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January 19, 2022

–Via Electronic Filing–

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

RE: REPLY COMMENTS
PROCESS TO RELEASE WHOLE BUILDING DATA TO FACILITATE LOCAL
RESIDENTIAL RENTAL ORDINANCE COMPLIANCE
DOCKET NO. E002,G008/M-21-761

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 these Reply Comments in response to the December 8, 2021 Comments of the Minnesota Department of Commerce (Department) the Minnesota Office of the Attorney General (OAG), Citizens Utility Board (CUB) and Fresh Energy (FE) in the above-referenced docket.

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)

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Sincerely,

/s/

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XCEL ENERGY

/s/

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c: Service List

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 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. E002,G008/M-21-761

REPLY COMMENTS

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) these Reply Comments in response to the December 8, 2021 Comments of the Minnesota Department of Commerce (Department), the Minnesota Office of the Attorney General (OAG), Citizens Utility Board (CUB) and Fresh Energy (FE) in the above-referenced docket.

On October 29, 2021, the Utilities filed with the Commission a Joint Petition for approval for a process to release whole building data to facilitate local residential rental ordinance compliance.

On November 16, 2021, Commission staff issued a Notice of Comment Period setting forth four questions. Those questions are as follows:

- 1) Does the Utilities' proposed confidence interval method fulfill the City of Minneapolis' ordinance requiring disclosure of monthly energy use data while

protecting utility customers' identity and energy data as required by the Commission's Open Data Access Standards? If not, what other method might be appropriate?

- 2) If using the Utilities' proposed confidence interval method, does the method adequately protect consumer privacy? If not, how might the method be modified to offer greater privacy protections?
- 3) Is the proposed data management process sufficient? If not, what information is needed?
- 4) Are there other issues or concerns related to this matter?

REPLY COMMENTS

The Utilities appreciate the thoughtful Comments submitted by the parties and their general support for this process. This Reply responds to the Comments submitted by the Department, OAG, CUB, and FE. The OAG's Comments also included inquiries and recommendations specific to how the City of Minneapolis should manage the data provided from the Utilities; the City will address those issues separately in their Reply Comments.

Department of Commerce

We agree with the Department's representation of the established process of data transfer between the Utilities and the City of Minneapolis. Although the data includes addresses, the Utilities do not consider this Personally Identifiable Information (PII), because it is public knowledge that Xcel Energy and CenterPoint Energy provide electric and natural gas service, respectively, to the City residences. As for the Customer Energy Usage Data (CEUD), through use of the confidence interval methodology, the Utilities are adequately protecting the anonymity of the CEUD in accordance with the Commission's requirements regarding disclosure of CEUD.¹ Therefore, it is not necessary to establish a secure online platform to transfer the data.

The Department made two modification recommendations. The first modification recommendation is to utilize the Conservation Improvement Program (CIP) in matching addresses to the City's records. Customer addresses used in the CIP

¹ See ORDER GOVERNING DISCLOSURE OF CUSTOMER ENERGY USE DATA TO THIRD PARTIES, REQUIRING FILING OF PRIVACY POLICIES AND COST DATA, AND SOLICITING COMMENT, Order Point No. 2, Docket No. E,G999/CI-12-1344 (January 19, 2017).

program are the customer of record; the same customer of record process is used to match the 17,000 property addresses the City has sent. As noted in the Utilities' Petition, while we have identified and matched the majority of the two data sets, we will continue to refine the process to increase matches. For those properties we cannot match, a manual customer data release form will be required. With regard to the Department's second modification recommendation, the Utilities will gladly make accessible any data the Department and the Commission need for their review.

Lastly, if the Commission approves our requested process to release whole building data, the Utilities agree to file an update on the program in our annual data privacy compliance report under Docket Nos. E,G999/M-19-505 and. E,G999/CI-12-1344.

Office of the Attorney General

The OAG made three recommendations for consideration in its Comments.

1. 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."

As illustrated in Figures 1, 2, and 3 below, the higher the confidence interval employed, the larger the band which results in greater anonymity. However, because the Utilities round the end point of the confidence intervals, using a 97% or 99% confidence interval will reflect a minimal change (\$1-\$2) in the historical energy cost use of that whole building. The Utilities believe the proposed 95% confidence interval generally represents the correct balance between providing meaningful information and protecting customer privacy.

The additional rounding of confidence interval end points will result in slightly different effective confidence levels for each building. We have proposed using close to the same confidence level, starting with 95%, for all customers to establish comparability with small differences due to the rounding. Using nearly the same confidence level for all customers is important because it will establish a common interpretation for comparisons.

However, to ensure the Utilities are adequately protecting customer data, each year we will: 1) analyze all properties, using the entire data set of properties sent to us by the City for the confidence interval analysis; and 2) after establishing an appropriate level of confidence, the interval endpoints will be rounded to whole number dollar values by randomly selected small integers to further decrease the ability to back calculate a

sample mean of the whole buildings energy usage; 3) start at a 95% baseline and perform an analysis to determine if that level adequately protects customer data. If not, we may need to adjust to a higher confidence interval level such as 97% or 99%. It is not possible to determine what a sufficient minimum future confidence interval should be.

Figure 1: 95.0% Confidence Interval

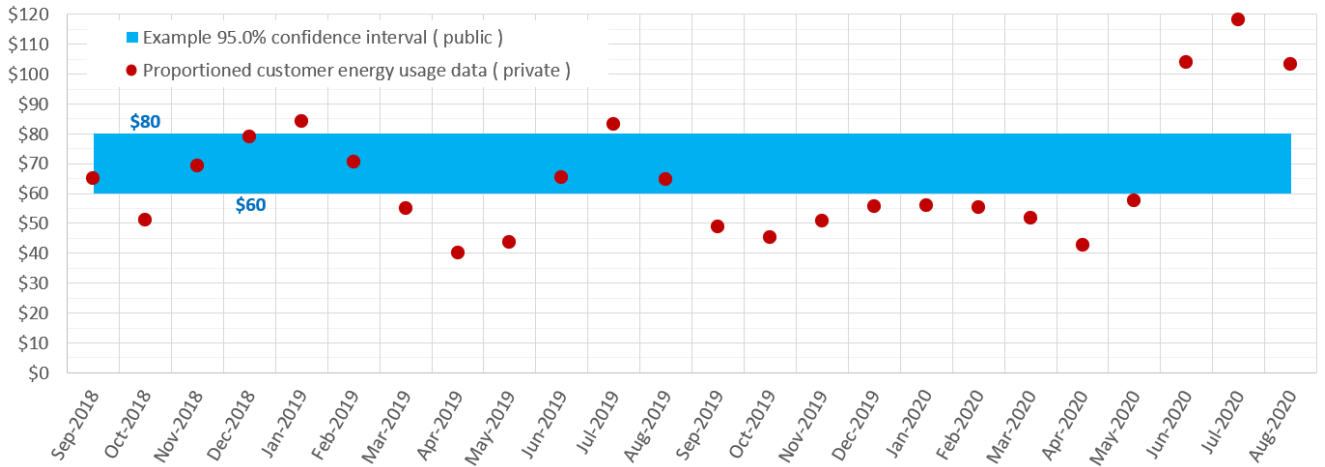


Figure 2: 97.0% Confidence Interval

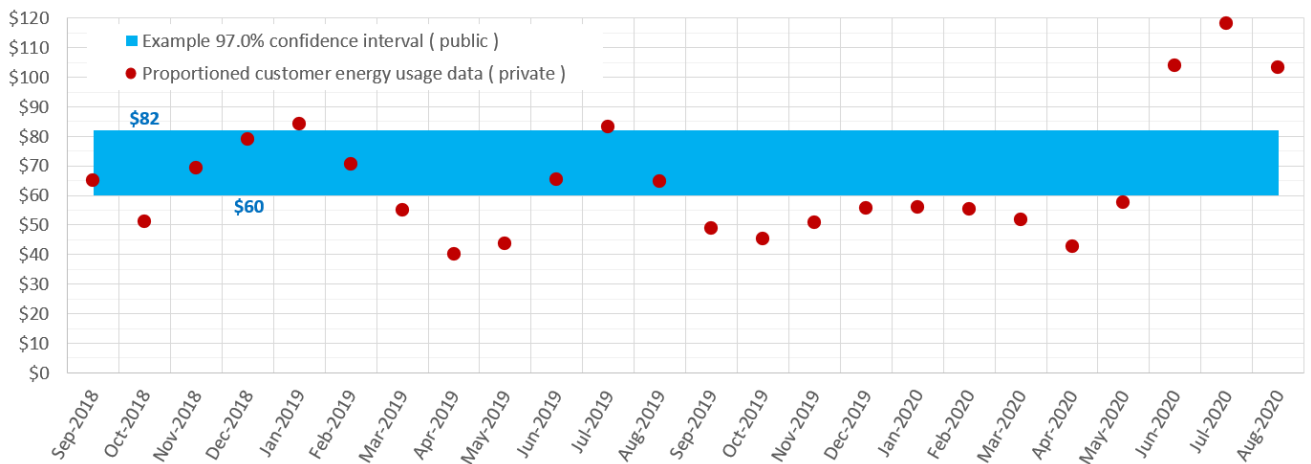
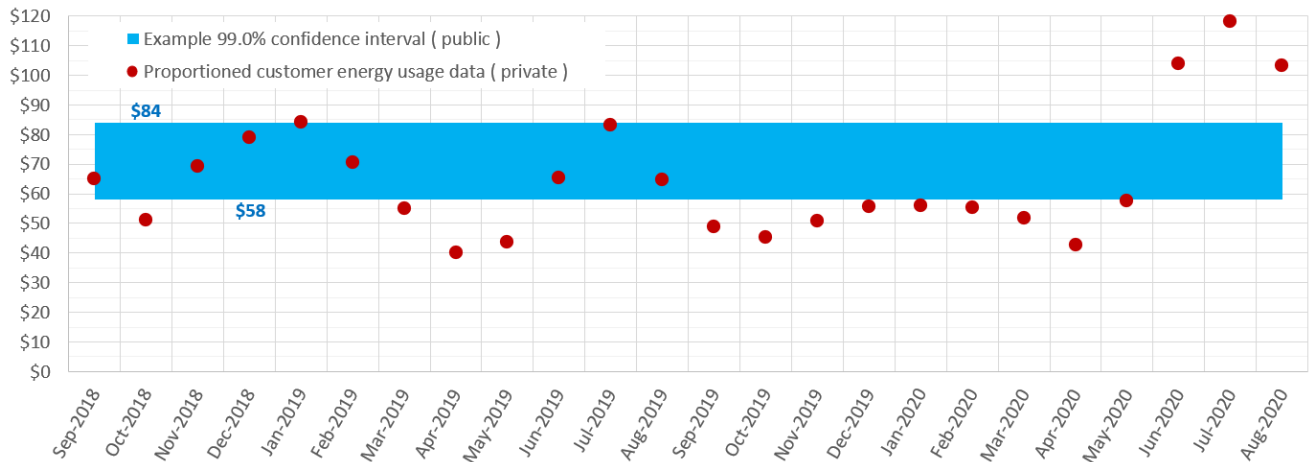


Figure 3: 99.0% Confidence Interval



2. 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.

The Utilities believe our proposal is consistent with the Commission’s customer data privacy framework. Ultimately, any release of customer data must balance the privacy interests of utility customers and the public policy benefits of releasing the data. The Utilities continue to believe that the proposed process adequately protects the privacy of individual customers. First, the data for single-unit rentals includes all customers who have received utility service at that address in the past 24 months. Second, the confidence interval methodology serves to obscure the actual usage, while at the same time providing an useful information for a potential renter. For these reasons, the Utilities believe it is reasonable for the data to be released to achieve the public policy objectives of the City’s Time of Rent ordinance.

3. 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 Utilities believe that the proposed process adequately protects the privacy of individual customers because it provides a confidence interval, adding random endpoints for a whole-building and does not provide any individual customers’ exact or average energy usage.

That said, if the Commission determines that customer consent is needed in cases

where a three or four unit rental property uses more than 50 percent of the electric or natural gas usage, the Utilities would require the landlord or building owner to obtain customer consent forms prior to calculating confidence intervals for that property.

The Utilities understand the OAG will recommend in its Reply Comments that if the Commission approves the Utilities proposed CI methodology, approval should be limited to the City of Minneapolis as it pertains to their ordinance and not be added as an approved whole building use case option for CEUD. Additionally, we understand the OAG will recommend each municipality be considered on a case by case basis. The Utilities respect the OAG's position but continue to believe the CI methodology should be approved as proposed, and could be used to aid similar objectives for other local governments. If a local government enacts a similar ordinance and does not choose to follow the same CI output methodology, the Utilities will submit a petition to the Commission for an alternative proposal at that time as appropriate.

Citizens Utility Board

The Citizens Utility Board (CUB) acknowledges two important factors that were critical to the Utilities and the City of Minneapolis' collaboration in finding a solution to meet the City's Time of Rent Ordinance. First, create a process for compliance by building owners that is not onerous and second, the proposed confidence interval methodology for 1-4 units may encourage building owners to participate in the utilities energy conservation programs, decreasing tenants' energy use and price burden. The Utilities appreciate CUB's support of our proposal.

Fresh Energy

The Utilities also appreciate Fresh Energy's support of our proposed Confidence Interval methodology in use for many whole building CEUD applications. We agree this methodology offers a cost-effective approach to providing anonymized results based on historical usage information.

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: January 19, 2022

Northern States Power Company and CenterPoint Energy

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. E002,G008/CI-21-761

Dated this 19th day of January 2022

/s/

Mustafa Adam
Regulatory Administrator

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