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February 10, 2020

Debra A. Howland
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New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
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NHPUC 10FEB'20AM11:29

**Re: DE 19-197 Electric and Natural Gas Utilities
Development of a Statewide Multi-Use Energy Data Platform**

Dear Ms. Howland:

On February 3, 2020, representatives of New Hampshire's regulated electric and gas utilities, the Office of the Consumer Advocate, City of Lebanon, Town of Hanover, Mission:data, UtilityAPI, Clean Energy New Hampshire, Freedom Energy Logistics, Direct Energy, Community Choice Partners, Packetized Energy, individual ratepayers Kat McGhee and Patricia Martin, and the Commission Staff met in technical session to discuss preliminary issues relevant to this proceeding, including the development of a procedural schedule for the docket and the potential for party consolidation.

The technical session participants agreed to recommend the following procedural schedule to the Commission:

Action or Event	Date or Deadline
February 3, 2020	Pre-hearing Conference and Technical Session
March 11, 2020	Written Comments on Scope of Docket Circulated to Service List
March 18, 2020	Technical Session to Discuss Comments on Docket Scope
March 20, 2020	Technical Session (Afternoon, if necessary)
May 8, 2020	Technical Session
May 28, 2020	Technical Session
June 25, 2020	Technical Session
August 12, 2020	Parties submit Pre-filed Direct Testimony
August 26, 2020	Technical Session
August 31, 2020	Round 1 Discovery Requests Due

September 10, 2020	Round 1 Discovery Responses Due
September 18, 2020	Round 2 Discovery Requests Due
September 28, 2020	Round 2 Discovery Responses Due
October 7, 2020	Technical Session
October 23, 2020	Rebuttal Testimony
October 30, 2020	Round 3 Discovery Requests Due
November 9, 2020	Round 3 Discovery Responses Due
November 13, 2020	Technical Session
November 17, 2020	Round 4 Discovery Requests Due
November 27, 2020	Round 4 Discovery Responses Due
January 12, 2021	Technical Session/Settlement Conference
February 3, 2021	Hearing

Staff, on behalf of the technical session participants, respectfully requests that the Commission approve the proposed procedural schedule for this proceeding.

Following the pre-hearing conference, the intervenors also discussed potential party consolidation. Several intervenors expressed a preference for delaying a decision on party consolidation until after the first technical session, suggesting that the parties may better understand whether or not their interests align at that time. Staff agrees with this approach.

To better inform the scope of issues considered within this docket, Staff has compiled a scoping comment solicitation and asked the intervenors to circulate responses to the service list by March 11, 2020. A copy of the scoping comment solicitation is attached to this report.

I certify that a copy of this letter will be served electronically on the parties on the service list at the same time it is filed with the Commission.

Sincerely,



Brian D. Buckley
Attorney for Staff

cc: Service List

DE 19-197 Statewide Multi-Use Online Energy Data Platform Scoping Comment Solicitation

SB 284-FN (2019) amended RSA chapter 378 by adding a new subdivision entitled “Multi-Use Energy Data Platform,” effective September 17, 2019. The Commission opened DE 19-197 on December 13, 2019 to determine the following aspects of the platform during DE 19-197: (1) the governance, development, implementation, change management, and versioning of the energy data platform; (2) standards for data accuracy, retention, availability, privacy, and security, including the integrity and uniformity of the logical data model; and (3) financial security standards or other mechanisms to assure third-party compliance with privacy standards. RSA 378:51, II. The Commission must also determine whether the costs associated with the proposed platform may be reasonable and in the public interest. RSA 378:51, III.

To better delineate the form that the statewide multi-use online energy data platform may ultimately take pursuant to the directives of RSA 378:51, II, and describe the potential benefits and costs associated with the platform pursuant to RSA 378:51, III, the Commission Staff solicits comment on the below-described aspects of the platform. Commenters are encouraged to cite quantitative data and qualitative approaches from other jurisdictions while addressing the following issues in their comments:

Functionalities

1. What functionalities should a statewide multi-use energy data platform offer to customers, Distributed Energy Resource (DER) providers, Competitive Suppliers, and other users, including any applications and business uses?
2. What level of energy data granularity appropriately balances costs of collecting, storing, and transmitting energy data with the incremental benefits of increased granularity?
3. How often should the data be updated?
4. Should the customer data platform focus only on energy usage data as measured at the meter, or include other data and/or data sources? If other data sources, how should those sources be included and at what cost?
5. Is the energy data platform under consideration in this docket the appropriate mechanism to provide information on energy system data? Why or why not?

Existing Opportunities for Energy Data Access

1. What are the capabilities of the current platforms through which customers can access their energy data? (Unitil and Eversource both currently offer Green Button Download My Data for their electric customers, and Eversource offers further services to customer through its customer engagement platform)
2. Are capabilities of current platforms a function of current metering/billing infrastructure? If so please describe that infrastructure.

3. Is it possible for existing energy data offerings overlap with, but not be duplicative of, a statewide energy data platform? If so, please explain how.
4. Please describe the approximate customer participation in existing platforms and any marketing strategies are employed to maximize customer participation.

Database Structure and Management

1. Please describe any preferred approaches to governance, development, implementation, change management, and versioning of the platform.
2. Please describe any preferred standards for data accuracy, retention, availability, privacy, and security.
3. Please describe any preferred approaches to utility design and operation of the platform, including but not limited to a common landing page connecting to the data and/or relevant web pages of individual utilities, or alternatively, a single jointly designed and operated database.
4. Please comment on the definitions of the terms “common base of energy data,” and “user-friendly interface,” and describe how they relate to preferred database structure and management approaches.

Community Level Data

1. What is the current process and costs associated with accessing community-level data, how long does the process generally take, and who pays the costs?
2. What type of data is necessary for a community seeking community choice aggregation to competitive suppliers?

Costs and Benefits

1. What are the likely incremental benefits and costs of a single statewide database compared to utility specific energy data access mechanisms?
2. Is there an annual cost associated with maintaining Green Button Connect certification?
3. Should costs associated with a statewide platform be recovered from all ratepayers or through user fees for those seeking: (a) individual data; or (b) aggregated and anonymized community-level data?
4. How might a user fee for the database be structured?

Phasing/Deferral

1. Are there any functionalities which should be considered for deferral or phased implementation during deployment of any energy data platform? Why?
2. How should an energy data platform be designed so that it includes the possibility of reasonably foreseeable functionalities whose costs may not be reasonable at this time, or future functionalities which may not be foreseeable at this time?

Privacy Thresholds

1. Is there a threshold standard for energy data aggregation and anonymization that the Commission should adopt to enable multi-tenant property owners to access whole building energy data while also protecting the privacy of individual customers?
2. Is there a threshold standard for energy data aggregation and anonymization that the Commission should adopt to enable access to community-level data while also protecting large energy users in a single community from having their data disclosed in a manner which unfairly inhibits their business practices or might disclose trade secrets?

Obligations of Database Users

1. Is there a qualification and/or registration process that third parties must complete in order to access either individual or community level data? If so, please describe or provide an example of such a qualification and/or registration process.
2. How long should the registration or certification be in effect and how often must it be renewed?
3. Should third parties be required to execute non-disclosure agreements, cybersecurity agreements or other similar agreement? If so, please describe or provide an example of such an agreement.
4. Should third parties be required to meet certain financial security standards or other mechanisms that may be warranted to assure third parties comply with privacy, cybersecurity, or other standards. If so, please describe or provide an example of such mechanisms.

Issues and Stakeholders Not Yet Identified

1. Are there any stakeholders who have not yet petitioned for intervention but would contribute materially to, and are likely to participate in, the DE 19-197 docket process?
2. Are there any foreseeable issues that should be covered in this docket that are not yet identified in the list of issues and questions above? If so please describe those issues.

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