



Your Touchstone Energy™ Partner



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A Locally Owned, Nonprofit Electric Utility

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CEUD Workgroup

Re: Reply Comments on CEUD Access

Workgroup Members:

Dakota Electric Association (DEA) like all utilities in the state collects and processes CEUD for business purposes and mandated government reporting. While census block data was discussed at the 4-18-14 CEUD Workgroup meeting, DEA does not track census blocks. It would be administratively burdensome and costly to add and maintain census blocks to our CEUD system. Additionally, postal ZIP Codes within our service area cover multiple townships and cities, as well as, different utilities for one ZIP Code. DEA's best available geo-political sort within our existing CEUD system is by city or township.

Dakota Electric Association submits the following for discussion to the data release issue as it pertains to achieving the state energy goal.

State Reporting Platform

- 1) Utilize existing US Dept. of Energy – Energy Information Administration, Form EIA-861 (Sales to Customers – Residential, Commercial, Industrial, Total) as the state reporting platform to report gross residential and commercial energy usage at both city/township level and by ZIP code (anonymized and large industrial exclusion provision allowed).
- 2) Data would be reported to the Department of Commerce (DOC) on a set schedule and in identical format by all utilities for ease of reporting and use by third-parties.
- 3) Once uploaded to the state reporting platform, DOC assumes all responsibility and liability of the data and the utility is not liable for security or breeches in the data.
- 4) Third-party access to CEUD in the state reporting platform would be through DOC.
- 5) DOC is responsible for any third-party requirements or registration.
- 6) All third-party CEUD requests outside of DOC reporting platform require opt-in by participants.
- 7) Third-parties use a DOC approved opt-in request form for data release from utilities.

Benefits

DOC control over the state reporting platform and third-party request monitoring and/or registration eliminates the need for each utility in the state to verify and/or enter into signed agreements with every third-party seeking CEUD. Citizens within smaller geo-political boundaries than what is available in the state reporting platform preserve their right not to release their CEUD. The administrative burden and cost of gaining opt-in for smaller geo-political boundaries is shifted from utility rate-payers onto the third-parties who ultimately use the CEUD.

Independent agreements between utilities and geo-political divisions are allowed with the understanding that all risk mitigation and liabilities fall within those agreements.

Indemnity

We also request 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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