

December 8, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E,G002,008/M-21-761

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of the Joint Petition for Approval of the Process to Release Whole Building Data to Facilitate Local Residential Rental Ordinance Compliance

The Petition was filed on October 29, 2021 by:

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The Department recommends **approval of the Petition, with modifications**, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Danielle D. Winner
Public Utilities Rates Analyst

DDW/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E,G002,008/M-21-761

On October 29, 2021, Northern States Power Company doing business as Xcel Energy (Xcel) and CenterPoint Energy Natural Gas (CenterPoint) (collectively referred to as the Utilities) filed with the Minnesota Public Utilities Commission (Commission) a Joint Petition for approval of a process to release whole building data to facilitate rental ordinances within the City of Minneapolis (Minneapolis or the City). The Joint Petition also included two Attachments; the first detailed specifics of the methodology for data release, and the second was a letter from the City requesting that the Commission approve the Joint Petition.

On November 16, 2021, Commission staff released a Notice of Comment Period outlining four questions open for comment, which the Department of Commerce, Division of Energy Resources (Department) responds to below in these Comments.

- 1. Does the Utilities' proposed confidence interval method fulfill the City of Minneapolis' ordinance requiring disclosure of monthly energy use data while protecting utility customers' identity and energy data as required by the Commission's Open Data Access Standards? If not, what other method might be appropriate?*
- 2. If using the Utilities' proposed confidence interval method, does the method adequately protect consumer privacy? If not, how might the method be modified to offer greater privacy protections?*

As detailed in the Joint Petition, the Minneapolis City Council passed the Time of Rent Disclosure Ordinance (Ordinance) in February 2019, which became effective September 2021. This Ordinance requires all Minneapolis residential rental property owners to disclose 24 months of building energy use information to prospective tenants at the time of rental application. It states:¹

47.190. (f) *Time of rent disclosure.* Owners of Class 5, 6, 7, 8, and 9 rental properties shall disclose building energy use information to residential tenants at time of application if an application is provided. If no application is provided, energy use information shall be posted in the rental property in keeping with section 244.2000(a). The property owner or the owner's representative shall provide energy disclosure information provided to

¹https://library.municode.com/mn/minneapolis/codes/code_of_ordinances?nodeId=COOR_TIT3AIP0ENPR_CH47ENAIPO_47.190COMUREBURADI

them by the electricity and natural gas utilities which have franchise agreements with the City of Minneapolis in a format prescribed by the City of Minneapolis.

(1) Owners of Class 5, 6, 7, and 8 properties shall disclose benchmarking information on September first, 2021, and thereafter.

(2) Owners of Class 9 properties shall disclose monthly average energy use information regarding units in the covered property over the previous twenty-four (24) months on September first, 2021, and thereafter.

The Commission's policy for the release of whole building customer energy use data (CEUD) to third parties absent customer consent was addressed in Order Point 1 of the Commission's November 20, 2020 Order in Docket Nos. E,G999/M-19-505 and E,G999/M-12-1344 ("Data Privacy Dockets"). In that Order Point, the Commission adopted the Open Data Access Standards (Standards) which specify conditions for the release of both aggregated and anonymized data to third parties, absent customer consent. Whole-building level data was not included in the anonymized standards, but was included in the aggregation standards, which read as follows:²

III.B. (1) Aggregated CEUD

- (i) Aggregation standard: An aggregated customer energy use data set may include CEUD from no fewer than 4 customers. A single customer's energy use must not constitute more than 50 percent of total energy consumption for the requested data set.
- (ii) CEUD data sets containing 3 or fewer customers or with a single customer's energy use constituting more than 50 percent of total energy consumption may be provided upon the written consent of (1) all customers included in the requested data set, in cases of 3 or fewer customers, and/or (2) any customer constituting more than 50 percent of total energy consumption for the requested data set.
- (iii) Aggregated CEUD may be requested by customer class and/or building or property, defined municipal boundary, county boundary, or U.S. postal code, provided that no data set violates paragraphs (i) and (ii).
- (iv) Aggregated CEUD may be requested by:
 - (a) Tax-exempt organizations based within the United States;
 - (b) U.S. Federal Government agencies and subdivisions thereof; State of Minnesota government agencies, boards, and/or commissions; local government entities with jurisdiction within Minnesota; and government entities of federally recognized tribes that share Minnesota's geography; and

² See Order Point 1, Attachment Section III.B. (1) of the Commission's November 20, 2020 Order in Docket Nos. E,G999/M-19-505 and E,G999/M-12-1344.

<https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={C0ABE675-0000-C518-9013-32F401963281}&documentTitle=202011-168476-01>

- (c) Property owners or managers, so long as the CEUD requested applies only to the property the requestor owns or manages.

Notably, the Commission's Order does not allow for the release of CEUD in cases involving three or fewer customers, unless the specified level of customer consent is obtained. Absent customer consent in these cases, no CEUD may be released to third parties.

Since the Ordinance applies to all rental buildings within the City of Minneapolis, including one to three unit properties, the current process for landlords to adhere to the Ordinance would require them to obtain customer consent from at least one tenant. Depending on number of units, energy use requirements of the property, and movement of tenants through a property over the prior 24 months of occupancy, a landlord may need to obtain customer consent from numerous tenants. The Utilities argue, and the Department agrees, that this could place an unreasonable burden upon landlords attempting to comply with the Ordinance. The Joint Petition attempts to alleviate this burden by proposing a methodology for releasing aggregated whole building data for smaller properties, while still continuing to protect customer privacy.

The proposed confidence interval itself, comprising a high usage point and low usage point, would be based upon the past 24 months of property data. To further help obfuscate actual customer usage data, the Utilities propose to randomly round the high and low figures to the nearest whole dollar.

From the Department's understanding, while a standard deviation figure is used to calculate the high and low points from the average, the details of exactly how it is used will not be disclosed to parties beyond the utility. As a result, while average monthly bills would fall within the confidence interval 95% of the time, the location of the average along the interval spectrum will be either randomized or unable to be easily derived. Finally, the Utilities propose to keep the raw data and the confidence interval calculation methodology from the City.

From the Department's perspective, the proposal appears to meet the requirements of the City's Ordinance. As noted elsewhere in the Data Privacy Dockets, the Department does not have the expertise required to determine whether the proposed methodology would adequately prevent re-identification. However, the Department is generally supportive of the proposed methodology. The Department has for years advocated for a statistically-based methodology of data release that attempts to balance privacy and access, but without success. The fact that the proposed methodology uses confidence intervals at all is, in and of itself, notable within Minnesota's data privacy sphere.

3. Is the proposed data management process sufficient? [footnote omitted] If not, what information is needed?

From the Department's understanding, the proposed procedure would involve the following series of steps. Once a year, the City would provide to the Utilities a list of approximately 17,000 one to four

unit rental properties.³ The Utilities would then work to match the City's property addresses on record with their own billing addresses on record. Once matched, the Utilities would develop for each property a confidence interval for release to the City, based on an actual 95% statistical confidence interval of each set of CEUD, but aggregated to the building level. Properties unable to be matched or with too small of a confidence interval band will still need customer consent.

Although the Department cannot conclusively state whether this data management process would adequately protect customer privacy, the Department believes that the proposed process is generally sufficient. While the proposed process does not appear to directly transfer any personally identifiable information (PII) or CEUD between the City and the Utilities, the Department expects that if such data transfer is needed, the parties would use secure online platforms to transfer the data. Secure online platforms are typically used whenever utilities provide sensitive data to third parties—such as modeling data provided to the Department during resource planning, or PII and CEUD provided to vendors for conservation or affordability program administration. Therefore, the Department would request that the Utilities clarify that such a platform would be used if sensitive data is transferred.

4. Are there other issues or concerns related to this matter?

The Department notes that this matter is first and foremost a matter of deference to another governmental entity. At the moment, the Commission and the City each have policies concerning the release of CEUD that, while not directly at odds, are not exactly complementary. The Department is unwilling to assert that the Commission's jurisdiction over CEUD should trump the City's legitimate policies that further conservation and energy usage. As such, the Department would hazard that unless there is a compelling and urgent public policy reason to not permit such a proposal, the Commission should refrain from encroaching on the City's interest in setting its own ordinances and policies.

Second, the Department notes that the Commission's November 20, 2020 Order in the Data Privacy Dockets explicitly accounts for the fact that the adopted Open Data Access Standards may not be sufficient to address all use cases. Specifically, Standard III.B.(4) states:

- 4) The Commission may set alternative aggregation or anonymization standards upon the petition of any party, as long as those new standards

³ Although the Commission's November 20, 2020 Order allows for the release of data from four unit properties without customer consent, the Joint Petition includes four unit properties within the proposal. As stated in the Joint Petition, 87% of the City's rental properties are one-to-four unit properties; this indicates to the Department that it would be administratively simpler to treat four-unit properties in a similar manner as one-to-three unit properties.

do not restrict public access to energy data deemed in the public interest
nor allow for the identification of individual customers within a data set.

The Department notes that strictly speaking, this Standard may not have been necessary for the Commission to adopt, as parties may petition the Commission for unspecified reasons as a Miscellaneous Filing under Minn. R. 7829.0100, subp. 11. However, the Department appreciates that the Commission essentially gave itself permission to set alternative standards if necessary. The proposal contained in the Joint Petition does not appear to conflict with Standard III.B.(4).

Third, although the Department is cannot conclusively state whether this methodology would adequately protect customer privacy, the Department recognizes that there are two different types of identification prevention at work in the proposal: both the use of a confidence interval (rather than the use of specific or averaged data points) and the use of an information firewall between the Utilities and the City. This double layer of protection appears reasonable to the Department, as it mimics a “double blind” treatment often used in well-designed academic studies.

Finally, the Department notes that this proposal appears to have been borne out of months of dedicated good faith efforts by both the Utilities and the City to strike a balance between protecting customer privacy and helping the City enforce its Ordinance. Within the context of the Data Privacy Dockets, this is no small achievement. The Department notes that, provided the proposal is shown to be successful at meeting both goals, this process and methodology might eventually serve as a template for other utilities developing data release practices.

For the above reasons, the Department supports the approval of the Joint Petition. However, the Department has a suggestion to the parties and two proposed modifications to the proposal.

The first is a data management suggestion for the Utilities and the City. The Department notes that matching building addresses to utility premise number data is a process already being performed by vendors and utility staff for the Conservation Improvement Program (CIP), and possibly by other programs. Provided it saves ratepayers time and money, it may be possible for parties in the instant proceeding to piggyback on, outsource to, contract with, or otherwise utilize these existing resources to perform its property matching work.

Additionally, as with all dockets involving utilities using sensitive or proprietary information, the Department notes that the Commission and the Department must be able to review specific data, equations, and procedures if needed. Therefore, while the Utilities may need to keep information from the City to better anonymize the data, the Department cannot support the approval of the Joint Petition without the ability to access such data.

Finally, the Department recommends that, should the Commission approve the Joint Petition, the Commission should require the Utilities to file a short, 1-paragraph update on the program at the time that they file their annual compliance filings within the Data Privacy Dockets.

Therefore, provided the Utilities confirm that they will use secure online platforms for transferring sensitive data, the Department recommends that the Commission approve the Joint Petition, with modifications ensuring that the Commission and Department may access any raw data and equations upon request and that the Utilities will provide short summaries of the program in their annual data compliance filings.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E, G002, G008/M-21-761

Dated this 8th day of December 2021

/s/Sharon Ferguson

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