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April 29, 2024

**VIA eFILING**

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

**Re: In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards; Docket No. E,G-999/M-19-505**

**In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities; Docket No. E,G-999/CI-12-1344**

**REPLY COMMENTS OF CENTERPOINT ENERGY**

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas respectfully submits the attached Reply Comments as requested by the Minnesota Public Utilities Commission's December 1, 2023, Notice of Comment Period in the above referenced dockets.

If you have questions, please contact us at [jason.loos@centerpointenergy.com](mailto:jason.loos@centerpointenergy.com), 612-321-4410, or [emily.suppes@centerpointenergy.com](mailto:emily.suppes@centerpointenergy.com), 612-321-5363.

Sincerely,

*/s/ Jason Loos*

Associate General Counsel

*/s/ Emily Suppes*

Director, Regulatory Affairs

Attachments

C: Service Lists

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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Katie Sieben  
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Chair  
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Commissioner  
Commissioner

In the Matter of a Petition by Citizens Utility Board  
of Minnesota to Adopt Open Access Data Standards

Docket No. E,G-999/M-19-505

In the Matter of a Commission Inquiry into Privacy  
Policies of Rate-Regulated Energy Utilities

Docket No. E,G-999/CI-12-1344

**REPLY COMMENTS OF  
CENTERPOINT ENERGY**

**INTRODUCTION**

CenterPoint Energy Resources Corp d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy” or the “Company”) respectfully submits the following Reply Comments to the Minnesota Public Utilities Commission (“Commission”) as requested by the Commission’s December 1, 2023, Notice of Public Comment Period (“Notice”) in this Docket.

**COMMENTS**

The Company appreciates the initial comments from parties and provides the below Reply Comments in response to topics raised to the questions posed by the Commission.

- 1. What specific use-cases for anonymized CEUD could be used by the Commission to continue to incrementally apply the Standards while maintaining the balance between customer privacy and CEUD access?**

To date, the Company has not been able to identify specific use-cases for anonymized CEUD that maintain the balance between customer privacy and CEUD access. CenterPoint Energy notes that all the studies cited involve electricity usage, specifically looking at demand. The Department of Commerce (“Department”) recommends application of anonymized data for study and program design by citing the University of Minnesota.<sup>1</sup> Likewise, the data cited by the Citizens Utility Board of Minnesota (“CUB”) involved an analysis of electricity use, again looking

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<sup>1</sup>See Comments submitted in this docket on March 4, 2024, by Department, page 3.

at demand.<sup>2</sup> CenterPoint Energy does not recommend additional special use-cases for anonymized CEUD as the proposed support and analysis provided relates to electric utilities.

**2. What modifications, if any, should be made to the anonymized data access contract requirements set by ODAS section III.B.(2)(v)?**

CenterPoint Energy shares the concerns of other utility commentators of anonymized data being subject to re-identification. As such, the Company joins the other utilities to request the Commission reconsider its current approved Open Data Access Standards (“ODAS”) to exclude anonymized data. At this time, CenterPoint Energy does not recommend additional use cases be added for gas utilities, as there is no support and analysis specific to potential impacts to gas utilities.

**3. What modifications, if any, should be made to the shortest allowable time interval for anonymized data set by ODAS section IV.A.? Are utilities currently able to produce anonymized data sets using hour-long time intervals?**

CenterPoint Energy notes time interval supporting data is focused on electric utilities. To date, the Company has received and supplied data requests for as short as one-month intervals, the shortest time interval available. Under existing meter technology there is not an efficient method for the Company to obtain data at one-hour intervals. CenterPoint Energy does not currently recommend any modifications for anonymized data set by ODAS section IV.A.

**4. What considerations should the Commission make regarding the application of the 15/15 anonymization screen to the shortest allowable time interval (currently one-hour intervals)? Does each interval of time need to pass the 15/15 anonymization screen?**

The Company agrees with the other utilities that each time interval must bypass the anonymized screen and that this level of detail could add administrative burden. CenterPoint Energy does not support changing to a smaller than 15/15 anonymization screen for the shortest allowable time interval.

**5. Given the new customer exemptions added to the Standards at section III.E. by the Commission’s August 1, 2023 Order, is it necessary for the Commission to continue to maintain its previous policy of exempting large commercial and industrial customers with peak demands of 5 MW or more from aggregated building level and anonymized CEUD datasets?**

The Company appreciates the input of parties on this issue and understands the sensitivities in competitive industries; however, as this issue is more specific to electric utilities, the Company does not recommend a specific position.

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<sup>2</sup>See Comments submitted in this docket on March 4, 2024, by CUB, pages 6-7.

**6. Should the Commission consider making any technical corrections to the Standards?**

If anonymized data is allowed, CenterPoint Energy agrees with the Department on amending Standard B.2.(iv)(c), to specify entities provide or seek demand response or energy efficiency.<sup>3</sup>

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

CenterPoint Energy shares Xcel Energy's concerns and joins their request for guidance on how the Commission's definition of Personal Identifying Information ("PII") works with breach notification laws.<sup>4</sup>

**CONCLUSION**

CenterPoint Energy appreciates the discussion provided amongst parties in this docket and the opportunity to provide these Reply Comments. The Company continues to support the discretion given to utilities to provide technical expertise and determine whether to share anonymized data. CenterPoint Energy is happy to continue to work with stakeholders to share relevant data, but sharing data needs to be done in a way to protect customer information and avoid re-identification. The Company is concerned about potential administrative costs to collect and anonymize time interval data that is shorter than one month.

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<sup>3</sup>See Comments submitted in this docket on March 4, 2024, by Department, page 6.

<sup>4</sup>See Comments submitted in this docket on March 4, 2024, by Xcel Energy, page 7.

## CERTIFICATE OF SERVICE

I, Melodee Carlson Chang, certify that on Monday, April 29, 2024, I served the attached Reply Comments of CenterPoint Energy on the attached service lists for Docket Nos. E,G-999/M-19-505 and E,G-999/CI-12-1344. The filing was delivered electronically or, if indicated on the attached service list, placed in the U.S. Mail at Minneapolis, Minnesota.

/s/ Melodee Carlson Chang

Senior Regulatory Paralegal  
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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_12-1344_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_12-1344_Official
Caitlin	Straabe	caitlin.straabe@mdu.com	Great Plains Natural Gas Co.	400 N 4th St  Bismarck, ND 58501	Electronic Service	No	OFF_SL_12-1344_Official
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Patricia	Whitney	patricia@pwhitneylaw.com	St. Paul Assn of Responsible Landlords	627 Snelling Avenue South  St. Paul, MN 55116	Electronic Service	No	OFF_SL_12-1344_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_12-1344_Official