

MISSION:DATA



April 26, 2021

Via Email

Public Utilities Regulatory Authority
Office of Education, Outreach, and Enforcement
10 Franklin Square
New Britain, CT 06051

RE: **Docket No.14-07-19RE06, PURA Investigation into Redesign of the Residential Electric Billing Format – Five-Year Review, Request for Written Comments**

Acadia Center and Mission:data Coalition (Mission:data) respectfully submit these comments in response to the Notice of Request for Written Comments (Notice) in the above-referenced proceeding before the Public Utilities Regulatory Authority (PURA) Office of Education, Outreach, and Enforcement (EOE). The purpose of this docket is “to examine whether the standard electric distribution company (EDC) billing format and Internet web site for a residential customer’s account remains a useful tool and determine which specific modifications are warranted for implementation.”

Acadia Center is a non-profit research and advocacy organization committed to advancing the clean energy future. Working at the intersection of government, industry, grassroots organizations, advocates and communities, Acadia Center develops policy solutions for the Northeast’s systemic energy challenges.

Mission:data is a national non-profit organization that advances “energy data portability” policies across the country so that consumers can access innovative new services to help them manage their energy usage and costs. Mission:data has 30 member companies, representing over \$1.0 billion per year in sales, that provide new services such as “no-touch” virtual energy audits, alerts when energy use deviates from norms, and home automation systems that manage energy usage during peak demand periods. We have helped develop data privacy and data access policies in regulatory proceedings across 15 states and the District of Columbia. As a result of our work, over 36 million electric customers nationwide are subject to

data portability requirements, meaning the customers can easily direct their utility to send their energy usage and cost information to a software tool, such as a smartphone “app,” in order to better manage monthly bills.

The Notice described several objectives, among them to improve customer understanding of usage and cost drivers, and why line items or billing components change. While the appearance of utility bills are important considerations, EOE should also look beyond the bill to help customers better understand and manage their energy costs. The first step in this process is to recognize that modern consumers want new energy management tools, but many, if not most, of such tools are only available from non-utility providers. A National Grid survey found that a majority of both residential and commercial customers expressed interest in tools and devices that can help them manage their energy use.¹ Advances in software and hardware, coupled with the plummeting cost of computing power, have enabled a wide range of new energy management offerings from the private sector. An analysis by Mission:data of 12 studies found that energy savings of 6% to 18% are possible when consumers have access to informational tools such as disaggregations of energy usage, actionable feedback and smart controls.² Many energy management offerings have a business model that is entirely separate from a distribution utility – for example, home security systems that include an energy management component. A customer’s ability to access and use such offerings depends on their ability to easily grant secure access to their information held by their utility. Thus, achieving objectives such as empowered consumers and more economical energy usage is dependent on data portability.

By way of analogy, in the banking sector, customers are increasingly using budgeting apps on their smartphones that securely access their banking data from financial institutions and provide a holistic view into their financial health. Innovative finance apps are used by millions of Americans, but many (if not most) such apps were developed by innovative startup companies, not the incumbent banks. While easy-to-understand monthly bank statements are important, modern consumers increasingly seek out alternative software solutions to manage their information and make recommendations about their finances.

Therefore, **Acadia Center and Mission:data recommend that EOE consider a centralized, state-wide energy data repository.** A centralized repository is a necessary part of data portability infrastructure in Connecticut because, as the state moves to advanced metering infrastructure (“AMI”), consumers will need a mechanism to easily and securely share their granular energy usage information with energy management providers. A centralized repository provides a single access point for such providers and ensures technological consistency across the state.

¹ National Grid, *Value Proposition Research: A Study of 3 Energy Solution Areas* (2017).

² *Got Data? The Value of Energy Data Access to Consumers*. Mission:data Coalition, 2016. Available at <http://www.missiondata.io/s/Got-Data-value-of-energy-data-access-to-consumers.pdf>

Other states, such as New Hampshire and Texas, have found considerable benefits from a centralized approach. Since 2013, Texas utilities have administered Smart Meter Texas (“SMT”), a state-wide web portal and database that facilitates the sharing of 15-minute usage data with retail energy providers and energy management firms across over 7.6 million Texans.³ In 2019, the New Hampshire legislature passed Senate Bill 284, which directs the Public Utilities Commission to consider a multi-use energy data platform in order to “implement fully the state energy policy and make the state’s energy systems more distributive, responsive, dynamic and consumer-focused.”⁴ In both states, one of the motivations behind a centralized repository is to reduce the costs associated with accommodating utility-specific data types, data formats and technical access requirements. Energy management firms are less likely to make their offerings available to Connecticut residents if each Connecticut utility has its own set of technical idiosyncrasies.

Another benefit of a centralized repository stems from adherence to standards. Acadia Center and Mission:data strongly support adherence to the Green Button Connect My Data (“GBC”) standard, which was developed by the U.S. Department of Energy and National Institutes of Standards and Technology. Smart Meter Texas follows the GBC standard, as do California’s, Illinois’s and New York’s utilities. Standards help ensure that innovations from Connecticut firms can be more easily “exported” to other states, benefitting Connecticut’s economy. Conversely, Connecticut residents can have access to energy management offerings developed in states with GBC mandates such as California and New York, because those firms could more easily begin offering services in Connecticut.

While improving the presentation of information on utility bills is important, we ask that EOE also begin to investigate a centralized data repository for Connecticut. An investigation should include workshops to identify (i) the most valuable uses of energy-related data; (ii) distributed energy resources firms already serving, or likely to serve, Connecticut consumers; (iii) potential benefits to ratepayers in terms of billing savings and peak demand reductions; and (iv) privacy and security approaches. We look forward to participating in this process.

Thank you for the opportunity to provide comments.

Respectfully submitted,

April 26, 2021

_____/s/_____
Michael Murray
Mission:data Coalition

³ For background on SMT, see:

<http://www.missiondata.io/news/2017/9/22/5-things-you-dont-know-about-smart-meter-texas>

<http://www.missiondata.io/news/2018/5/10/texas-decision-enhances-customer-choice-of-advanced-energy-providers>

⁴ <https://legiscan.com/NH/text/SB284/id/2012441>

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