

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

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	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-21-761

**INITIAL COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Initial Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) Notice of Comment Period issued on November 16, 2021. The OAG’s Initial Comments respond to the Joint Petition filed by Northern States Power, doing business as Xcel Energy (“Xcel”) and CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy (“CenterPoint”) (collectively, “Utilities”) seeking approval to release a dollar range of approximate average monthly energy cost data for one-to-four-unit rental properties to the City of Minneapolis (“City”) to assist in implementing the City’s Time of Rent Disclosure Ordinance (“Ordinance”). While there are laudable public policy considerations underlying the Ordinance, certain aspects of the Joint Petition and how the City intends to implement the Ordinance implicate

privacy concerns. The Commission should take steps to mitigate the potential privacy concerns associated with the Joint Petition and the City’s intended methods of implementing the Ordinance.

BACKGROUND

I. OVERVIEW OF THE COMMISSION’S PAST CEUD-RELATED DECISIONS

Over the past decade, the Commission has solicited stakeholder comments, convened a working group, and issued several orders governing the disclosure of customer energy use data (“CEUD”) by Minnesota’s regulated electric and natural gas utilities.¹ While these efforts have produced a wide array of CEUD policies and procedures, the OAG provides a brief overview of those most germane to the Joint Petition and the City’s Ordinance:

- In an Order dated January 19, 2017, the Commission both 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”²—and prohibited utilities from disclosing CEUD without customer consent unless “the utility has adequately protected the anonymity of the CEUD.”³
- To facilitate the disclosure of adequately anonymized CEUD, the Commission’s January 2017 Order also mandated that each utility file CEUD aggregation and release policies prior to implementation.⁴
- Both Xcel and CenterPoint subsequently filed with the Commission the utilities’ respective aggregation and release policies, which described their processes for releasing aggregated CEUD to owners of more-than-four-unit buildings.⁵
- In an Order dated June 9, 2017, the Commission approved a model CEUD release consent form⁶ and subsequently approved adaptations thereof proposed by both Xcel and CenterPoint.⁷

¹ See generally *In the Matter of Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities*, Docket No. E,G999/CI-12-1344 (hereinafter “Docket 12-1344”); *In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Access Data Standards*, Docket No. E,G999/M-19-505 (hereinafter “Docket 19-505”).

² Docket 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) (“2017 CEUD Order”).

³ *Id.* at Order Point 2.

⁴ *Id.*

⁵ Docket 12-1344, Xcel Energy CEUD Aggregation and Release Policies of Rate Regulated Energy Utilities (February 10, 2017); Docket 12-1344, CenterPoint Energy Whole-Building Data Aggregation and Release Policies Compliance Filing (July 20, 2018).

⁶ Docket 12-1344, Order Approving Customer Energy Consent Form, Order Point 1 (June 9, 2017).

⁷ Docket 12-1344, Order Approving Consent Forms and Modifying Approval Process, Order Point 1 (Oct. 26, 2017).

- In an Order dated November 20, 2020, in response to a Petition filed by the Citizens Utility Board of Minnesota, the Commission approved modified Open Access Data Standards for the sharing of aggregated or anonymized CEUD to be implemented in a multi-step process.⁸
- Specifically, the Commission’s November 2020 Order adopted whole building aggregated CEUD standards for building owners and benchmarking purposes from four or more customers;⁹ this Order also adopted standards, not yet implemented, that would allow the release of anonymized CEUD from fifteen or more customers.¹⁰

II. OVERVIEW OF THE CITY’S ORDINANCE

Per the Joint Petition, “renters make up more than half of the City’s population.”¹¹ The City has 2,100 residential buildings with five or more units, totaling 32,000 units,¹² which comprises approximately 13% of the City’s rental stock.¹³ The remaining 87% of the City’s rental properties are one-to-four unit rental homes and apartment buildings, comprised of 17,000 buildings and 32,000 units in total.¹⁴ The City notes that many of its one-to-four unit rental homes and apartment buildings include “some of the least energy efficient building stock, [and] are concentrated in the Minneapolis Green Zones and communities where low-income and low-wealth households reside.”¹⁵

In 2019, the City adopted a suite of Residential Energy Disclosure policies in an attempt to “raise energy awareness for households, provide energy cost information during housing decision-making, create market incentive for energy improvements by property owners, and

⁸ See generally Dockets 12-1344 and 19-505, Order Adopting Open Data Access Standards and Establishing Further Proceedings (Nov. 20, 2020).

⁹ *Id.* at Order Point 1.

¹⁰ *Id.*

¹¹ *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*, Docket No. E,G002,008/M-21-761, Joint Petition at 8 (Oct. 29, 2021) (hereinafter “Current Docket”) (citing Minneapolis, Minn., Ordinance No. 2019-007, § 1 (Feb. 15, 2019)).

¹² Current Docket, Joint Petition, Attachment B at 1.

¹³ See *id.* at 8.

¹⁴ See *id.*; see also Current Docket, Joint Petition, Attachment B at 1.

¹⁵ Current Docket, Joint Petition, Attachment B at 1-2.

reduce energy burden through improved residential building stock.”¹⁶ The Ordinance is one part of the City’s recently adopted policies and it seeks to provide “renters upfront insight into total housing costs for a given building and incentivizes building owners to make energy upgrades that lower utility bills” by requiring “rental property owners [to] disclose energy cost information to prospective residential tenants at time of their rental application.”¹⁷ The Ordinance, which is a subsection of section 47.190 (“Commercial and multifamily residential building rating and disclosure”), states in full¹⁸ that:

- (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.

The City intends to implement the Ordinance in two phases: Phase 1 applies to residential apartment buildings with five or more units, and Phase 2 applies to one-to-four-unit rental homes and apartment buildings.¹⁹ Phase 1 has been in effect since September 2021, and allows landlords to access the Utilities’ “aggregated whole building energy use information” for purposes of the Ordinance, as long as the release of the data complies with the Commission’s past CEUD-related orders.²⁰

¹⁶ *Id.* at 1.

¹⁷ *Id.*

¹⁸ MINNEAPOLIS, MN., MINNEAPOLIS CODE OF ORDINANCES § 47.190(f) (2021), https://library.municode.com/mn/minneapolis/codes/code_of_ordinances?nodeId=COOR_TIT3AIPOENPR_CH47E_NAIPO_47.190COMUREBURADI (last visited Dec. 1, 2021).

¹⁹ See Current Docket, Joint Petition, Attachment B at 1-2.

²⁰ *Id.* at 8-9.

Phase 2 is the impetus for the Joint Petition since it involves apartment buildings with less than five units. Specifically, because the Commission’s past CEUD-related orders prohibit the Utilities’ disclosure of aggregated CEUD for rental properties with one-to-four units without customer consent, “to comply with the [City’s] 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.”²¹ Accordingly, Phase 2 implementation has been delayed by the City “pending a regulatory decision of a process to release CEUD without customer consent,” which is the subject of the Joint Petition.²²

While the plain text of the Ordinance demonstrates that the Commission’s CEUD-related Orders were not incorporated into the City’s codified policy, it did, to some extent, consider privacy issues during the legislative process.²³ Moreover, the City and the Utilities have considered privacy issues in implementing the Ordinance.

III. OVERVIEW OF THE UTILITIES’ JOINT PETITION

In compliance with the Commission’s past CEUD-related Orders, the Utilities “have developed processes to aggregate and anonymize CEUD from buildings with four or more account holders” and release such data without customer consent “for purposes of supporting benchmarking ordinances.”²⁴ “[T]he [City’s] Ordinance,” however, “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.”²⁵ Accordingly, the

²¹ *Id.* at 9.

²² *Id.*

²³ City’s Response to OAG IRs 1-3 (attached as Exhibit 1).

²⁴ Current Docket, Joint Petition at 2.

²⁵ *Id.* at 2.

City “asked the Utilities to assist in developing processes for property owners to access data on average energy usage” without obtaining customer consent.²⁶

Through the Joint Filing, the Utilities seek Commission approval to deploy a new process to assist owners in buildings with four units or less to comply with the Ordinance by releasing to the City 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.”²⁷ The Joint Petition provides a more technical explanation of how the Utilities’ confidence interval would allow the City to implement its Ordinance without compromising customers’ privacy:

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.²⁸

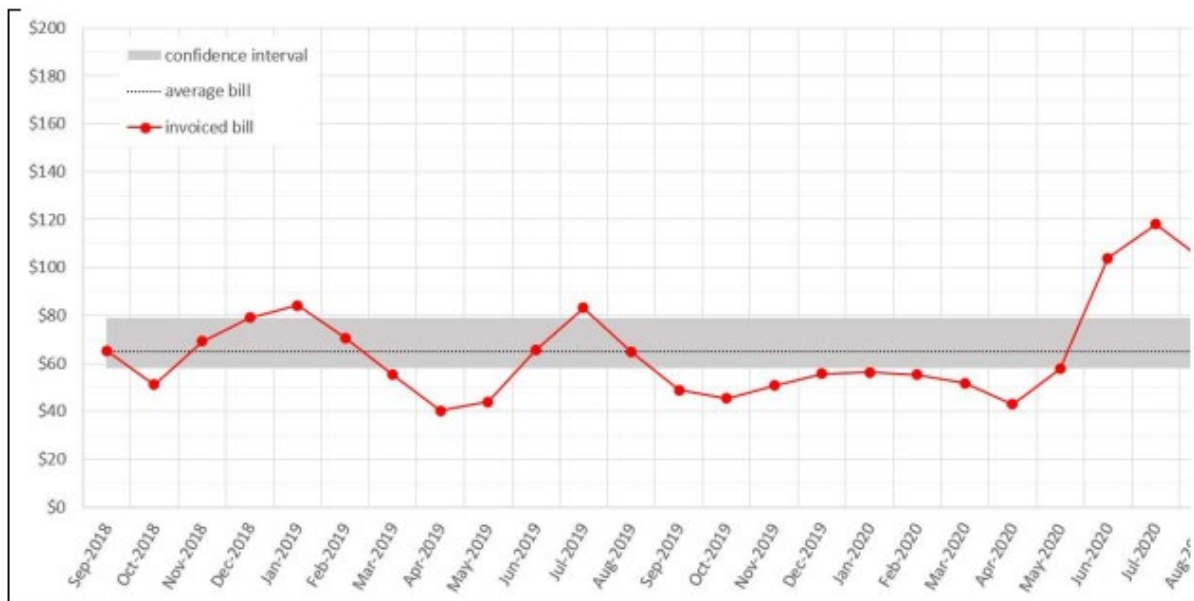
In short, the Utilities contend that they can assist the City in implementing the Ordinance while protecting customer privacy by taking 24 months of electrical or natural gas usage history at subject properties and applying a “statistically meaningful combination of both the average and its monthly variation” to develop a confidence interval—with high and low average monthly cost

²⁶ *Id.*

²⁷ *Id.* at 2-3.

²⁸ *Id.* at 3.

endpoints for each property—that is “representative of historical usage” without revealing either the simple average or the absolute low or high usage points.²⁹ As explained pictorially by the figure below,³⁰ the Utilities would apply the statistical methodology to the monthly invoiced bill amounts for one-to-four-unit buildings (reflected by red dots) to derive the confidence interval (reflected by the grey band) in which the precise average bill amount would be contained (reflected by the dashed black line):

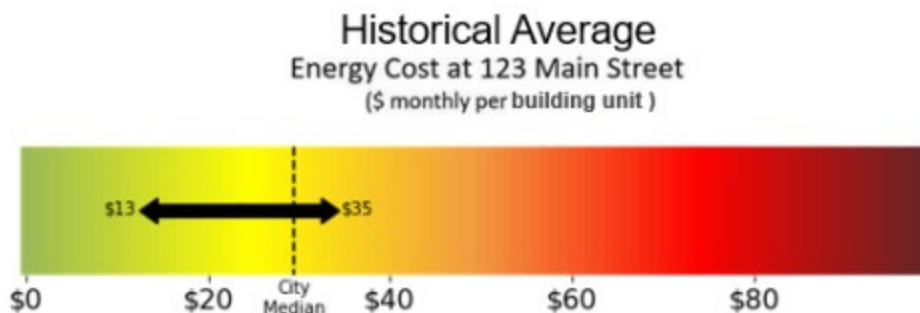


The Utilities intend to provide the City only with the confidence interval in a numerical range, and not the monthly invoiced bill amounts nor the average monthly bill information. In other words, prospective tenants in Minneapolis would be provided with property-specific energy use data that comprises a range of expected energy costs for most months, as reflected by the figure below.³¹

²⁹ *Id.* at 9-10.

³⁰ *Id.* at 11, Figure 1.

³¹ *Id.*, Attachment B at 2.



The Utilities also contend that the statistical confidence interval methodology alleviates privacy concerns for their customers for several reasons:

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. . . .

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 calculated from the reported interval.³²

³² Current Docket, Joint Petition at 10.

Put differently, the Utilities believe that this combination of factors adequately protects customer's data. While these steps alleviate many privacy concerns, the Commission should take additional steps to further protect the privacy of residential ratepayers.

ANALYSIS

IV. THE COMMISSION SHOULD CONSIDER WHETHER THE JOINT PETITION'S PROPOSED CONFIDENCE INTERVAL METHODOLOGY PROPERLY PROTECTS THE CEUD THAT WILL BE RELEASED TO THE CITY.

A threshold question for the Commission to consider is whether the Utilities' disclosure of "Monthly Energy Use Information" to the City using confidence intervals results in the disclosure of CEUD. The Commission has 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."³³ "Monthly Energy Use Information," on the other hand, has been defined by the City as "the average amount of electrical and natural gas energy paid for by a rental building tenant each month, either directly or through a rental utility billing system or similar arrangement, and the cost of that energy, as provided by the electrical and natural gas utilities."³⁴

The Commission's definition of CEUD combined with its November 20, 2020 Order clearly forbids the Utilities from disclosing to the City the quantity of natural gas or electric used by their customers that reside in one-to-four-unit buildings unless the Utilities obtain customer consent. The Monthly Energy Use Information technically constitutes CEUD because it *de facto* discloses information about the quantity, quality, or timing of customers' natural gas or electric use. Accordingly, the question for the Commission becomes whether the Utilities confidence interval methodology adequately protects customer privacy such that customer consent is no longer needed.

³³ 2017 CEUD Order, Order Point 1.

³⁴ See Current Docket, Notice of Comment Period at 2-3 n.3 (citing and quoting Mpls. Ordinance 47.190).

Because the Utilities' confidence interval methodology discloses CEUD to the City, the Commission should be mindful of the privacy concerns created by the Joint Petition as discussed in greater detail below.

A. The Commission Must Assess Whether the Utilities' Proposed Confidence Interval Methodology Adequately Protects both Customer Identity and Customer CEUD as Required by the Open Data Access Standards.

To comply with its own CEUD orders, the Commission must assess whether the Utilities' proposed confidence interval methodology adequately protects both customer identity and customer CEUD. This section explores those two questions.

Regarding protecting customer identity, the OAG understands that the Utilities will not provide the City with the identity of any customer(s) when complying with the Ordinance. Instead, the Utilities will provide the City with confidence interval data by property address. Nonetheless, given the near-ubiquitous availability of the Internet and advancements in information technology services, it is conceivable that a third party could determine an individual tenant's identity by using the address provided to the City. That said, this address-used-to-determine-identity problem exists independent of the Joint Petition, as any third party could use public address information to determine the individual identities of a building's tenants irrespective of the how the Utilities anonymize customer identity data when complying with the City's Ordinance.

Regarding protecting customer CEUD, it is reasonable to conclude that the Utilities confidence interval data does not disclose real-time, customer CEUD that reveals precise monthly usage fluctuations to the City. Rather, the Utilities are providing a range of averaged per-month energy costs based on two years' worth of historical energy use. On the other hand, it is equally reasonable to conclude that since CEUD—i.e., the Utilities' customers' monthly average quantity of energy usage based on historical data—serves as the basis for the confidence interval cost ranges

provided to the City, the Utilities’ proposed confidence interval methodology deserves increased scrutiny to ensure that it does not violate customer privacy. This is the subject of the next section.

B. The Commission Should Confirm that the Utilities’ Confidence Interval Methodology Adequately Protects Consumer Privacy or Modify It to Offer Greater Privacy Protections.

The Joint Petition provides a detailed discussion of why the Utilities’ chose confidence interval methodology to protect customer privacy. Specifically, and as discussed more fully in the Background Section,³⁵ the Utilities contend that the following aspects of the methodology will protect against the disclosure of CEUD when the Utilities provide the City with customer data in compliance with the Ordinance: random rounding;³⁶ modified CEUD energy usage averages;³⁷ the absence of precise monthly energy usage data that includes seasonal variations due to heating, cooling, and lighting demands;³⁸ and sample size differences in energy billing.³⁹

The Utilities further contend in the Joint Petition that even if CEUD—i.e., the Utilities’ customers’ actual monthly average quantity of energy usage—is contained within the confidence interval range provided to the City, there is no potential for “back-calculation” as described below:

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

³⁵ See *infra* Background, Section III.

³⁶ See Current Docket, Joint Petition at 3 (“[t]he 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.”).

³⁷ See *id.* at 9-10 (“[t]he 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 containing, but not identifying, the actual sample average.”).

³⁸ See *id.* at 10 (“[c]ustomer 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.”).

³⁹ See *id.* at 10 (“[c]onfidence 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.”).

sample variance will be too small to create a sufficiently wide range of values. Intervals for these rare cases cannot be reported.⁴⁰

After a review of the Joint Petition, the Commission should take the following actions to increase CEUD protection for the Utilities' customers:

- Direct the Utilities and the City to explore whether the Utilities could still meaningfully comply with Ordinance implementation while further protecting customers' privacy interests by disclosing to the City a 97% or 99% confidence interval instead of the proposed "95% confidence interval around the parameter of average monthly energy use."⁴¹
- Prevent the Utilities from disclosing confidence intervals for single-unit rental properties. This is principally because the disclosure of confidence intervals for single-unit rental properties lacks the inherent privacy protections afforded by aggregated data for two-to-four-unit rental properties.
- Prevent the Utilities from disclosing confidence intervals for three-to-four-unit rental properties where a single tenant is responsible for more than fifty percent of the electric or natural gas usage.

The majority of the OAG's privacy concerns do not arise from the Utilities' proposed confidence interval methodology, but instead from how the City plans to use that data to implement the Ordinance. These concerns are discussed in the next section.

C. The Commission Should Confirm that the City's Proposed Data Management Process Is Sufficient.

The OAG's biggest concern with the Joint Petition is the City's treatment of the confidence interval data that it obtains from the Utilities pursuant to the Ordinance. As written, the Ordinance simply requires the City to ensure that one-to-four-unit rental property owners "disclose [monthly average] energy use information to residential tenants at the time of application if an application is provided."⁴² If an application is not provided by the property owner to the prospective tenant, the Ordinance requires that the monthly average "energy use information shall be posted in the

⁴⁰ *Id.* at 10 n.20.

⁴¹ *Id.* at 3.

⁴² Current Docket, Joint Petition at 8 (citing and quoting Ordinance).

rental property”⁴³ Both of these options achieve the City’s goal of “provid[ing] renters with address-specific energy cost information and allow[ing] for comparison between housing options.”⁴⁴

If the City goes beyond what is required by the Ordinance and creates a public-facing website that will be accessible by the public at large as well as prospective tenants, then this will create additional privacy concerns.⁴⁵ By not limiting access to monthly average energy use information solely to prospective tenants, the City’s proposed implementation of the Ordinance would permit anyone—including potentially fraudulent third party solicitors—to view and compare confidence interval data for one-to-four-unit rental properties in Minneapolis. While the City may have public interest reasons for implementing the Ordinance—for example, to provide “upfront insight into total housing costs for a given building and incentivizes building owners to make energy upgrades that lower utility bills”⁴⁶—how the City implements the Ordinance has the potential to negatively impact privacy.

There are several examples of potential privacy concerns that may be triggered by the City’s use of confidence interval data provided to it pursuant to the Ordinance. First, individuals other than prospective tenants would have the ability to gain insight into a friend’s, co-worker’s, neighbor’s, or potential customer-target’s average estimated monthly energy outlay in a dollar range. This raises a myriad of privacy concerns. For example, fraudulent or nefarious third parties could intentionally target high-energy-use addresses with unwanted solicitations on how to reduce energy costs. Additionally, curious individuals could assess how much energy individual tenants use on an approximate monthly basis and use that information to their detriment.

⁴³ *Id.* at 8 (citing and quoting Ordinance).

⁴⁴ *Id.*, Attachment B at 1-2.

⁴⁵ *See id.*, Attachment B.

⁴⁶ *Id.*, Attachment B at 1.

After a review of the City's planned implementation of the Ordinance, the OAG recommends that the Commission take the following actions to increase CEUD protection for the Utilities' customers:

- Prohibit the Utilities from disclosing confidence interval information to the City unless the municipality agrees to use that information within the confines of the as-written Ordinance, i.e., by providing the information to prospective tenants or posting it in two-to-four-unit rental properties.
- If the City plans to provide confidence interval data to prospective tenants via a website, the Commission should mandate that the website not be public facing. Rather, it should only be accessible by unique passwords and usernames provided to prospective tenants.

CONCLUSION

The Commission should consider the CEUD concerns and corresponding recommendations discussed in these Initial Comments when considering whether the Joint Petition furthers the public interest. The Commission should adopt the OAG's proposed CEUD protections to reduce the likelihood that third parties can manipulate the confidence interval data to re-identify customers or use customers' average monthly energy use data for nefarious purposes.

Dated: December 8, 2021

Respectfully submitted,

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December 1, 2021

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

In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards
Docket No. 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
Docket No. E,G002,008/M-21-761

Dear Mr. Kieley:

Thank you for your office's November 17, 2021 *Office of the Attorney General—Residential Utilities Division's Information Request numbers 001 - 003* in the above-entitled matters. We appreciate your interest in the City's time-of-rent disclosure policy ("Ordinance") and gladly provide the following information you have requested.

“When drafting the Ordinance, did the City consider the Commission’s January 19, 2017 Order regarding CEUD in Docket No. E,G999/CI-12-1344 whereby the Commission prohibited utilities from releasing 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? If so, please provide a narrative explanation.”

Yes, the City was aware of and did consider this specific Commission Order regarding CEUD. City staff and policy makers spent time considering the Commission Order's impact on the Ordinance during the drafting and approval process. The City also did extensive engagement with many stakeholders leading up to Ordinance adoption, and the topic of CEUD came up in conversations, including with Xcel Energy and CenterPoint Energy ("the Utilities"). In particular, the City and the Utilities have discussed how the Utilities interpret and comply with the requirements of the PUC's Order, given that the Order left the utilities with some discretion in implementation.

After these conversations with the Utilities and many other stakeholders, the City felt confident to proceed with Ordinance adoption. The City felt at the time that implementation of the policy in 2021 would be successful given that the Commission's definition of CEUD was not exhaustive, that

the utilities retained latitude in creating policy (such as aggregation thresholds, at that time) to comply with the Order, and the City had created a two-year “runway” between ordinance adoption and implementation to finetune the data-specific requirements for compliance.

Is there any legislative history (committee recordings, notes, etc.) demonstrating that the City otherwise considered privacy concerns when drafting the Ordinance? If so, please provide such documents in addition to providing a narrative response.”

There is a substantial [legislative history](#) regarding the Ordinance available for public review, spanning from the Ordinance’s introduction in late 2018, to public hearings and ordinance adoption in early 2019, to a recent update regarding implementation in 2021. In particular, the most substantive, recorded conversations occurred at a February 4, 2019 meeting of the *Public Health, Environment, Civil Rights, and Engagement Committee*, which featured an [Ordinance overview presentation](#) by Sustainability Director Kim Havey, a substantial public hearing with public comments, and deliberations by the Committee members (see [meeting video](#) starting at 5:54 and ending at 1:58:25). The Ordinance was officially adopted by the full City Council at their meeting on February 15, 2019, where additional amendments were adopted and council members concluded their deliberations (see [meeting video](#) starting at 23:38 and ending at 30:40). The most recent conversation before the Council was on September 9, 2021 when an [implementation update was presented](#) by staff to the *Policy & Government Oversight Committee* (see [meeting video](#) starting at 53:10 and ending at 1:22:15).

Pertaining most directly to consideration of data privacy during the drafting and implementation of the Ordinance, Council Member Fletcher on several occasions commented regarding this subject at public Board meetings of the Minneapolis Clean Energy Partnership (CEP). The following statements were recorded in the adopted meeting minutes of two Board meetings:

2019 Q4 CEP Board Meeting (November 14, 2019)

“Council Member Fletcher stated that he is not in favor of property owners getting to the level of granularity where they could see a monthly bill for an individual renter and use that information to attempt to modify behavior. He believes monthly data usage granularity could be an intrusion in terms of data privacy and that aggregating over time is better because it would protect privacy and still provide energy data. Emma explained that CenterPoint Energy’s comments are supportive of the public interest goal for data access, but it also does not want retaliation against the customer by a landlord that has access to data. Luke added that the City has had conversations with CenterPoint Energy on this issue. The City and CenterPoint Energy feel that asking the PUC to recognize property owners as unique third parties for many different reasons could be balanced by stipulations to ensure that the information will not be used in a retaliatory manner.”
([Meeting Minutes](#) – page 7)

2021 Q1 CEP Board Meeting (February 9, 2021)

“CM Fletcher: I expressed concerns over data privacy in the past and I want to clarify what this means and doesn’t mean because I don’t like Xcel’s solution because I don’t want customers to consent to giving too much data. I like the solution that we’ve come to: to aggregate across time if you can’t aggregate across multiple units. So property owners cannot get access to month to month data that shows minute changes that might be revealing of personal practices or habits that should be free from intrusion. I don’t want to be given the choice as a tenant to be giving all of my information or not participating in this program. I don’t think giving consent that gives the landlord access to the full data meets the needs of what we proposed, which aggregates the data in the way that inhibits a person giving too many insights while simultaneously revealing data to get to people so

they think about energy efficiency. I ask Xcel Energy to reconsider this because it's so important and I think we have a solution that allows everyone to participate in a way that is not intrusive. We solved data privacy issues to my satisfaction." ([Meeting Minutes](#) – pages 4-5)

The meeting minutes from other CEP quarterly Board meetings over the last three years also document broader discussions of the City's Ordinance, the PUC ruling, and the Utilities' interpretations and implementations. Meeting minutes can be reviewed further in the [Board meeting materials](#) posted publicly at the CEP webpage.

“Reference: Petition at 8 (“According to the City of Minneapolis . . . 87% of rental properties are one-to-four unit buildings.”)

What percentage of the City’s rental properties are classified as single unit rentals? How many single unit rentals are there in the City?

What percentage of the City’s rental properties are classified as 2-unit rentals? How many 2-unit rentals are there in the City?

What percentage of the City’s rental properties are classified as 3-unit rentals? How many 3-unit rentals are there in the City?

What percentage of the City’s rental properties are classified as 4-unit rentals? How many 4-unit rentals are there in the City?”

Information from City systems regarding active rental licenses was most recently analyzed on November 29, 2021, more current than what was relayed in Utilities’ joint petition. Rental license information and counts change daily as individual licenses are added to the system or expire. At this time, two categories of rental license are exempt from compliance with the policy: rental condominium units (3,055 rental licenses) and buildings with less than two years of occupancy (123 rental licenses); they are excluded from the table below.

Building Category	Number of Properties	Number of Units	Share of Total Properties	Share of Total Units
Single Unit Rental	7,367	7,768	38.2%	8.5%
2-Unit Rental	7,944	13,647	41.2%	15.0%
3-Unit Rental	583	1,700	3.0%	1.9%
4-Unit Rental	1,065	4,436	5.5%	4.9%
Apartment Building (5 or More Units and less than 50,000 square feet)	2,030	31,426	10.5%	34.5%
Apartment Building (50,000 square feet or greater)	315	31,998	1.6%	35.2%
Total	22,482	90,975	-	-

Minneapolis thanks the Office of the Attorney General for consideration of our reply, and we are available to respond to any further questions you may have.

Sincerely,

Luke Hollenkamp

Division of Sustainability

612-673-2349

Luke.Hollenkamp@minneapolismn.gov



The Office of
Minnesota Attorney General Keith Ellison
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December 8, 2021

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

Re: *In the Matter of a Commission Inquiry Into Privacy Policies of Rate-Regulated Energy Utilities*
MPUC Docket No. E,G999/CI-12-1344

In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards
MPUC Docket No. 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
MPUC Docket No. E,G002,008/M-21-761

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Initial Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ **Joseph C. Meyer**

JOSEPH C. MEYER

Manager, Residential Utilities Division

Assistant Attorney General

(651) 757-1433 (Voice)

(651) 296-9663 (Fax)

joseph.meyer@ag.state.mn.us

CERTIFICATE OF SERVICE

Re: *In the Matter of a Commission Inquiry Into Privacy Policies of Rate-Regulated Energy Utilities*
MPUC Docket No. E,G999/CI-12-1344

In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards
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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
MPUC Docket No. E,G002,008/M-21-761

I, DEB POOLE, hereby certify that on the 8th day of December, 2021, I e-filed with eDockets *Initial Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Deb Poole

DEB POOLE

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
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_12-1344_Official
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	bev0022@umn.edu		4001 Grand Ave South # 3 Minneapolis, MN 55409	Electronic Service	No	OFF_SL_12-1344_Official
Nichol	Beckstrand	Nichol.beckstrand@mmha.com	Minnesota Multi Housing Association	1600 W 82nd St Ste 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_12-1344_Official
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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Annika	Brindel	abrindel@nhtinc.org	National Housing Trust	1101 30th Street NW Ste 100A Washington, DC 20007	Electronic Service	No	OFF_SL_12-1344_Official
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_12-1344_Official
Richard	Carter	rick.carter@ihbcorp.com		2780 Shadywood Rd Excelsior, MN 55331-9599	Electronic Service	No	OFF_SL_12-1344_Official
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
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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
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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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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@eg.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 55102131	Electronic Service	Yes	OFF_SL_12-1344_Official
Richard	Saveikoul	rsaveikoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	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_19-505_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_19-505_Official
Kevin	Marquardt	Kevin.Marquardt@CenterPointEnergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
J.B.	Matthews	N/A	Cushman & Wakefield/NorthMarq	3500 American Blvd W - #200 Minneapolis, MN 55431	Paper Service	No	OFF_SL_19-505_Official

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Greg	Palmer	gpalm@greaternmgas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-505_Official
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
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_19-505_Official
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Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-761_M-21-761
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_21-761_M-21-761
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_21-761_M-21-761
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Jon	Braman	jbaraman@brightpower.com	Bright Power, Inc.	11 Hanover Square, 21st floor New York, NY 10005	Electronic Service	No	OFF_SL_21-761_M-21-761
Sheri	Brezinka	sbrezinka@usgbc.org	USGBC-Minnesota Chapter	701 Washington Ave. N Suite 200 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-761_M-21-761
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-761_M-21-761
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_21-761_M-21-761
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