



Compendium of Standards and Requirements for Utility Customer Energy Data Access

This document gathers information, orders, and guidance about how several public utility commissions (PUCs) have handled customer data sharing and access across a variety of use cases as of September 30, 2025. Regulators can use this information to consider how they can manage data access in their jurisdiction.

NARUC staff compiled information on several states via commission dockets and orders; see Table 1. While many utilities have implemented Green Button Connect or other customer data access platforms, the table only includes states where the commission has set (or is the process of setting) rules and orders for implementing such platforms. Most of the states in the table have open dockets on data access issues. As a result, some of the table entries have not yet been ruled on or decided. All of the states in Table 1 require customer consent to the utility with the exception of Rhode Island, where details are still pending.

Table 2 presents information gathered by [Mission:data](#) on customer energy data access and sharing in five states that have implemented Green Button Connect: California, Colorado, Illinois, New York, and Texas. Green Button Connect is an energy industry standard that allows utility customers to securely and automatically share their energy and water usage data with authorized third-party applications. The table complements Mission:data's online [Green Button Explorer](#) that scores utilities on data access based on terms & conditions, data completeness, onboarding, and user experience.

Table 1: Commission Actions on Customer Data Access

Technical standard required	Scope of data	Third party eligibility criteria	Standard authorization language for customers	Commission jurisdiction over third parties	Whole building data access
Connecticut Docket No. 17-12-03RE02					
Green Button Connect	“Usage data” is all energy Usage Data collected by a meter that is compatible with the most current North American Energy Standard Board standard for Energy Services Provider Interface (ESPI). It includes kilowatt-hours used, power factor, kW, frequency, current, or voltage.	Authorized Third Parties shall be required by an Electric Distribution Company to: (i) Demonstrate technical capability to interact securely with the Electric Distribution Company’s servers. (ii) Provide contact information and federal tax identification numbers to an Electric Distribution Company. (iii) Acknowledge receipt and review of these privacy and access requirements. (iv) Not have been disqualified as an Authorized Third Party provider in the past (v) Adopt and comply with the most updated version of the United States Department of Energy’s DataGuard Energy Data Privacy Program Voluntary Code of Conduct, or its successor, or a similar nationally accepted eligibility standard	The customer consent form or process shall include: (i) information to adequately identify the customer, consistent with, and no more onerous than, an Electric Distribution Company’s authentication practices when a customer creates an online account on an Electric Distribution Company’s website or when a customer calls the Electric Distribution Company by telephone; (ii) The intended purpose and the use of the data being requested; (iii) The time period (e.g., months, years) during which the secondary use will take place, if provided; (iv) The category of information to be shared, with a succinct description of each; (v) A process to document records of customer consent, including maintaining a voice recording of oral authorizations; and (vi) A process to maintain records of customer consent for at least three years following expiration of the Secondary Purpose.	None	None at this time (Section VII., Aggregated Usage Data of the Data Access and Privacy Framework includes a placeholder for potential data aggregation and anonymization requirements, but this is incomplete at this time.)

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Kentucky Rate Case 2020-00349					
Green Button Connect	Monthly or incremental energy usage data	None at this time	None at this time	None at this time	None at this time
Massachusetts Docket No. 21-80					
Green Button Connect	At this stage of the docket, these details have not been resolved				
Michigan Case No. U-20959					
A data sharing tool must produce exports that are Green Button-sourced or interoperable with that of Green Button technology, including the functionality of Green Button Connect My Data. Utilities without AMI are exempt.	Commission recently required utilities to individually list all data categories being shared in annual Data Disclosure reports and not to share customer-specific data itself.	Third parties must have stringent data privacy guidelines and procedures to protect customers' personal data from unnecessary, negligent, or accidental release.	None at this time	None at this time	"Use of whole building data that is interoperable with Energy Star Portfolio Manager is strongly encouraged because ESPM is currently the national standard for whole building energy tracking and assessment."
Missouri File No. ER-2024-0319					
Green Button Connect	At least 13 months of validated usage data and billing invoice data, along with customer name, premise, account, meter, load balancing authority, load serving entity, commercial pricing node, and elemental pricing node (if available)	None at this time	None at this time	None at this time	None at this time

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New Hampshire DE 19-197					
Developing statewide online energy data platform: “New Hampshire Energy Data Sharing Platform Hub”	<ul style="list-style-type: none"> Logical Data Model: Initially, not all NH Utilities will support all data fields listed in the MVP (Minimally Viable Product) list but are expected to provide these as the data becomes available and accessible to the Platform. If available, at least 24 months of historical customer data Any data provided that is included shall be in the current Green Button Connect My Data standard 	Third party must complete a qualification and registration process to ensure that any customer data downloaded from the platform remains in a safe, secure environment according to data privacy standards established by the commission.	Customers register to access and share data; each NH Utility develops its own customer consent process—see appendix C of Exhibit 1B for more details	None, but either the utility, or an authorized centralized cyber authority, shall assess Platform users’ compliance with privacy standards before allowing them to register to access varying levels of data	<p>The platform will also provide the ability for an authorized user to retrieve aggregated data sets containing multiple utility customers. This core capability is a combined function of both the Utility Backend Integration and API as well as the Platform Hub.</p> <p>The Utilities’ APIs will be responsible for providing to the Platform Hub API a multi-customer data set upon request in a Green Button file format. NH Utilities or Governance Council should seek to obtain certification from the Green Button Alliance before the Council considers other standard formats for data sharing of aggregated customer data.</p>
Rhode Island Docket No. 25-19-EL					
Pending	At this stage of the docket, these details have not been resolved				
Washington, DC FC1130					
Green Button Connect	At this stage of the docket, these details have not been resolved				

Table 2: Mission:data’s State-Level Policy Summary on Green Button Connect

Who submits consent to the utility – the customer or third party?	Technical standard required by Commission	Scope of data	Third party eligibility criteria	Standard authorization language for customers	Commission jurisdiction over third parties
California (E-4868, D1309025, Rule 24/32)					
“Click-Through” process adopted allows customer to begin and end enrollment on Third Party website	Green Button Connect (GBC)	48 months interval usage history, ongoing 15- or 60-minute readings, billing and account info, tariff, DR participation info. Also Home Area Network.	Must provide contact info; agree to privacy terms; not be on the Commission-maintained list of “banned” third parties.	Not entirely defined, but it must include the data privacy tariff.	Commission claims jurisdiction over any entity receiving utility-held data for 11 or more customers per D.11-07-056, but courts have not yet weighed in.
Colorado (16A-0588E, 18A-0194E)					
Customer. The customer needs to log into the utility’s website to grant an authorization.	“A nationally-recognized open standard and best practice.” GBC today, and utility has burden to prove GBC is no longer appropriate.	Usage history, near-real-time 15-minute readings and Home Area Network.	None. Rule 3027(e) says, “Nothing in these rules shall limit a customer’s right to provide his or her customer data to anyone.”	Yes, approved in 15A-0789E.	None
Illinois (17-0123, 15-0073, 14-0507)					
Customer.	Green Button Connect (GBC)	24 months interval usage history, ongoing 30-minute readings every day, and Home Area Network	Must agree to abide by ICC-approved tariff, which includes some privacy terms.	Yes, approved in 15-0073.	None

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New York (15-M-0180, 14-M-0101)					
ConEd supports customer submissions today, but PSC orders call for third party submissions as well	“Green Button Connect or alternate standard with similar functionality”	24 months interval usage history (marked actual, estimated or billed), ongoing 5- or 15-min readings, service address, electric account number, meter numbers, “ICAP” tag, rate class	Third parties required to sign Data Security Agreement (DSA).	None	Commission claims jurisdiction: DER Business Practice Manual; “truth in advertising” (15-M-0180 DER Oversight Order, Oct 19, 2017)
Texas (47472)					
Third party; Smart Meter Texas (SMT) then emails the customer a link to confirm	Green Button API ¹	24 months interval usage history, ongoing 15-minute readings (billing data not available)	Must agree to SMT Terms and Conditions.	Yes	None

¹ Texas deviates slightly from the standard to accommodate its unique market structure in which the retailers hold the consumer relationship, not the utility. Thus, the Green Button APIs are used, but not the authorization standard within Green Button Connect known as “OAuth.”