



414 Nicollet Mall
Minneapolis, MN 55401



505 Nicollet Mall
Minneapolis, MN 55401

October 29, 2021

–Via Electronic Filing–

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

RE: JOINT PETITION FOR APPROVAL OF THE PROCESS TO RELEASE WHOLE
BUILDING DATA TO FACILITATE LOCAL RESIDENTIAL RENTAL
ORDINANCE COMPLIANCE
DOCKET NOS. E,G999/CI-21-1344, E,G999/M-19-505 AND
E,G002,008/M-21-____

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy) and CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (CenterPoint Energy) (collectively referred to as the Utilities), submit to the Minnesota Public Utilities Commission (Commission) submit this Joint Petition for approval of a process to release whole building data to facilitate local residential rental ordinances. We appreciate how busy the Commission, the Department, and other stakeholders are at this time and understand the need for flexibility in moving this petition forward through the regulatory process.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 337-2096 or bridget.dockter@xcelenergy.com or Jennifer Roesler at (612) 330-1925 jennifer.roesler@xcelenergy.com or Emma Schoppe at (612)

321-4318 or emma.schoppe@centerpointenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

BRIDGET DOCKTER
MANAGER, POLICY & OUTREACH
XCEL ENERGY

/s/

EMMA SCHOPPE
LOCAL ENERGY POLICY MANAGER
CENTERPOINT ENERGY

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF A COMMISSION
INQUIRY INTO PRIVACY POLICIES OF
RATE-REGULATED ENERGY UTILITIES

DOCKET NOS. E,G999/CI-12-1344

IN THE MATTER OF A PETITION BY
CITIZENS UTILITY BOARD OF
MINNESOTA TO ADOPT OPEN DATA
ACCESS STANDARDS

E,G999/M-19-505

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
AND CENTERPOINT ENERGY FOR
APPROVAL OF THE PROCESS TO RELEASE
WHOLE BUILDING DATA TO FACILITATE
LOCAL RESIDENTIAL RENTAL
ORDINANCE COMPLIANCE

E,G002,008/M-21-____

JOINT PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy) and CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, (CenterPoint Energy) (collectively referred to as the Utilities), submit to the Minnesota Public Utilities Commission (Commission) this Joint Petition for approval of a process to release whole building data to facilitate local residential rental ordinances.

On February 15, 2019, the Minneapolis City Council passed the Time of Rent Disclosure Ordinance (Ordinance) which requires all Minneapolis residential rental property owners to disclose building average energy use information to prospective

tenants at the time of their rental application.¹ The Utilities understand that the goals of this Ordinance are to promote energy efficiency and empower renters with more information about their rental choices and agree that these are worthwhile goals.

The City of Minneapolis (City) has an interest in making it as simple and streamlined as possible for property owners to comply with this Ordinance. Accordingly, they have asked the Utilities to assist in developing processes for property owners to access data on average energy usage. Property owners who are not also the CenterPoint Energy or Xcel Energy account holders at the property may be challenged to obtain energy usage information from their tenant(s); these challenges may be reduced if property owners can obtain data without obtaining consent from their tenant(s) first.

The Utilities, however, are mindful of our obligation to protect customer energy usage data (CEUD). As required by the Commission's January 19, 2017 Order in Docket No. E,G999/CI-12-1344, we will not generally release CEUD to any person other than the account holder or someone authorized by the account holder to receive their CEUD, unless that CEUD can be anonymized so that the CEUD of individual customers cannot be identified.²

As required by the Commission, in Docket Nos. E,G999/M-19-505 and E,G999/CI-12-1344, both Utilities have developed processes to aggregate and anonymize CEUD from buildings with four or more account holders for purposes of supporting benchmarking ordinances, such as the Ordinance at issue.³ However, the Ordinance goes further than most benchmarking ordinances in that it requires all property owners to disclose average energy use data, even in the case of smaller properties that have fewer than four tenants.

In this filing, the Utilities propose a new process to assist owners in buildings up to four units to comply with the Ordinance. As described in further detail below, the

¹ Minneapolis, Minn., Ordinance No. 2019-007, § 1 (Feb. 15, 2019). On March 1, 2021, in Docket No. E,G999/GR-19-505, the Utilities submitted their respective annual Compliance Filings as required by Order Point seven of the Commission's November 20, 2020 Order Adopting Open Data Access Standards and Establishing Further Proceedings. Each of the Utilities' Compliance Filings introduces the City (City) of Minneapolis's Time of Rent Disclosure Ordinance for Commission consideration as an additional use case for data release requirements.

² In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G999/CI-12-1344, Order Governing Disclosure of Customer Energy Use Data to Third Parties, Requiring Filing of Privacy Policies and Cost Data, and Soliciting Comment, Order Point 2 (Jan. 19, 2017).

³ In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards, Compliance Filing, Docket No. E,G999/M-19-505 and E,G999/CI-12-1344, Order Adopting Open Data Access Standards and Establishing Further Proceedings, Order Point 7 (Mar. 1, 2021).

Utilities propose to release to local governments a confidence interval of whole building average energy usage that can be disclosed to third parties without customer consent while maintaining the privacy of actual customer energy usage. A confidence interval is a range of values defined so that there is a specified probability that the true value of a specific parameter lies inside the range. The Utilities propose to disclose to local governments a 95% confidence interval around the parameter of average monthly energy use. Further, the Utilities propose to adjust the endpoints of the confidence interval via random rounding so the true historical average usage at the building is unlikely to be the exact middle of the range provided.

The Utilities propose to develop this confidence interval via a review of historical whole building usage at the subject property. The Utilities believe that our proposed approach will help the City accomplish the goals of its Ordinance, while protecting our customers' privacy. While the confidence interval does provide an incoming renter some useful information about the average energy usage of a given building, it would be practically impossible to use the provided confidence interval to determine the exact average energy usage for a previous renter or to derive actual historical annual or monthly usage.

We request that the Commission find that our proposed approach for whole buildings up to four units reasonably protects a customer's energy usage data. Additionally, the Utilities request to be allowed to release confidence intervals to local governments as a result of local residential rental property ordinances, without first obtaining customer consent.

We recognize the resource challenges of the Commission, the Department, and other stakeholders at this time and understand the need for flexibility in moving this petition forward through the regulatory process.

I. SUMMARY OF FILING

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing accompanies this Petition.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the companies have served a copy of this petition on the Department of Commerce and the Office of the Attorney General – Antitrust and Utilities Division. A summary of the filing has been served on all parties on the service lists for Docket Nos. E,G999/CI-12-1344, E,G999/M-19-505 and the companies' miscellaneous gas and electric service lists.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company 414 Nicollet Mall Minneapolis, MN 55401 (612) 330-5500	CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, a Delaware Corporation 505 Nicollet Mall P.O. Box 59038 Minneapolis, MN 55402 (612) 372-4664
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B. Name, Address, and Telephone Number of Utility Attorney

Xcel Energy Shubha M. Harris Principal Attorney Xcel Energy 414 Nicollet Mall, 401 – 8 th Floor Minneapolis, MN 55401 (612) 215-4517	CenterPoint Energy Erica Larson Counsel CenterPoint Energy 505 Nicollet Mall Minneapolis, MN 55402 (612) 321-4334
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C. Date of Filing and Date Modified Rates Take Effect

The date of this filing is October 29, 2021. The Utilities respectfully request that the Commission approve this Joint Petition for approval of a process to release whole building data to facilitate local residential rental ordinances. The Utilities propose to implement this additional Use Case immediately following a Commission decision. The request has no impact on customer rates.

D. Statute Controlling Schedule for Processing the Filing

The Utilities are not aware of any statute that controls the schedule for processing this filing. This Petition falls within the definition of a Miscellaneous Filing, under Minn. R. 7829.0100, subp. 11, because no determination of Xcel Energy's or CenterPoint Energy's general revenue requirement is necessary. Minn. R. 7829.1400, subps. 1-4 permits comments in response to a miscellaneous filing within 30 days of filing, with

reply comments 10 days thereafter.

E. Utility Employee(s) Responsible for Filing

Xcel Energy

Bridget Dockter
Manager, Policy & Outreach
Xcel Energy
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CenterPoint Energy

Emma Schoppe
Local Energy Policy Manager
CenterPoint Energy
505 Nicollet Mall
Minneapolis, MN 55402
(612) 321-4318

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Xcel Energy

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Any information requests in this proceeding should be submitted to Lynnette Sweet at the Regulatory Records email address above and Erica Larson at the email address above.

V. DESCRIPTION AND PURPOSE OF FILING

This Joint Petition requests approval of a process to release residential whole building data to facilitate local time of rent ordinances. Under the proposed process, local government agencies with residential time of rent ordinances may request whole building energy use data that will be provided to building owners or prospective tenants for residential rental properties with up to four units, that cannot be aggregated according to the Utilities respective Whole-Building Data Aggregation and Release Policies.⁴ The Utilities propose to fulfill these requests by providing statistically modified energy use information that reasonably protects CEUD for small residential rental properties.

A. Background

i. Commission's Previous Actions Related to the Release of CEUD

In Docket No. E,G999/CI-12-1344, the Commission engaged in a multi-year process to consider and issue orders related to the privacy policies of regulated electric and natural gas utilities. Some of the outcomes of that proceeding that are particularly relevant to this Petition include:

- The Commission defined CEUD as “data collected from the utility customer meters that reflects the quantity, quality, or timing of customers’ natural gas or electric usage or electricity production.”⁵
- The Commission prohibited utilities from disclosing CEUD without the customer’s consent unless the utility has adequately anonymized the CEUD.⁶

⁴ In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards, CenterPoint Energy’s Compliance Filing & Xcel Energy’s Compliance Filing, Docket No. E,G999/M-19-505 and E,G999/CI-12-1344, Order Adopting Open Data Access Standards and Establishing Further Proceedings, Order Point 7 (Mar. 1, 2021)

⁵ In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G999/CI-12-1344 Order Governing Disclosure of Customer Energy Use Data to Third Parties, Requiring Filing of Privacy Policies and Cost Data, and Soliciting Comment, Order Point 1 (Jan. 19, 2017).

⁶ Id. at Order Point 2.

- The Commission approved a model CEUD release consent form⁷ and subsequently approved CenterPoint Energy’s and Xcel Energy’s adaptations of the model consent form.⁸
- Xcel Energy⁹ and CenterPoint Energy¹⁰ filed aggregation and release policies describing their processes for releasing aggregated CEUD to owners of four-or-more unit buildings.

On August 6, 2019, Citizens Utility Board of Minnesota filed a Petition in Docket No. E,G-999/M-19-505 requesting that the Commission adopt Open Access Data Standards for the sharing of aggregated or anonymized CEUD. On November 20, 2020, the Commission approved modified Open Access Data Standards and stated that they would be implemented in a multi-step process.¹¹ Initially, the Commission ordered that the standards would apply to whole building aggregated CEUD for building owners and benchmarking purposes. The adopted Open Access Data Standards state that aggregated CEUD may include CEUD from no fewer than four customers.¹² The adopted Open Access Data standards would also allow the release of anonymized CEUD from fifteen or more customers,¹³ although that provision has not yet been implemented. No part of the Open Access Data Standards allows a utility to release CEUD for fewer than four customers.

ii. *City of Minneapolis Ordinance and Utilities’ Actions*

The City of Minneapolis, Xcel Energy, and CenterPoint Energy formed the Minneapolis Clean Energy Partnership¹⁴ (Partnership) in January 2015. The

⁷ In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G999/CI-12-1344, Order Approving Customer Energy Consent Form, Order Point 1 (June 9, 2017).

⁸ In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G999/CI-12-1344, Order Approving Consent Forms and Modifying Approval Process, Order Point 1 (Oct. 26, 2017).

⁹ In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G999/CI-12-1344, Xcel Energy CEUD Aggregation and Release Policies of Rate Regulated Energy Utilities (February 10, 2017).

¹⁰ In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G999/CI-12-1344, CenterPoint Energy Whole-Building Data Aggregation and Release Policies Compliance Filing (July 20, 2018).

¹¹ In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards, Compliance Filing, Docket No. E,G999/M-19-505 and E,G999/CI-12-1344, Order Adopting Open Data Access Standards and Establishing Further Proceedings, (Nov. 20, 2020).

¹² In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards, Compliance Filing, Docket No. E,G999/M-19-505 and E,G999/CI-12-1344, Order Adopting Open Data Access Standards and Establishing Further Proceedings, Order Point 1 (Nov. 20, 2020).

¹³ Id.

¹⁴ [Minneapolis Clean Energy Partnership | A first-in-the-nation partnership between the City of Minneapolis, Xcel Energy and CenterPoint Energy \(mplscleanenergypartnership.org\)](https://mplscleanenergypartnership.org)

Partnership was formed as a result of utility franchise agreement renewal discussions and how the City could better leverage utility resources to advance the goals outlined in its Climate Action Plan and 2040 Energy Vision.

According to the City of Minneapolis, renters make up more than half of the City's population, and 87% of rental properties are one-to-four unit buildings. To provide renters with more information about how much their utility bills will cost, the City has adopted certain energy disclosure strategies to promote energy efficiency and housing affordability. The Minneapolis Time of Rent Disclosure (Ordinance) requires residential rental property owners to provide prospective renters with energy use information at the time of rental application.¹⁵

The City's Commercial and Multifamily Residential Building Rating and Disclosure states.¹⁶

47.190. - Commercial and multifamily residential building rating and disclosure. ...
(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 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...**

Since passing its rental ordinance, Xcel Energy, CenterPoint Energy, and the City of Minneapolis, through the Clean Energy Partnership,¹⁷ have worked collaboratively on tools to help facilitate the disclosure of energy usage information while preserving our customer's privacy considerations.

For multi-unit rental properties that can be aggregated according to the Utilities respective Whole-Building Data Aggregation and Release Policies,¹⁸ the Utilities made

¹⁵ Minneapolis, Minn., Ordinance No. 2019-007, § 1 (Feb. 15, 2019).

¹⁶ [CHAPTER 47. - ENERGY AND AIR POLLUTION | Code of Ordinances | Minneapolis, MN | Municode Library](#)

¹⁷ In 2014, Xcel Energy and CenterPoint Energy entered into a Clean Energy Partnership agreement with the City of Minneapolis, whereby the Utilities agreed to help the City reach its climate goals.

¹⁸ In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards, CenterPoint Energy's Compliance Filing & Xcel Energy's Compliance Filing, Docket No. E,G999/M-19-505 and E,G999/CI-12-1344, Order Adopting Open Data Access Standards and Establishing Further Proceedings, Order Point 7 (Mar. 1, 2021)

modifications to their respective data access and aggregation tools¹⁹ that enable a rental property owner to access aggregated whole building energy use information for compliance with the Ordinance.

The Utilities interpret Commission Order Governing Disclosure of CEUD to Third Parties, Requiring Filing of Privacy Policies and Cost Data, and Soliciting Comment, Docket No. E,G999/CI-12-1344, to require they receive customer consent before releasing CEUD to a third party where it is not possible to anonymize CEUD. Therefore, to comply with the Minneapolis Ordinance, property owners of smaller rental properties, up to four units, must obtain CEUD directly from their renters or from the Utilities with their renter's consent.

The Utilities understand that the purpose of the Ordinance is to promote energy efficiency and empower renters with more information about their rental choices. The Utilities support these goals, provided that renters are also protected in their reasonable right to privacy. However, the process for rental property owners to collect CEUD or consent for Utilities to release CEUD, is an undue burden on current renters, rental property owners, the Utilities, and the City of Minneapolis for the implementation of the Ordinance.

Currently, the City is not requiring that rental property owners of one-to-four-unit properties comply with the Ordinance pending a regulatory decision of a process to release CEUD without customer consent.

B. Process to release whole building data to facilitate residential rental ordinance compliance

To help cities, such as Minneapolis, institute local renter disclosure ordinances, the Utilities propose a statistical methodology to report whole building energy use information that will both protect CEUD and provide energy use information renters and property owners can use in their decision making.

The Utilities propose computing and releasing whole building energy use by sample mean confidence intervals for 24 months of customer energy use data at residential rental properties that cannot be released as average energy use under the Utilities respective whole-building data aggregation policies. The confidence intervals will report meaningful average energy use information without disclosing CEUD averages. The reported sample mean confidence interval will consist of a range of values

¹⁹ <https://energydataportal.centerpointenergy.com/> & <https://rentalusage.xcelenergy.com/>

containing, but not identifying, the actual sample average. A unique interval showing a high and low average endpoint will be reported for each property, solely using that property's sample data. Our proposed method is further described in Attachment A.

Customer energy usage data in Minnesota typically displays strong monthly variation due to seasonal changes in heating, cooling, and lighting demands. This variation leads to uncertain estimates of customer energy use averages because samples measured for different periods of time will produce different estimates of the average. Confidence intervals by design are well suited for reporting CEUD averages because they account for inherent uncertainties associated with month-to-month energy use variation.

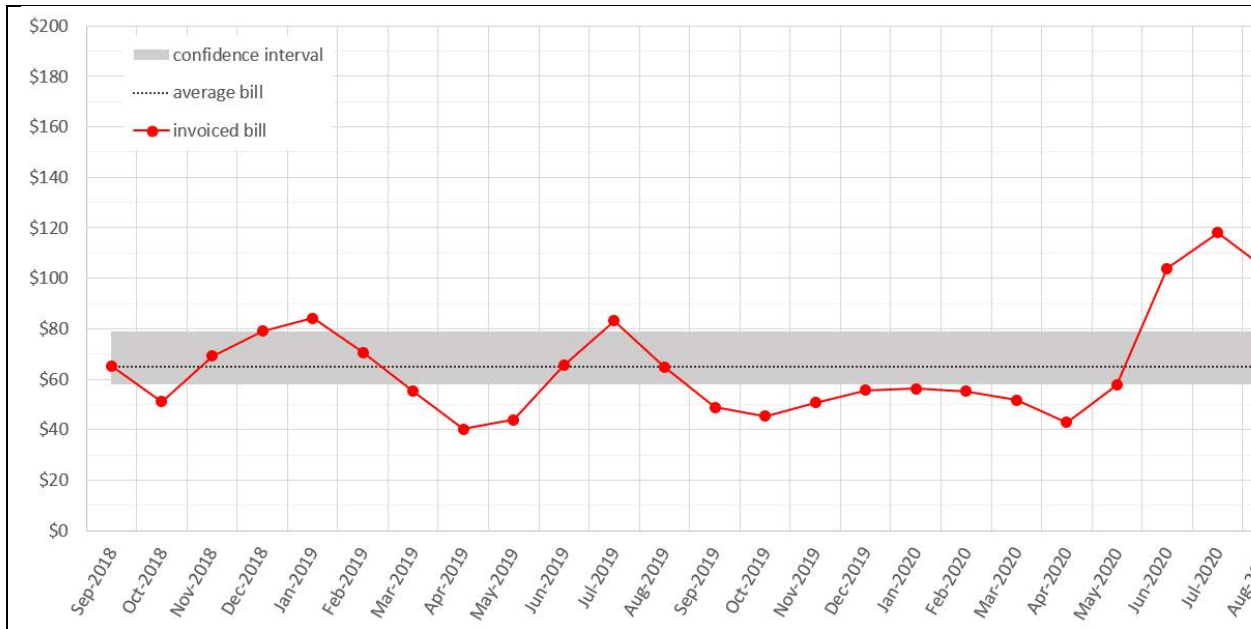
Confidence intervals will also account for sample size differences that single point estimates do not. For example, historical utility business practice has used staggered billing schedules. Consequently, in a fixed calendar period of 24 months, customers may have more or less than 24 energy usage bills. These differences create issues with statistical consistency for reporting calendar schedule averages because not all customers will have the same number of data points. Sample mean confidence intervals help alleviate these consistency issues by accounting for sample size differences and their affects.

This statistical methodology disassociates customer energy use behavior from the energy consumption of a specific residential property while providing a secure method to protect CEUD and useful qualitative results that help fulfill the spirit of local time of rent disclosure ordinances.

Figure 1 shows a sample 24-month electrical usage history for a specific Xcel Energy customer in Minneapolis, Minnesota. The figure shows monthly metered usage data, the sample average, and an asymmetric confidence interval. The confidence interval is representative of historical usage at this residential premise but does not reveal the absolute actual low or high usage points – nor is it a simple average. Rather, it is a statistically meaningful combination of both the average and its monthly variation. Customer's data is protected because the customer's true average cannot be easily back calculated²⁰ from the reported interval.

²⁰ Tests were performed to verify reported confidence intervals are sufficiently wide to deter back-calculation of the sample average. In some rare cases the observed sample variance will be too small to create a sufficiently wide range of values. Intervals for these rare cases cannot be reported.

Figure 1: Confidence Interval Methodology Illustration



The Utilities believe that this process to release confidence interval data sufficiently protects CEUD and allows for the ease of implementation the City for the ordinance to be successful. The confidence interval data enables property to property comparisons of usage trends by showing the effects of monthly variance. Two properties may have similar historical averages but greatly different variance. Confidence intervals for properties with large usage variances will be wider, indicating that less confidence should be assigned to the data interpretation. Confidence intervals are also capable of better indicating energy efficiency improvements which tend to reduce both energy use averages and variance.

C. Minneapolis Data Management Process

Annually, the City of Minneapolis will provide the Utilities with a list of approximately 17,000 one-to-four unit rental property addresses. An initial effort to match the City’s list of addresses with each Utilities’ billed property addresses resulted in a match rate of 70% on the natural gas side and 90% on the electric side. Each Utility will perform the confidence interval methodology on each property, producing a range with high and low endpoints. Next, each Utility will send the resultant protected per property information back to the City for use in their ordinance compliance. For those properties the Utilities are unable to match to the City’s rental license list, customer data release authorization will be required.

Table 1. is an illustration of information the Utilities propose to provide the City of Minneapolis in accordance with this process. False addresses have been provided for illustrative purposes and to protect customer privacy and anonymity.

Table 1: Illustrative Example of Data Released

	Property Address	Gas Cost Confidence Intervals	
1	1 Main Street, Minneapolis MN 55406	\$27.00	\$39.00
2	2 Main Street, Minneapolis MN 55406	\$34.00	\$47.00
3	3 Main Street, Minneapolis MN 55406	\$34.00	\$49.00
4	4 Main Street, Minneapolis MN 55406	\$38.00	\$52.00
5	5 Main Street, Minneapolis MN 55406	\$42.00	\$60.00
6	6 Main Street, Minneapolis MN 55406	\$58.00	\$83.00

The City will provide a direct link to property specific energy use information for building owners or prospective renters to access. Attachment B is a letter of support from the City that further explains how it will utilize the protected data provided by the utilities.

D. The Request is in the Public Interest

The Utilities take our responsibility to secure and protect our customers’ data very seriously. We have developed policies and practices for measured release of customer data, including CEUD that we believe balance our customers’ interests in confidentiality and privacy with third party interests in expanded access to further public policy objectives.

The Utilities’ request for approval of this process to release residential whole building data to facilitate local time of rent ordinances allows not only Minneapolis but other local governments to offer additional property information to prospective renters so they may make informed choices about where to live and ease the burden of the building owners, renters, the Utilities, and cities to obtain individual renter consent. The Utilities have developed a methodology that reasonably protects customer CEUD while minimizing the role the building owner and current renters must play in the reporting that will allow for larger Ordinance compliance. Reports of customer energy usage confidence intervals may better enable property to property comparisons of usage trends by showing the effects monthly variance. Confidence intervals are also capable of better indicating energy efficiency improvements which tend to reduce both energy use averages and variance.

CONCLUSION

Xcel Energy and CenterPoint Energy respectfully request that the Commission approve our Joint Petition for a process to release whole building data to facilitate local residential rental ordinance compliance.

Dated: October 29, 2021

Northern States Power Company & CenterPoint Energy

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

IN THE MATTER OF A COMMISSION
INQUIRY INTO PRIVACY POLICIES OF
RATE-REGULATED ENERGY UTILITIES

DOCKET NOS. E,G999/CI-12-1344

IN THE MATTER OF PETITION BY
CITIZENS UTILITY BOARD OF
MINNESOTA TO ADOPT OPEN DATA
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E,G002,008/M-21-____

PETITION

SUMMARY OF FILING

Please take notice that on October 29, 2021 Northern States Power Company, doing business as Xcel Energy and CenterPoint Energy, filed with the Minnesota Public Utilities Commission a Joint Petition for approval for a process to release whole building data to facilitate local residential rental ordinance compliance.

Proposed sample mean confidence interval calculations for CEUD up to 4-unit residential properties.

For each property having $U \in [1, 4]$ subunits and M_j calendar months of proportioned CEUD, the energy cost for the j th unit for the i th month is denoted as x_{ji} . Proportioning is necessary to establish analysis of exactly 24 calendar months of data. Generally, billing cycles are not aligned with calendar months. To compute calendar month averages it is first necessary to linearly proportion billing data to the calendar.

The average energy cost will be estimated as the sample mean of monthly data for all units as shown in Definition 1.

<p><i>Definition 1 : sample size (n) and sample mean (\bar{x}) calculations</i></p>	$n = \sum_{j=1}^U \sum_{i=1}^{M_j} 1$ $\bar{x} = \frac{\sum_{j=1}^U \sum_{i=1}^{M_j} x_{ji}}{n}$
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Property level monthly variance will be estimated as the pooled variance as shown in Definition 2.

<p><i>Definition 2 : pooled variance (s^2_{pooled}) calculation</i></p>	$s^2 = \frac{\sum_{j=1}^U (M_j - 1) \sum_{i=1}^{M_j} (x_{ji} - \bar{x})^2}{\sum_{j=1}^U (M_j - 1)}$
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Sample mean confidence intervals will be estimated using standard formulae as shown in Definitions 3. The reportable lower and upper confidence limits will be rounded to whole numbers (for example, \$10 as opposed to \$10.3989) by applying *floor* and *ceiling* functions to the calculated limits, respectively. Each utility will report the two confidence limits to the City for sharing with property owners. The utilities will not provide the city with parameters ($\alpha_L, \alpha_U, PRECISION$), intermediate calculation results (n, \bar{x}, s^2), or the source CEUD so as to ensure that actual CEUD is protected. The reported interval is guaranteed to contain the sample mean, but without revealing its value.

<p><i>Definition 3 : Lower (x_{LCL}) and upper (x_{UCL}) confidence limit calculations</i></p>	$x_{LCL} = \text{floor} \left(\bar{x} - t_{(n-1)}(\alpha_L) * \sqrt{\frac{s^2}{n}}, PRECISION \right)$ $x_{UCL} = \text{ceiling} \left(\bar{x} + t_{(n-1)}(\alpha_U) * \sqrt{\frac{s^2}{n}}, PRECISION \right)$
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In Definition 3 $t_{n-1}(\alpha)$ represents the critical value of a *t-Distribution* having $n - 1$ degrees of freedom at an α level of significance.¹ Asymmetric sample mean confidence intervals will be created using different levels of significance for the lower and upper confidence limits, specifically $\alpha_L \neq \alpha_U$. To establish comparable results the same three calculation parameters ($\alpha_L, \alpha_U, PRECISION$) will be used for all properties.

¹ The t-Distribution is a probability distribution having a shape similar to the normal distribution. Statistical sampling distribution theory establishes that the sample mean \bar{x} will be approximately normally distributed about its expected value $E[x]$, and the variance normalized difference between the sample mean and its expected value $\left(\frac{\sqrt{n} * (\bar{x} - E[x])}{\sqrt{s^2}} \right)$ will have a t_{n-1} distribution.



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October 28, 2021

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
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Saint Paul, MN 55101

RE: Docket Nos. E,G999/CI-12-1344, E,G999/M-19-505, AND E,G002,008/M-21-___ IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY AND CENTERPOINT ENERGY FOR APPROVAL OF THE PROCESS TO RELEASE WHOLE BUILDING DATA TO FACILITATE LOCAL RESIDENTIAL RENTAL ORDINANCE COMPLIANCE

Dear Mr. Seuffert:

Thank you for the opportunity to support the Xcel Energy ("Xcel") and CenterPoint Energy ("CenterPoint") Joint Petition for approval of the process to release whole building data to facilitate our local residential rental ordinance compliance.

The City of Minneapolis ("Minneapolis") adopted a suite of Residential Energy Disclosure policies in 2019 to raise energy awareness for households, provide energy cost information during housing decision-making, create market incentive for energy improvements by property owners, and reduce energy burden through improved residential building stock. These policies align with the Minneapolis Climate Action Plan, which committed to energy disclosure strategies promoting energy efficiency and housing affordability.

Our time-of-rent ordinance ("Ordinance") requires that rental property owners disclose energy cost information to prospective residential tenants at time of their rental application. The ordinance gives renters upfront insight into total housing costs for a given building and incentivizes building owners to make energy upgrades that lower utility bills. City staff have been working with Xcel and CenterPoint via the Minneapolis Clean Energy Partnership to reduce barriers and streamline compliance for property owners.¹ We are implementing the ordinance in two phases:

Phase 1: Effective September 1, 2021 for residential apartment buildings with five or more units; 2,100 buildings and 32,000 units in total. Property owners utilize new utility webtools to compile energy data for their buildings, create energy cost reports, and share them with prospective renters. Energy costs over the last 24 months are reported as 1) monthly average dollars per square foot and 2) monthly average dollars per bedroom.

Phase 2: Delayed Implementation (while awaiting the Commission's review of the utilities' joint petition) for rental homes and apartment buildings of one to four units; 17,000 buildings and 32,000 units in total. Many of these housing units, which are some of the least energy efficient

¹ Minneapolis Clean Energy Partnership [2019-2021 Work Plan](#). Partnership Activity EE.5: SUPPORT RESIDENTIAL ENERGY DISCLOSURE POLICIES THROUGH DATA ACCESSIBILITY AND TOOLS

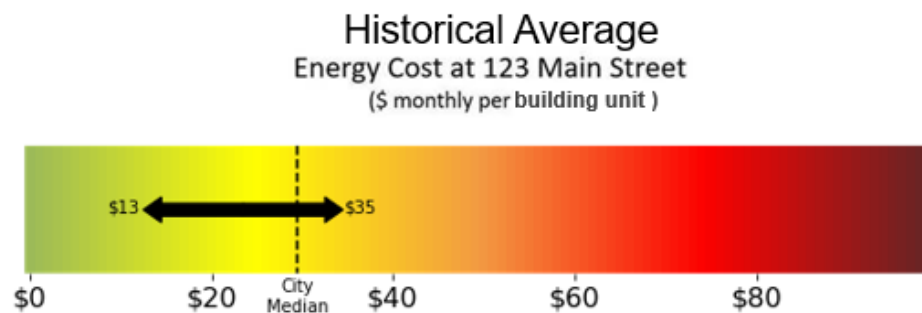
building stock, are concentrated in the Minneapolis Green Zones and communities where low-income and low-wealth households reside. These areas and the housing units they contain represent much of the naturally-occurring affordable housing within Minneapolis. Implementation of Phase 2 is a high priority for Minneapolis and its residents.

Minneapolis is strongly committed to collaborating with the utilities and the Commission to find a path forward for Phase 2 that provides renters with address-specific energy cost information and allows for comparison between housing options. In coordinating with the utilities on implementation of Phase 2, we understand that the utilities believe they do not have a streamlined compliance method and therefore propose this plan for the City of Minneapolis and the Commission's consideration.

In reviewing the proposal, we strongly support implementing the utilities' preferred approach as we believe it will offer valuable energy cost information to prospective renters and meet the spirit of our ordinance. We also appreciate that the utilities believe that this solution is complimentary to the utilities' Commission-approved data disclosure policies and is replicable for other local jurisdictions.

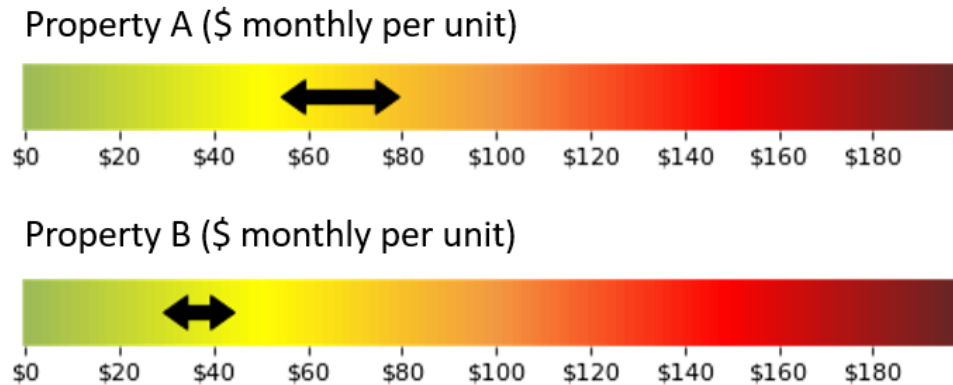
As outlined by the utilities, each utility will provide to the Minneapolis the upper and lower values of the confidence interval for each property for which they have matched meter data. Minneapolis will normalize these confidence interval values for each property to allow for easier comparison between properties. To normalize by building size, we may use data available from property records, such as building square footage, number of bedrooms, and number of residential units to align with that of Phase 1. Current plans for disclosure are to provide this "energy cost intensity" data in an interactive web tool that allows for comparison across rental properties and against a city-wide median, and in a format that also allows for comparison with the energy reports created in Phase 1.

Minneapolis intends to await the Commission's action on the utilities' petition before further refining how data may be publicly displayed by Minneapolis. However, we have already discussed this topic at length with the utilities and considered potential display options. One example of how an individual property's confidence interval (shown as a black band) may be displayed and compared to a city-wide median is shown below:



The visual illustrates that the property at 123 Main Street did not have meaningfully different energy costs over the last two years than the city-wide median.

An example of how two properties' respective confidence intervals may be displayed for comparative purposes follows:



In this example, Property B (with a lower and non-overlapping confidence interval) is shown to have meaningfully lower energy costs over the previous 24 months than Property A.

The display of energy cost intensity data will be accompanied by resources for renters to best understand and use the information being presented. In particular:

- The confidence interval will be displayed and conveyed in a way that is accessible to the public. This includes using terminology other than “confidence interval” and displaying data in a way not easily misinterpreted as a range of possible energy costs (such as the highest and lowest expected monthly bill).
- Explanatory language will say that the information provided allows for a comparison between properties over the last 24 months, potentially indicating which properties are more energy cost efficient than others. However, the information provided should in no way be considered a guarantee of future energy costs, given the large impacts of weather, fuel prices, and individual tenant behavior. The information doesn’t represent the actual usage behavior of previous tenants.
- We will clarify that future energy costs will vary based upon changing energy use characteristics of the property. If a property owner makes energy efficiency improvements, the energy cost intensity will likely fall over time, all else being equal.
- The energy cost information is intended to be the beginning of a building-specific energy conversation between a prospective renter and a property owner. The information provided does not account for all variables that affect energy usage. For instance, a property with space cooling is likely to have higher electricity costs than a property without. The renter and property owner should discuss and clearly understand who will be responsible for which energy bills since some or all of the energy cost data displayed may not be directly paid by a tenant through a utility bill.

Minneapolis appreciates the efforts by the utilities to identify a path to ease implementation of our Ordinance to benefit tenants of up to four unit properties. We also appreciate the Commission’s consideration of the utilities’ proposal. We welcome the Commission and interested parties to directly contact Luke Hollenkamp (Luke.Hollenkamp@minneapolismn.gov) for any questions regarding the ordinance and our planned implementation.

Sincerely,

Kim W. Havey, LEED AP, AICP
Director, Division of Sustainability

CERTIFICATE OF SERVICE

I, Mustafa Adam, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

Docket Nos. E,G999/CI-12-1344
E,G999/M-19-505
Xcel Energy Miscellaneous Gas & Electric Service List
CenterPoint Energy Miscellaneous Gas Service List

Dated this 29th day of October 2021

/s/

Mustafa Adam
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_12-1344_Official
Chad	Adams	ChadA@swmhp.org	Southwest Minnesota Housing Partnership	2401 Broadway Ave Slayton, MN 56172	Electronic Service	No	OFF_SL_12-1344_Official
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Arnie	Anderson	ArnieAnderson@MinnCAP.org	Minnesota Community Action Partnership	MCIT Building 100 Empire Drive, Suite 202 St. Paul, MN 55103	Electronic Service	No	OFF_SL_12-1344_Official
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_12-1344_Official
Martin S.	BeVier	bevi0022@umn.edu		4001 Grand Ave South # 3 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_12-1344_Official
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Scott	Bohler	scott.bohler@ftr.com	Frontier Communications Corporation	2378 Wilshire Blvd Mound, MN 55364-1652	Electronic Service	No	OFF_SL_12-1344_Official
Jon	Braman	jbraman@brightpower.com	Bright Power, Inc.	11 Hanover Square, 21st floor New York, NY 10005	Electronic Service	No	OFF_SL_12-1344_Official
Sheri	Brezinka	sbrezinka@usgbc.org	USGBC-Minnesota Chapter	701 Washington Ave. N Suite 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official

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Brent	Christensen	brentc@mnta.org	Minnesota Telecom Alliance	1000 Westgate Drive, Ste 252 St. Paul, MN 55117	Electronic Service	No	OFF_SL_12-1344_Official
Andrew	Clearwater	N/A	Future of Privacy Forum	1400 Eye St NW Ste 450 Washington, DC 20005-6503	Paper Service	No	OFF_SL_12-1344_Official
Roger	Colton	roger@fsconline.com		34 warwick road belmont, ma 02478	Electronic Service	No	OFF_SL_12-1344_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1344_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_12-1344_Official

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Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_12-1344_Official
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Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
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Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-1344_Official
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Tammy	Pust	Tammy.Pust@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_12-1344_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_12-1344_Official
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_12-1344_Official
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Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-505_Official

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Caroline	Horton	chorton@aeonmn.org	Aeon	901 N 3rd St Ste 150 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_19-505_Official
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Kevin	Lewis	kl@bomampls.org	Greater Minneapolis BOMA	Suite 610 121 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)	1600 West 82nd Street, Suite 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_19-505_Official
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Tammy	Pust	Tammy.Pust@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-505_Official
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_19-505_Official
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-505_Official

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Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Jenny	Unknown	jenny@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-505_Official

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