

June 8, 2023

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, Division of Energy Resources
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, Division of Energy Resources (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 June 2, 2023, the Minnesota Large Industrial Group (MLIG) filed a petition requesting the Commission modify its March 13, 2023 Order in these matters.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve MLIG's petition, with a modification.** The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ Stephen Collins
Financial Analyst

SC/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

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

I. INTRODUCTION

On June 7, 2023, the Minnesota Public Utilities Commission (Commission) issued a Notice of Comment period requesting comments on whether the Commission should adopt the proposed amendment to its March 13, 2023 Order in Docket Nos. E,G999/M-19-505 and E,G999/CI-12-1344, to bring the Open Data Access Standards into compliance with H.F. 2310 as recommended by the Minnesota Large Industrial Group (MLIG).

II. DEPARTMENT ANALYSIS

A. BACKGROUND

1. *November 20, 2020 Order*

On November 20, 2020, in Docket Nos. E,G999/M-19-505 and E,G999/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. The Commission approved the Standards as attached to the Order and stated that, at that time, the Commission would apply the standards to whole building aggregated CEUD for building owners and benchmarking purposes. The Standards as approved in the November 20, 2020 Order did not apply to commercial and industrial (C&I) customers with peak demands greater than 5 megawatts (MW). However, the Commission stated its intention to further refine the Standards and requested comments on several issues, including the large C&I exemption.

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.

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 body of the Order and an updated version of the Standards attached to the Order. In addition, the Commission removed the blanket exemption for commercial and industrial (C&I) customers with peak demands over 5 MW. The Commission retained the exemption only for:

- aggregated⁴ 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 thus removed the exemption for other aggregated⁵ CEUD data sets,⁶ such as community-level CEUD. As explained in the body of 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.⁷ 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 body of the March 13, 2023 Order.

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

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

⁴ 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.

⁵ 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.

⁶ 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.

⁷ 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.

3. *Minn. Stat. § 216C.331, Subd. 8(d)*

On May 25, 2023, House File 2310 became effective, which among other things enacted Minn. Stat. § 216C.331. Subdivision 8, paragraph (d) of this new statute states as follows:

Notwithstanding any other provision of law, a qualifying 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 qualifying utility under an energy and conservation optimization plan, unless the customer provides written consent to the qualifying utility.

B. *REVIEW OF MLIG JUNE 2, 2023 PETITION*

On June 2, 2023, MLIG filed a petition requesting the Commission amend the March 13, 2023 Order by adding the exact language from Minn. Stat. § 216C.331. subd. 8(d) as an additional paragraph at the end of the Purpose and Scope section of the Standards.

On June 5, 2023, Citizens Utility Board of Minnesota (CUB) filed a letter stating that CUB does not oppose MLIG's petition.

The Department has two concerns with MLIG's proposed modification. First, the Standards themselves, as attached to the Order, do not refer to the C&I exemption; rather this exemption is set forth in the body of the Order. Second, the Department believes it is unwise for the Commission to adopt new statutes as a matter of course into its orders. While the new statute as currently written applies now, it may be rescinded or modified in the future.

However, the Department agrees with MLIG that the new statute in its current form supersedes parts of the language in the Commission's March 13, 2023 Order. As such, someone reading the Order who is not aware of Minn. Stat. § 216C.331. subd. 8(d) may get confused.

The Department therefore proposes a slight modification. Instead of codifying the existing version of Minn. Stat. § 216C.331. subd. 8(d) verbatim into the Standards, the Commission should instead add paragraph I.B. stating as follows:

These standards must abide by all existing Minnesota statutes. In any case where a statute contradicts with a standard either as set forth in this document or the body of a Minnesota Public Utilities Commission order pertaining to these standards, the statute prevails.

In addition, consistent with its prior orders in this docket, the Commission could, for the sake of clarity, describe in the body of its order (approving MLIG's June 2, 2023 petition, with modifications) how 216C.331. subd. 8(d) may supersede the partial large C&I exemption.

III. RECOMMENDATION

The Department recommends the Commission approve the petition with the modification described directly above.

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 **8th** day of **June 2023**

/s/Sharon Ferguson

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Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-505_Official

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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