

**Public Service of New Hampshire d/b/a Eversource Energy
Unitil Energy Systems, Inc. and Northern Utilities, Inc. (together
Unitil)**

Docket No. DE 19-197

Date Request Received: 08/31/2020

Request No. MISSION 1-002

Request from: Mission:Data Coalition

Date of Response: 09/15/2020

Page 1 of 1

Witness: Justin Eisfeller, Christine Riley Hastings

Request:

See 29:26-27, discussing Option 3: "For individual residential customers, the incremental benefit would likely be minimal."

- a. Why do the Joint Utilities believe the incremental benefit of Option 3 would be "minimal"? Please explain.
- b. Did the Joint Utilities make any effort to analyze or quantify the incremental value of Option 3 over Option 2 to residential customers? If so, please provide copies of all relevant documents.

Response:

- a. Individual residential customers in New Hampshire are generally served by a single utility (for electric service), and a subset of those customers may have a second utility if they also have gas service. In that the incremental benefit referenced in the testimony is the ability to aggregate data sets across utilities, and that most residential customers have service from a single utility, for those customers with a single utility's service there would be little or no incremental benefit to them from Option 3. For the subset of customers with two utilities, there would be some incremental benefit in aggregating data, but much of the same benefit of aggregation could be accomplished through manual or programmatic means, likely at lower cost than implementing Option 3.
- b. No. The Utilities expect that an incremental benefit/cost analysis will be done prior to a final decision. Much work needs to be done by all the stakeholders to establish a model for this analysis before it can be performed.

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Docket No. DE 19-197

Date Request Received: 08/31/2020

Request No. MISSION 1-011

Request from: Mission:Data Coalition

Date of Response: 09/15/2020

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Witness: Kimberly Hood, Dennis E. Moore

Request:

See 42-43 concerning a common cyber security assessment process.

- a. Are the Joint Utilities proposing an assessment that can be objectively evaluated on a pass/fail basis?
- b. Are the Joint Utilities proposing that they use their discretion in determining a third party's eligibility?
- c. What did the Joint Utilities mean by "monitoring of third-parties for appropriate use of data"? How would this monitoring be conducted in practice?

Response:

- a. There are various industry standard questionnaires that are designed to assess third party controls in place for the protection of information. The Financial Services industry uses BASEL, for example, the electric industry has developed a standard questionnaire based on NIST controls, and the audit industry uses SOC 1, 2 and 3 type audits. None of these assessments are pass/fail. They assess the controls and their effectiveness. Then the user must determine if this is acceptable for the nature of the data.
- b. There will always be some level of judgement in reviewing control environments as every organization has different controls. Minimum expected control objectives can be established to ensure a consistent review process. However, the more structure and definition required, the less flexibility the third party has to meet the objective of protecting the information in a cost-effective manner.
- c. Monitoring could include either the Utilities or an independent party meeting with the data holder and auditing the use of the data. Monitoring could also include a service that monitors the Dark Web to identify customer data that may have been stolen or put out for sale.

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Docket No. DE 19-197

Date Request Received: 08/31/2020

Request No. MISSION 1-010

Request from: Mission:Data Coalition

Date of Response: 09/15/2020

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Witness: Justin Eisfeller, Christine Riley Hastings, Dennis E. Moore

Request:

See 42:22-26 regarding non-disclosure agreements (NDAs).

- a. Have the Joint Utilities developed an NDA that they propose? If so, please provide a copy.
- b. Under what circumstances would "additional NDAs from departments such as purchasing or IT" be required? Please explain in detail what the Joint Utilities meant by that sentence.
- c. Please provide copies of NDAs currently used by the Joint Utilities' respective departments such as purchasing or IT.

Response:

- a. No, NDAs have not been developed for use with the data platform. The contents of such an NDA will depend on roles and responsibilities of the various entities involved with the platform, to be determined by the Commission.
- b. This discussion refers to the internal procedural logistics. The Utilities expect the NDA process to be delineated with the rollout of the platform.
- c. Please see attached: MISSION 1-010c Attachment A, MISSION 1-010c Attachment B, and MISSION 1-010c Attachment C for the requested documents.

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Docket No. DE 19-197

Date Request Received: 08/31/2020

Request No. MISSION 1-012

Request from: Mission:Data Coalition

Date of Response: 09/15/2020

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Witness: Kimberly Hood, Dennis E. Moore

Request:

See 45:5-6: "Platform users that utilize and store customer data should be subject to external assessment and audit for security management controls." Exactly what kind of "external assessment" or "audit" are the Joint Utilities proposing? Please be specific, including whether the Joint Utilities or another entity would conduct such assessment/audit.

Response:

The most common audit type is an SOC 3 audit. This can be done either by an independent audit firm or by the Utilities.

Liberty Utilities (EnergyNorth Natural Gas) Corp. and
Liberty Utilities (Granite State Electric) Corp. both d/b/a Liberty Utilities

DE 19-197
Development of a Statewide, Multi-Use Online Energy Data Platform

Mission:data Coalition Data Requests - Set 1

Date Request Received: 8/31/20
Request No. MDC 1-4

Date of Response: 9/15/20
Respondent: Heather Tebbetts

REQUEST:

See 27:7-11: “The third party will be required to...satisfy utility review of compliance with privacy standards relative to RSA 363:38, and requirements as established in RSA 378:51, II. This will include a vendor cyber security review by utilities using a common questionnaire.”

- a. Has Liberty developed a document detailing “utility review of compliance with privacy standards”? If so, please provide a copy.
- b. Has Liberty developed a document detailing “cyber security review...using a common questionnaire?” If so, please provide a copy.
- c. Is Liberty proposing a cyber security review that can be objectively evaluated on a pass/fail basis?
- d. Is Liberty proposing a cyber security review in which Liberty uses its discretion in determining a third party’s eligibility?

RESPONSE:

- a. The Company has a confidential enterprise-wide cybersecurity plan that includes policies and standards critical for compliance and consistent implementation of procedures. The minimum list of policies, standards, and frameworks align to NIST SP800-53rev3 policy controls and ISO 27001.
- b. The Company does not have a “common questionnaire” for cybersecurity as each review for security, such as the review for the Tesla Powerwall batteries, has its own set of security issues that need to be identified and reviewed.
- c. The Company does not have a formal cybersecurity proposal at this time.
- d. The third party’s eligibility will be predicated on compliance with Liberty’s cybersecurity plan and any other requirements that come about from this docket.

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Docket No. DE 19-197

Date Request Received: 08/31/2020

Request No. MISSION 1-005

Request from: Mission:Data Coalition

Date of Response: 09/15/2020

Page 1 of 1

Witness: Kimberly Hood, Justin Eisfeller, Dennis E. Moore

Request:

See 38:23-25: "Utilities would ensure that access to data is secured in a manner compliant with company policies, cyber security guidelines, Commission requirements, and all legal and regulatory mandates." Please provide copies of all company policies and cyber security guidelines referenced by the Joint Utilities.

Response:

Eversource and Unitil IT Security policies are confidential documents. Information regarding the Eversource and Unitil Cyber Security programs have been discussed with the PUC as part of NHPUC Rule 306.10.

The Utilities would also note that requests for data continue to increase in scope and volume, for both individual customer and aggregated information. This situation has continued to evolve over the past year and is anticipated to continue in the future. The Utilities continue to develop internal processes to receive, route, verify, respond, and send data in a matter that is secure, accurate, and timely and believe that the data platform may help to provide desired information to customers and third parties in an automated fashion upon implementation.

Public Service of New Hampshire d/b/a Eversource Energy
Docket No. DE 19-197

Date Request Received: 09/22/2020

Request No. LGC 2-004

Request from: Local Government Coalition

Date of Response: 10/02/2020

Page 1 of 2

Witness: Christine Riley Hastings, Christina S. Jamharian, Justin Eisfeller, Jeremy Haynes

Request:

With regard to the responses to LGC 1-005:

- (a) Why does neither utility provide interval data via EDI? In light of the fact that other utilities have provided interval data via EDI for a number of years (e.g. in New Jersey, California, etc.), why do neither Eversource or Unitil do so? What would be the process of updating the EDI systems to do so? Has either utility evaluated this option, and if so, when was the evaluation conducted and why has it not been implemented? Please provide any supporting internal documentation to accompany this response.
- (b) Why is only 12 months of historic usage history available?
- (c) Where is customer usage history stored by the utility after 12 months? Is it stored in a database accessible within the utility through an internal server or is it placed onto a storage medium that must be reloaded onto a computer or server to access?
- (d) For how long does the utility store individual customer usage history in some form and for monthly data and hourly (or more frequent) interval meter data specifically?
- (e) Do the utilities have any written policies on how long customer usage data is retained?
- (f) Do the utilities believe there are any regulatory standards that pertain to how long they retain customer usage data, and if so, please cite?

Response:

- a. For Eversource, when the supplier data transfer process was designed for deregulation, a requirement was defined to standardize on the EDI-814 file format, one of many file formats available. Having a standard simplified the relationship between the utilities and the suppliers – all parties know to use the one file format instead of negotiating and defining a file format for each relationship. Interval data is not part of the EDI-814 standard, so another file format would need to be selected (EDI or some other standard) and then the utilities and suppliers would need to update their systems and processes to use it.

Currently, Unitil provides interval data via e-mail, consistent with the approach stipulated in the Terms and Conditions for Competitive Suppliers, Appendix B, Section II, which states that ‘Interval data is made available to Customers or their authorized agents through e-mail or through basic web access.’

In order to estimate the cost to update Unitil’s systems to allow for the processing of interval data transactions, specific EDI Standards related to interval data transactions would first need to be developed and agreed upon by NH stakeholders, including but not limited to which data elements would be provided, file formats, and protocols for data transfer.

Public Service of New Hampshire d/b/a Eversource Energy
Docket No. DE 19-197

Date Request Received: 09/22/2020

Request No. MISSION 2-005

Request from: Mission:Data Coalition

Date of Response: 10/02/2020

Page 1 of 2

Witness: Christine Riley Hastings, Christina S. Jamharian, Kimberly Hood, Justin Eisfeller

Request:

See the Joint Utilities' response to M:d1-15.

- a. Please confirm that retail suppliers accessing Unitil's EDI system(s) must agree to abide by Attachment E pages 1-3, "Unitil Vendor Security Requirements."
- b. For Unitil, Attachments A, E and Attachment F appear to be the only requirements of retail suppliers that pertains to cybersecurity. Does Unitil require anything else pertaining to cybersecurity of retail suppliers using EDI?
- c. Was Unitil's "Competitive Energy Supplier Trading Partner Agreement" approved by the New Hampshire Public Utilities Commission? If so, please provide the proceeding number, order date and order number.
- d. Was Eversource's "Electric Supplier Services Master Agreement" approved by the New Hampshire Public Utilities Commission? If so, please provide the proceeding number, order date and order number.
- e. Please confirm that Eversource does not have any cybersecurity requirements that apply to retail suppliers using EDI.
- f. If Eversource does have cybersecurity requirements applicable to retail suppliers using EDI from (c) above, please update your response to M:d1-15 accordingly and provide copies of such cybersecurity requirements.

Response:

- a. At this time, retail suppliers are not required to abide by the Unitil Vendor Security Requirements. The continually changing landscape in regards to cyber threats and privacy legislation necessitates that the Utilities continually reassess and adjust our policies and practices regarding the sharing of sensitive and private customer data. Unitil initiated this process for its EDI vendor in 2019 and the Company will be expanding this requirement to include retail suppliers, as it is best practice and provides the best opportunity to protect our customer's data.
- b. No, Unitil does not currently have any other requirements related to cyber security of retail suppliers using EDI.
- c. Yes, the Competitive Energy Supplier Trading Partner Agreement was approved in proceeding number DE 05-178, effective 10/6/2006, in Order No. 24677.
- d. The agreement is not approved, or required to be approved, by the Commission.

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Docket No. DE 19-197

Date Request Received: 08/31/2020

Request No. MISSION 1-004

Request from: Mission:Data Coalition

Date of Response: 09/15/2020

Page 1 of 1

Witness: Kimberly Hood, Dennis E. Moore

Request:

Concerning the Joint Utilities's respective customer web portals:

- a. Does either utility require two-factor authentication or multi-factor authentication today?
- b. Can a residential customer start, stop or move their electric or gas service using only the web portal today?

Response:

- a. The Utilities do not currently require two-factor or multi-factor authentication (MFA). However, MFA has become standard for online transactions and is planned for new systems we intend to implement and added to existing systems in the future. Such controls are not static and the Utilities continue to add security to company systems, including MFA.
- b. Eversource customers must authenticate in order to start, stop or transfer service on our web site. Once logged in, customers can initiate their request electronically.
Unitil customers have the ability to start, stop and move their electric and/or gas service using only the web portal today.

Liberty Utilities (EnergyNorth Natural Gas) Corp. and
Liberty Utilities (Granite State Electric) Corp. both d/b/a Liberty Utilities

DE 19-197

Development of a Statewide, Multi-Use Online Energy Data Platform

Mission:data Coalition Data Requests - Set 1

Date Request Received: 8/31/20
Request No. MDC 1-3

Date of Response: 9/15/20
Respondent: Christine Downing

REQUEST:

Concerning Liberty's customer web portals:

- a. Does Liberty require two-factor authentication or multi-factor authentication today as a prerequisite to a customer logging in to Liberty's web portal?
- b. Can a residential customer start, stop or move their electric service using only the web portal today?

RESPONSE:

- a. Liberty does not currently require two-factor or multi-factor authentication.
- b. No, this is not an option at this time.