

March 4, 2024

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

RE: **Comments of the Minnesota Department of Commerce**
Docket Nos. E,G999/M-19-505 and E,G999/CI-12-1344

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce (Department), in the following matters:

- A Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards (E,G999/M-19-505), and
- A Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities (E,G999/CI-12-1344).

On December 1, 2023, Public Utilities Commission issued a notice of comment in these dockets. The Department responds with these comments.

Sincerely,

/s/ LOUISE MILTICH
Assistant Commissioner of Regulatory Analysis

LM/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket Nos. E,G999/M-19-505 and E,G999/CI-12-1344

I. INTRODUCTION

On December 1, 2023, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment period requesting comments in Docket Nos. E,G999/M-19-505 and E,G999/CI-12-1344. The Commission asked for comment on further refinement of the Open Data Access Standards (ODAS or Standards) policies on the release of anonymized customer energy use data (CEUD). The Commission also asked for comment on the need to retain the 5 megawatt (MW) exemption Standard, given the incorporation of statutory exemptions in Section III.E. of the Standards.

II. DEPARTMENT ANALYSIS

A. BACKGROUND

1. November 20, 2020 Order

On November 20, 2020, in Docket Nos. E,G0999/M-19-505 and E,G-999/CI-12-1344 the Commission issued an Order adopting Open Data Access Standards¹ (ODAS or Standards) for the collection and sharing of customer energy use data (CEUD)² for use by third parties,³ and establishing further proceedings.⁴ The Commission approved the Standards as attached to the Order and stated that, at that time, the Commission would apply the Standards only to whole building aggregated CEUD for building owners and benchmarking purposes. As such, the Standards approved in the November 20, 2020 Order did not include anonymized data, did not apply to geographical levels beyond the building-level, and did not permit the release of data to parties other than building owners or those using the data for benchmarking. Further, the Standards did not apply to commercial and industrial (C&I) customers with peak demands greater than 5 megawatts (MW).

¹ The standards apply to investor-owned electric or gas public utilities with greater than 50,000 customers within the state of Minnesota. The standards are designed to ensure that: (1) third parties may access aggregated or anonymized, disaggregated CEUD; (2) the data be identified at the closest level of geographical specificity possible to maintain customer anonymity and at the finest practicable time interval; (3) the utility, to the best of its ability, shall in a timely manner furnish this data in a consistent, standard format aligned with industry best practices regarding ease of access and granularity of data; and (4) unless authorized by a customer, a third party shall not have access to any personally identifiable information for a customer.

² The updated Standards (per the March 13, 2023 Order) define “customer energy use data” as data collected from the utility customer meters that reflect the quantity, quality, or timing of customers’ natural gas or electric usage or electricity production, including data regarding: (1) the amount and timing of energy use and production; (2) peak load contributions and the amount and timing of demand; and (3) rate class.

³ The updated Standards define “third party” as a person or entity who requests CEUD other than their own from the utility that maintains the data.

⁴ See Commission’s November 20, 2020 Order Adopting Open Data Access Standards and Establishing Further Proceedings in Docket Nos. E,G-999/M-19-505 and E,G-999/M-12-1344, Accession No. [202011-168476-01](#).

2. March 13, 2023 Order

On March 13, 2023, after further record development, the Commission issued an Order in the same dockets, refining the Standards as reflected in the Order and an updated version of the Standards.⁵ The Order expanded the application of the aggregated data Standards beyond building-level to larger geographic areas, and although the Commission amended certain provisions regarding anonymized data, it continued to apply the Standards to aggregated—not anonymized—data requests. In addition, the Commission removed the blanket exemption for C&I customers with peak demands over 5 MW. The Commission retained the exemption for:

- aggregated⁶ building-level CEUD (defined as the data of individual customers located in a defined building, which is combined into one collective data point per time interval), and;
- anonymized CEUD (defined as the data of individual customers, which has been modified sufficiently to prevent the release of personally identifiable information, collected over a number of time intervals from a defined geographical area datasets).

The Commission removed the exemption for other aggregated⁷ CEUD data sets,⁸ such as community-level CEUD. As explained in the March 13, 2023 Order, the Commission found that the record did not support continuing to exempt C&I customers with peak demands over 5 MW from the Standards in all use cases.⁹ The Department notes that the updated Standards do not make specific reference to the large-C&I exemption, but rather the updated exemption is contained in the March 13, 2023 Order.

On March 31, 2023, the Minnesota Large Industrial Group (MLIG) filed a petition requesting the Commission reconsider the March 13, 2023 Order. Specifically, MLIG requested the Commission reverse its decision to remove the blanket exemption for C&I customers with peak demands greater than 5 MW.

⁵ See Commission's March 13, 2023 Order Refining Open Data Access Standards in Docket Nos. E,G-999/M-19-505 and E,G-999/M-12-1344, Accession No. [20233-193874-01](#).

⁶ The updated Standards define "aggregated customer energy use data" as the data of individual customers located in a defined geographical area, which is combined into one collective data point per time interval.

⁷ The updated Standards state that aggregated CEUD may be requested by: (a) tax-exempt organizations based within the United States; (b) U.S. Federal Government agencies and subdivisions thereof; State of Minnesota government agencies, boards, and/or commissions; regional or local government entities with jurisdiction within Minnesota; and government entities of federally recognized tribes that share Minnesota's geography; and (c) property owners or managers, so long as the CEUD requested applies only to the property the requestor owns or manages.

⁸ The updated Standards state that a utility must prepare and make available aggregated and/or anonymized CEUD upon the written or electronic request of any qualifying third party.

⁹ Aggregated CEUD data sets must abide by several requirements, such as having at least four customers and that a single customer's energy use must not constitute more than 50% of total energy consumption for the requested data set. However, individual customer CEUD that is publicly reported must be included in aggregated data sets, regardless of whether the customer's usage triggers a failure of the aggregation standard, so long as the time scale of the requested data set and the public data set are equivalent. In addition, a utility may refuse to provide aggregated or anonymized CEUD when it reasonably believes the data release would create a security risk for the utility, its customer(s), or the public, or that the release would allow the third party to re-identify customers.

On May 18, 2023, the Commission issued an Order denying MLIG's petition for reconsideration.

3. August 1, 2023 Order

On August 1, 2023, the Commission issued an Order in these same dockets incorporating newly-enacted Minnesota Statutes that maintain an exemption for certain large C&I customers.¹⁰ The Commission's Order¹¹ updated the Open Data Access Standards to include the exemption required by Minn. Stat. § 216C.331, as follows:

III.E. Notwithstanding any other provisions in law or in these Standards, a utility shall not aggregate or anonymize customer energy use data of any customer exempted by the commissioner of commerce under section 216B.241 from contributing to investments and expenditures made by a utility under an energy and conservation optimization plan, unless the customer provides written consent to the utility, pursuant to Minn. Stat. § 216C.331, subd. 8(d).

B. TOPICS FOR COMMENT

The current comment period primarily addresses anonymized data. However, the Commission also requested comments on the need to retain the 5 MW C&I exemption, given the incorporation of Minn. Stat. § 216C.331 into Standard III.E. The Department provides the following feedback in response to the Commission's questions.

- 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?*

The Department is aware of use cases where access to anonymized CEUD would further public interest and policy goals. For example, researchers wanting to understand customer usage patterns and profiles often prefer to use the anonymized data of multiple individual customers as opposed to aggregated data. In this proceeding, University of Minnesota researchers cited a number of studies that used anonymized data.¹² The outcomes of these studies included: identifying areas of high and low consumption to better target programs, policies, and grid planning; consumption pattern differences due to income, race, and ethnicity; the differences in studying marginal versus average emissions; and consumption changes during COVID.

¹⁰ On May 24, 2023, Minnesota Governor Tim Walz signed into law House File 2310, which among other things enacted [Minn. Stat. § 216C.331. Subdivision 8, paragraph \(d\).](#)

¹¹ See Commission's August 1, 2023 Order Amending Data Access Standards in Docket Nos. E,G-999/M-19-505 and E,G-999/M-12-1344, Accession No. [20238-197930-01](#).

¹² See Comments submitted on September 6, 2022 by Gabriel Chan, Elise Harrington, Sarah Komoroski, and Anna Giesting in Docket Nos. E,G-999/M-19-505 and E,G-999/CI-12-1344, Accession No. [20229-188876-01](#).

In addition to academic research, the Department is aware of use cases in which organizations wanting to implement certain energy programs will benefit from access to anonymized data. For example, when designing efficiency programs, an entity may use this data to compare multiple households in one neighborhood to another neighborhood to improve program design. In this instance, anonymized data of multiple individual households will provide more meaningful information than aggregated data of those same households.

The Department recommends application of anonymized data for study and program design.

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

The Department does not recommend any changes be made to ODAS section III.B.(2)(v) at this time.

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?*

The current standards specify that anonymized CEUD should be reported in intervals no shorter than hourly. As the Department noted previously, one use case we can envision is for researchers wanting to understand individual customer usage profiles. In this type of use case, hourly data is likely to be a desired interval.

The Department supports hourly as the shortest time interval.

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 Department believes that maintaining customer privacy is critical. Using a conservative privacy assumption requires each hour of an hourly dataset to meet the 15/15 screen is more costly. The tradeoff is therefore one of increased cost or increased privacy. Since Standard VI.A. permits the utility to charge the requestor a fee based on the utility's actual costs to create and deliver the data, that increased cost for increased privacy should be borne by data requestors. However, to protect ratepayers from the costs of data requests, the Department recommends the Commission explicitly require utilities to reflect costs and revenues associated with responding to data requests for anonymized data in rate cases.

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? If so, what is the appropriate threshold for limiting the application of the Standards to commercial and industrial natural gas and electric customers for anonymized CEUD requests?*

The benefit of keeping the 5 MW exemption is unclear. The Department recommends removing the 5MW exemption.

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

Standard B.1.(vi)(b) currently refers to "CUD," and should be amended to read "CEUD."

Standard B.2.(iv)(c) reads:

- (iv) Anonymized CEUD may be requested by:
- (c) Entities that provide or seek to provide demand response, energy efficiency, or other services to a utility may access anonymized data for the sole purpose of providing such services or preparing a proposal to the utility to do so.

The Department recommends it be modified for grammatical consistency. The Department suggests the following:

- (iv) Anonymized CEUD may be requested by:
- (c) Entities that provide or seek to provide demand response, energy efficiency, or other services to a utility, under the condition that the requested data be used ~~may access anonymized data~~ for the sole purpose of providing such services or preparing a proposal to the utility to do so.

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

As noted in response to Question 4 above, the Department recommends the Commission explicitly require utilities to properly reflect costs and revenues associated with responding to data requests in rate cases. At this time these costs may be *de minimus*, but the Department expects that the time and expense associated with creating and delivering anonymized data sets could be greater than that used to create and deliver aggregated data sets.

III. CONCLUSIONS AND RECOMMENDATIONS

The Department's conclusions and recommendations are summarized below:

- The Department recommends application of anonymized data for study and program design;
- The Department does not recommend any changes be made to ODAS section III.B.(2)(v) at this time;
- The Department supports hourly as the shortest time interval;
- The Department recommends the Commission explicitly require utilities to properly reflect costs and revenues associated with responding to data requests in rate cases;
- The Department recommends removing the 5MW exemption;
- The Department recommends amending Standard B.1.(vi)(b) of the Standards from "CUD" to "CEUD," and;
- The Department recommends amending Standard B.2.(iv)(c) to be read as follows:
 - (iv) Anonymized CEUD may be requested by: (c) Entities that provide or seek to provide demand response, energy efficiency, or other services to a utility, under the condition that the requested data be used ~~may access anonymized data~~ for the sole purpose of providing such services or preparing a proposal to the utility to do so.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. E, G999/M-19-505 and E, G999/CI-12-1344

Dated this **4th** day of **March 2024**

/s/Sharon Ferguson

[illegible]

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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-505_Official
Greg	Palmer	gpalmer@greatermngas.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
Audrey	Partridge	apartridge@mncee.org	Center for Energy and Environment	212 3rd Ave. N. Suite 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Ben	Rabe	rabe@fresh-energy.org	Fresh Energy	408 St Peter St Ste 220 St. Paul, MN 55102	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
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-505_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-505_Official
Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-505_Official
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-505_Official
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-505_Official
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-505_Official
Caitlin	Straabe	caitlin.straabe@mdu.com	Great Plains Natural Gas Co.	400 N 4th St Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-505_Official
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_19-505_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_19-505_Official
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-505_Official
Jeff	Zethmayr	jzethmayr@citizensutilityboard.org	Citizens Utility Board	309 W. Washington, Ste 800 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-505_Official