modify the data reporting in the existing Regional Energy Information System (REIS) to include anonymized energy by city/township and ZIP Code.

DEA also requests that any Commission order in this matter specifically state that the Commission has the authority to require the disclosure of CEUD information, as ultimately decided by the Commission, and that utilities take on no legal liability for disseminating the CEUD information as ordered.

Respectfully,

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<sup>1</sup>The *Minnesota Utility Data Book* (or Data Book) compiles information reported by electric and natural-gas utilities serving Minnesota. Most of Minnesota's energy use occurs through service provided by various investor-owned, cooperative and municipal and private utilities. To track energy trends, the Minnesota Department of Commerce's Division of Energy Resources uses data in its Regional Energy Information System (REIS), which contains information collected through Minnesota Rules parts 7610.0100 to 7610.1130.  
[https://mn.gov/commerce/energy/images/2010v2\\_Databook.pdf](https://mn.gov/commerce/energy/images/2010v2_Databook.pdf)