NARUC
National Association of
Regulatory Utility Commissioners

Data Access Policy Tools

September 15, 2025

Webinar Series

bit.ly/NARUC-smart-grid

Smart Grid / Grid Modernization

In recent years, state regulators have seen a surge in utility smart grid investments, from advanced metering infrastruc
appliances and distributed energy resources. In their role protecting the public interest, state regulators who oversee t
seek to balance benefits and costs. One way to prudently leverage new technologies is by ensuring new components a
future-proofed. NARUC has partnered with the U.S. Department of Commerce's National Institute of Standards and T
educate regulators on the value of smart grid interoperability and technical standards that support it.

Resources | Activities | Partners | More Information

- **Webinar Series: Customer Data Access**, July-September, 2025
  NARUC has developed a series of webinars that will provide detailed information about how customer data ac
  works, some of the key policy and regulatory issues, and the actions that states are taking to facilitate data acc
  desirable outcomes regulators.

1. Customer Data Sharing: What is it and why do we care? | July 8, 2:00pm – 3:30pm (Eastern)

The first part of this webinar explained:

- Energy consumption data and associated use cases, particularly in the residential and small commer
- How utilities collect and manage customer consumption/energy/billing data
- Evolution and status of data standards such as Green Button Connect, Electronic Data Interchange, IEEE2030.5
- Key industry and policy trends in customer data sharing, including data bills of rights and multi-utilit

The second part of the webinar was a live technical assistance session, during which participants had the questions specific to their situation and jurisdiction.

Presentation
Recording

2. Consent-based Data Sharing | August 12, 2:00pm – 3:30pm (Eastern)

A foundational service that utilities can provide customers and their third parties—ranging from retail sup companies—is secure, consent-based ability to share their interval energy data. This webinar will break do

Upcoming CPI Webinars and Trainings

- Thursday, September 25 – Hit Me with Your Best Bot: AI for Regulators
- Friday, September 26 – NCEP Load Growth Series, Webinar #1: Benefits and Stage Agency Roles
- Wednesday, October 15 to Friday, October 17 – Cybersecurity Training for Utility Regulators (in-person)
- Monday, October 20 - NCEP Load Growth Series, Webinar #2: Managing Costs and Risks

NARUC's Annual Meeting, Seattle, Washington
Sunday, November 9 to Wednesday, November 12

Agenda

- Overview of Webinar Series and Today's Session
  - *Jeff Loiter, NARUC, Technical Director*
- Moderator's Opening Remarks
  - *The Honorable Odogwu Obi Linton, Maryland Public Service Commission*
- Expert Presentations
  - *David Farnsworth, Principal, The Regulatory Assistance Project*
  - *Michael Murray, President, Mission:data Coalition*
  - *Jared Lawrence, Senior Vice President of Customer Operations and Digital Strategy, Chief Customer Officer, Eversource*
- Q&A
- State Updates
- Wrap-up

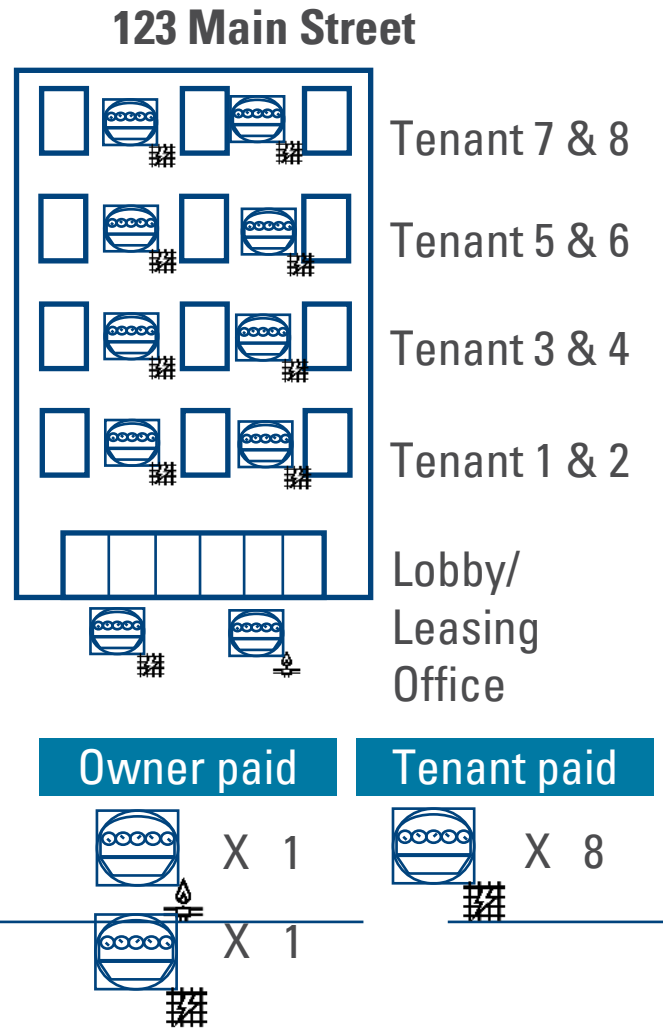
Sep 15, 2025

IMT-RAP Model Utility Data Access Law NARUC Data Access webinar

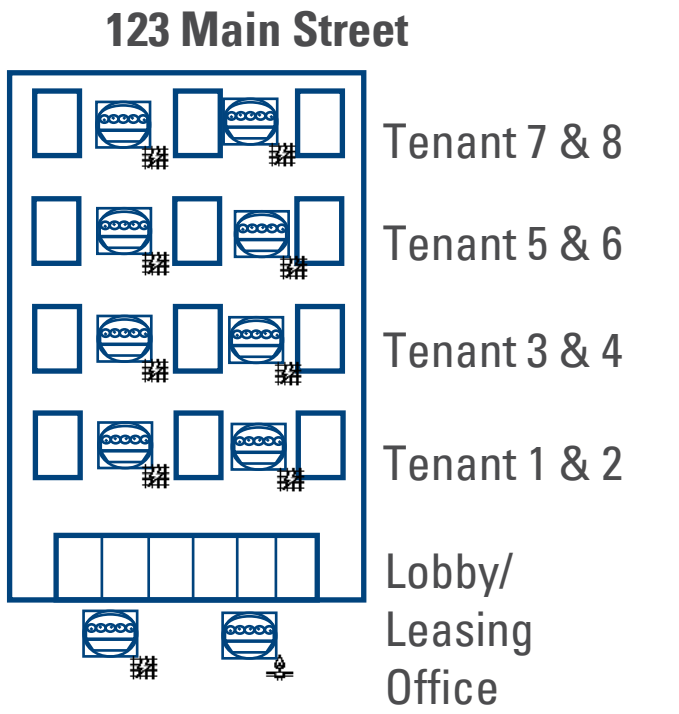
Dave Farnsworth, RAP

The Problem of Incomplete Energy Use Data

- 123 Main Street is an office building with 8 tenants, where each tenant pays their electric bill
- Owner only knows the energy use from the owner-paid electric meter and owner-paid natural gas meter
- Lack of data limits owner's ability to understand, document, and improve the building's energy performance, and the building's value.
- Many multitenant buildings operating as multifamily housing, offices, warehouses, and certain configurations of retail face the same problem.



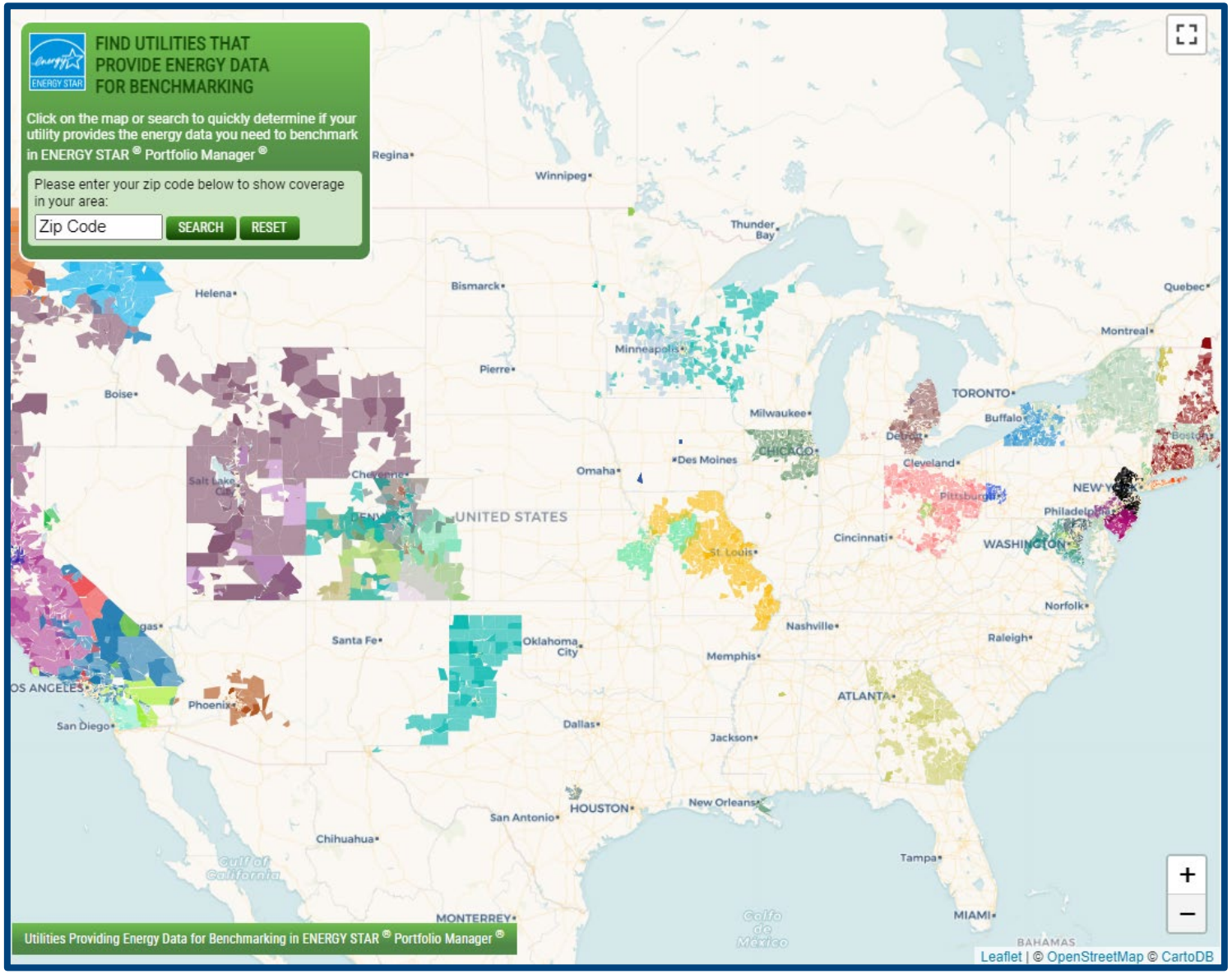
Utilities Can Provide Whole-Building Data



- But wait—the owner of 123 Main Street is in luck! The energy utility serving the property is one of the 80 or so in the U.S. (out of 1,000s of utility companies) that provide whole-building energy data to customers.
- Their utility can add up all the electricity usage at the building and provide the resulting whole-building consumption data to the owner.
- With some basic safeguards, this approach protects tenant data privacy while giving the owner the whole-building data they need.

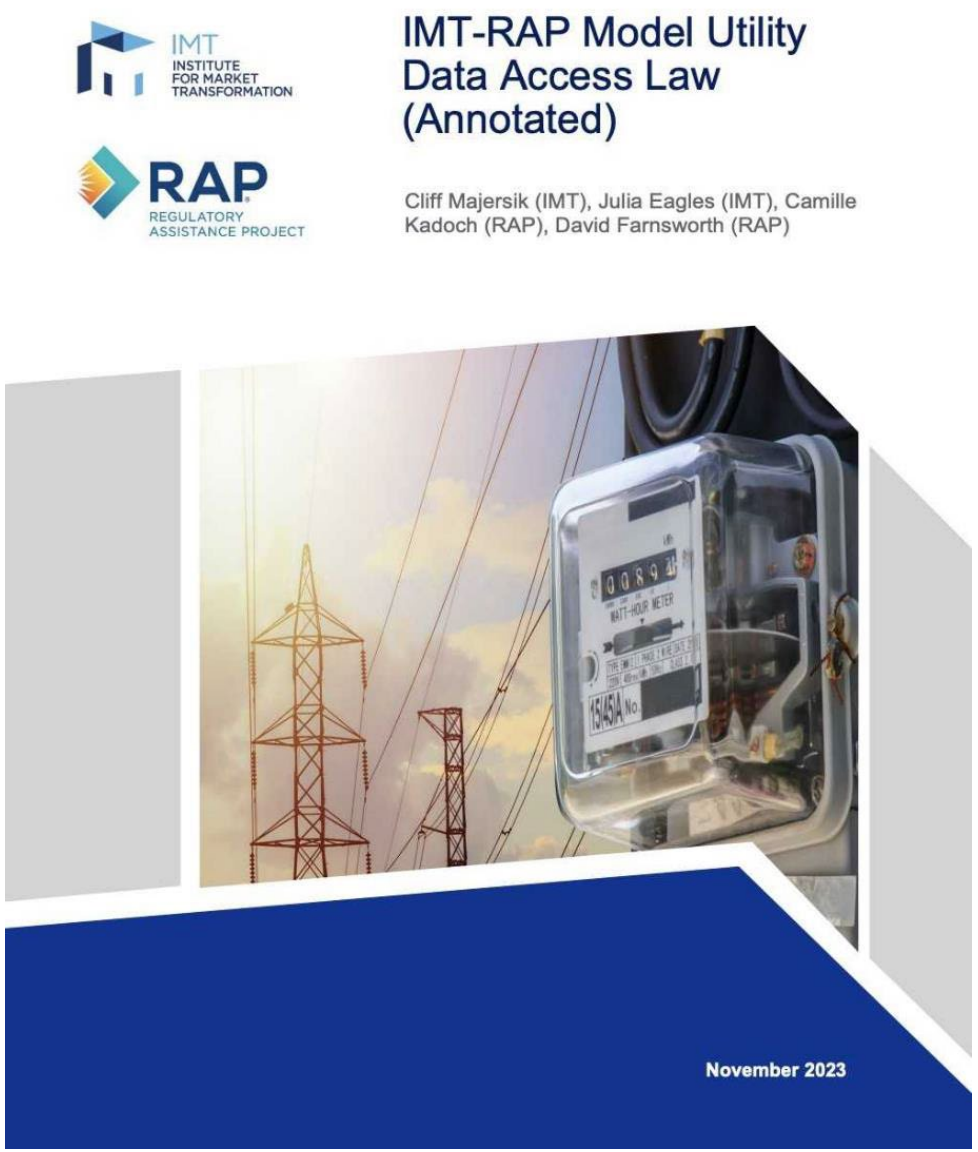
Where is data available?

energystar.gov/utilitydata



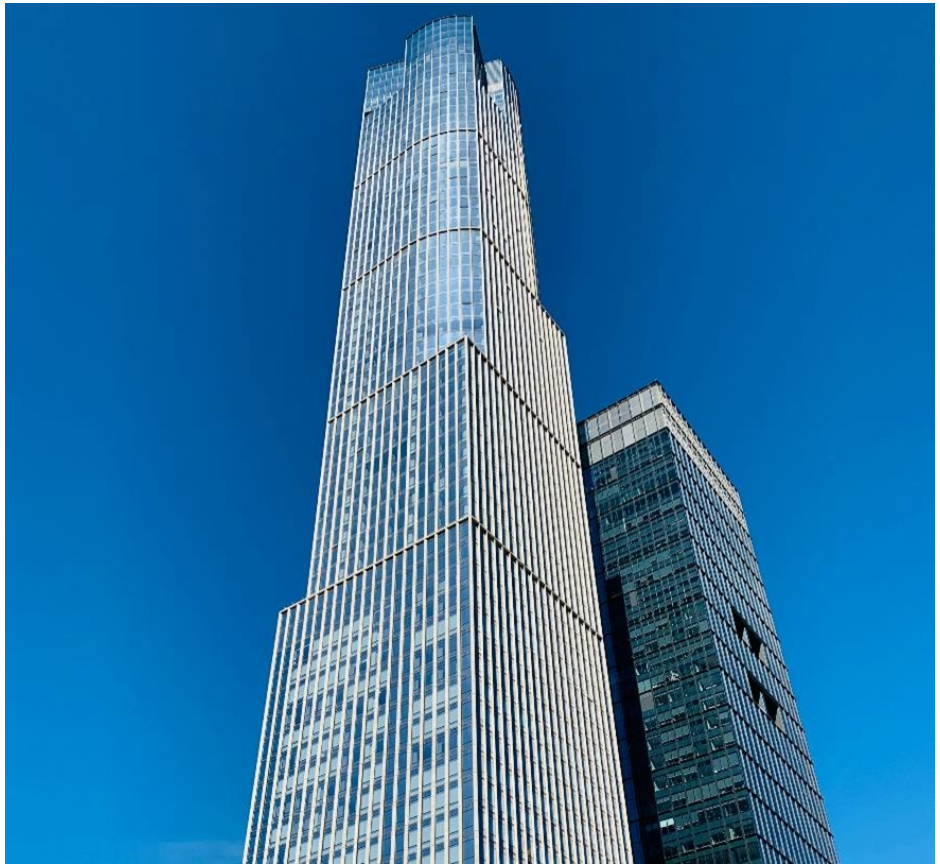
Energy Star Portfolio Manager

- EPA's no-cost **online** tool
- Assess the whole building energy use of existing buildings
- Receive a performance rating (1-100 score) or comparison to national average
- Track changes to energy and water use over time in single buildings, groups of buildings, or entire portfolios
- Track cost savings



- Developed in response to requests from building owners, policymakers, and others; written for adoption by states
- Authored by IMT and Regulatory Assistance Project (RAP), with key input from ENERGY STAR
- Published November 2023
- Model law is a living document
- www.imt.org/UtilityData

Big Picture



- Balances data access and privacy
- Requires utilities to share aggregated consumption data with building owners & digitally share data at account holder request
- Sets agency (usually utility regulator) to write rules guided by stakeholder process
- Codifies best practices from 80+ utilities that provide whole building data
- Puts requirements only on utilities and rule writers; requires nothing of owners
- Provides data access only to owners, landlords, and their designees

Different Contexts/Same Opportunity

- In 2011 **NARUC** adopts a **Resolution** on *Access to Whole-Building Energy Data and Automated Benchmarking*

- In 2024 **NARUC** adopts **Resolution** on *Customer Energy Usage Data for Multi-Tenant Properties*

- Different contexts, but the same opportunity
  - Buildings are responsible for 40% of total US energy use (NREL)
  - Needing to avoid carbon emissions, secure federal funding or simply waste less energy, the cleanest, lowest cost and most readily available MWhs and therms are avoided MWhs and therms.

RAP
REGULATORY
ASSISTANCE PROJECT

Thank You

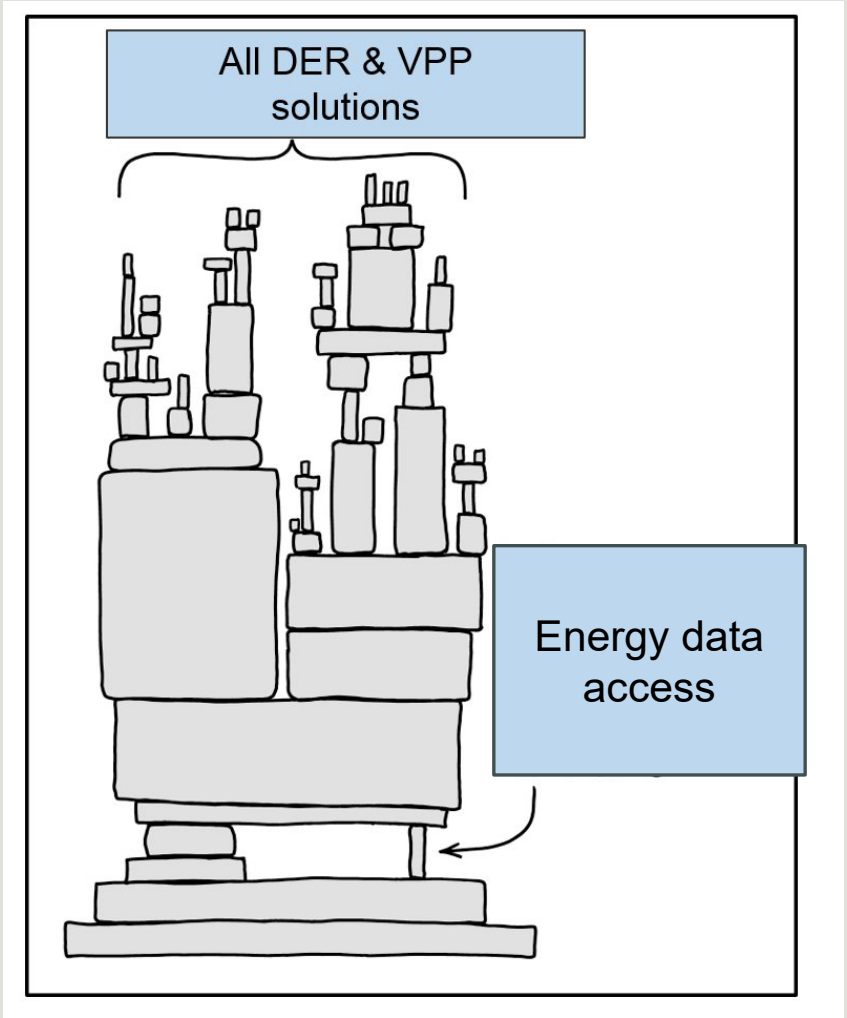
Please, feel free to follow up with me:

dfarnsworth@raponline.org

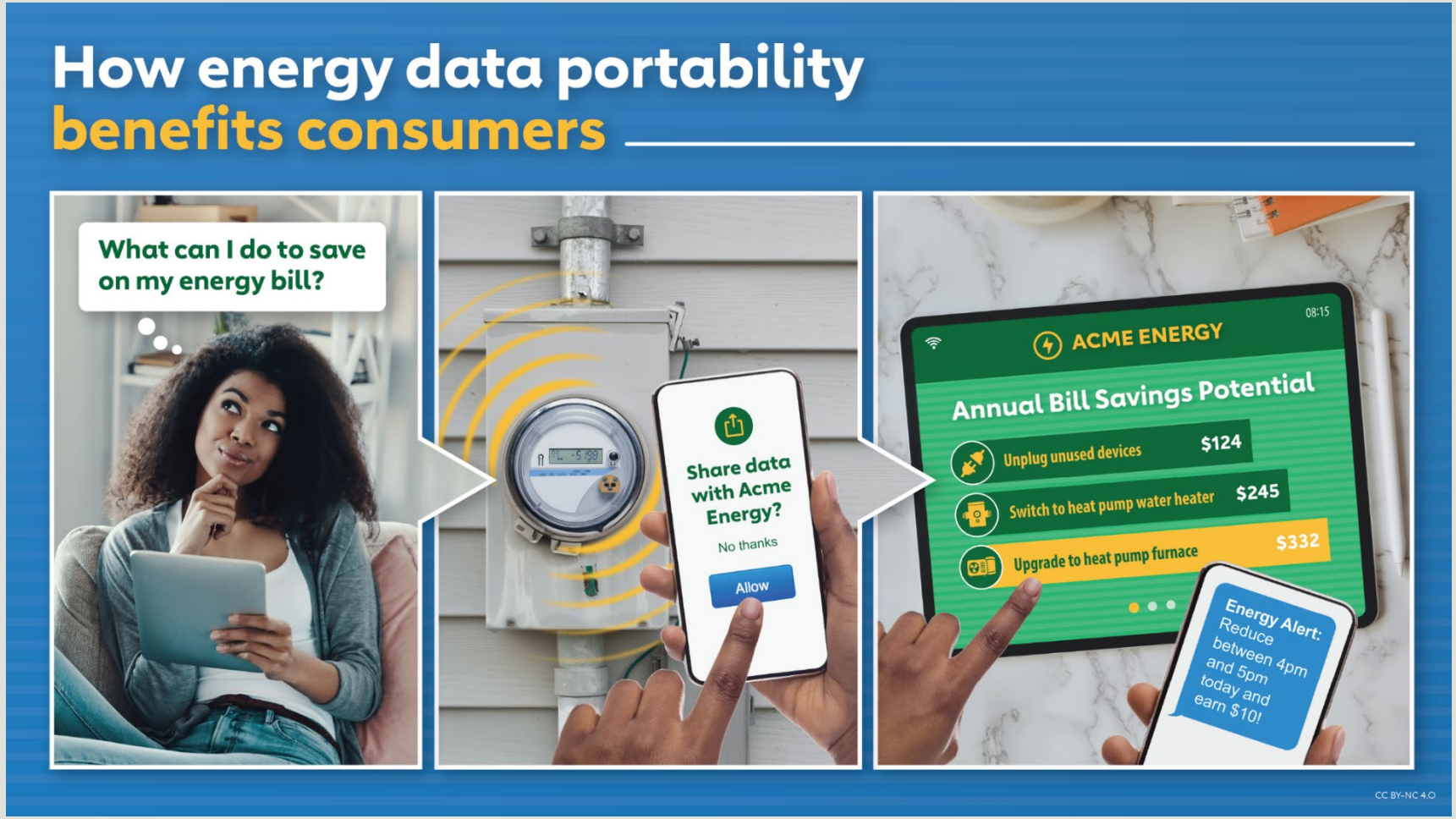
MISSION DATA
empowering energy savings

Agenda:

1. Background on data portability
2. Green Button Explorer
3. Policy focus: Who is “eligible” to receive customer data?
4. Lessons learned

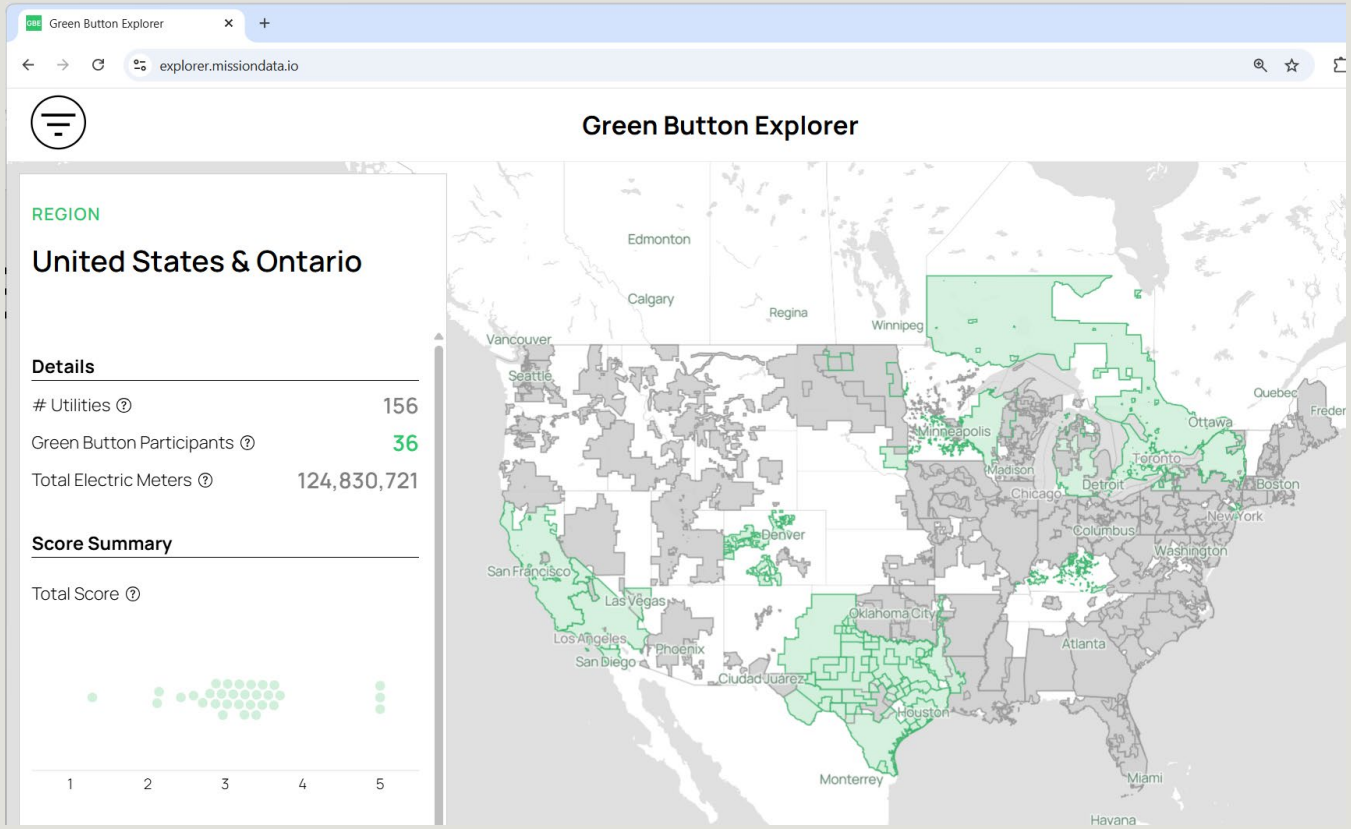


1. Background on data portability



- **Energy:** ~41 million electric customers have data portability today, some with 9 years of experience (CA, TX)
- **Banking**: ~50% of large bank data requests use secure APIs (100% in UK, Europe, Korea, etc.)
- **Healthcare**: Bipartisan federal law supports consumer-directed exchange; CMS can fine clinics up to $1M for data-blocking

2. Green Button Explorer



https://explorer.missiondata.io

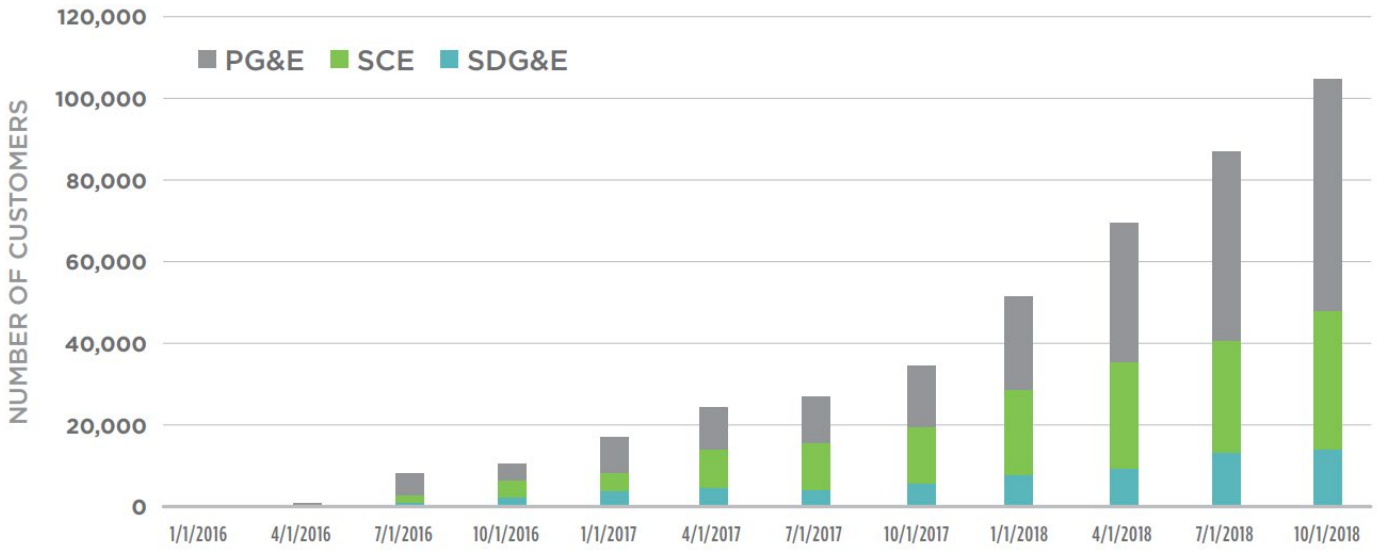
- **Today:** Types of customer data from each utility; ISO/RTO data requirements for DER aggregations
- **Tomorrow**: State-by-state policy comparison by data types, user experience requirements, cost recovery, authorization language, performance metrics, etc.

3. Policy: Who is “eligible” to receive data?

Stringency	State	Requirement
	Colorado	3027(e): “Nothing in these rules shall limit a customer’s right to provide his or her customer data to anyone.”
	Michigan	Not specified. Up to the utility’s discretion?
	California	D.11-07-056 & D.13-09-025: Recipients are subject to privacy rules, must provide annual notices to customers and must have reasonable security practices and procedures
	New Hampshire	DE 19-197: Recipients must comply with the U.S. DOE DataGuard privacy standard, including reasonable security practices and procedures, and pass risk-based cybersecurity checklist
	North Carolina	E-100 Sub 161: Recipients are subject to NDA and must complete a cybersecurity risk assessment administered by the utility (details TBD)
	New York	20-M-0082: Recipients are subject to Data Security Agreement, which includes self-attestation of cybersecurity controls

→ *More detail coming this winter to https://explorer.missiondata.io*

4. Lessons learned – the good ones



Number of California customers using Green Button Connect to share data with demand response providers, by electric utility and by quarter, 2016-2018. Source: Quarterly compliance filings, CPUC A.14-06-001 et al.

https://www.missiondata.io/s/Energy-Data-Portability.pdf

Attributes of success:

- Complete data set specified in rules
- Streamlined user experience (i.e. from 14 steps to 2-3 steps)
- Alignment with CAISO's DR
- Good technical documentation, FAQs
- A single Green Button Connect platform also serves other users like CCAs

4. Lessons learned regarding low utilization

State	Result	Lesson learned
Colorado	Only 52 customers out of 1.6M have shared their data (0.003%)	• "Real world" testing is very important (we discovered only single-meter customers are eligible) • Lacks a complete data set (i.e., usage history with older meters is excluded)
Illinois	ComEd and Ameren say their Green Button systems are working, but third parties are not able to register and there is essentially zero usage	• Buy Green Button software from specialists; don't build in-house • No oversight from ICC • A complete data set needs to be defined by the Commission

Thank you!

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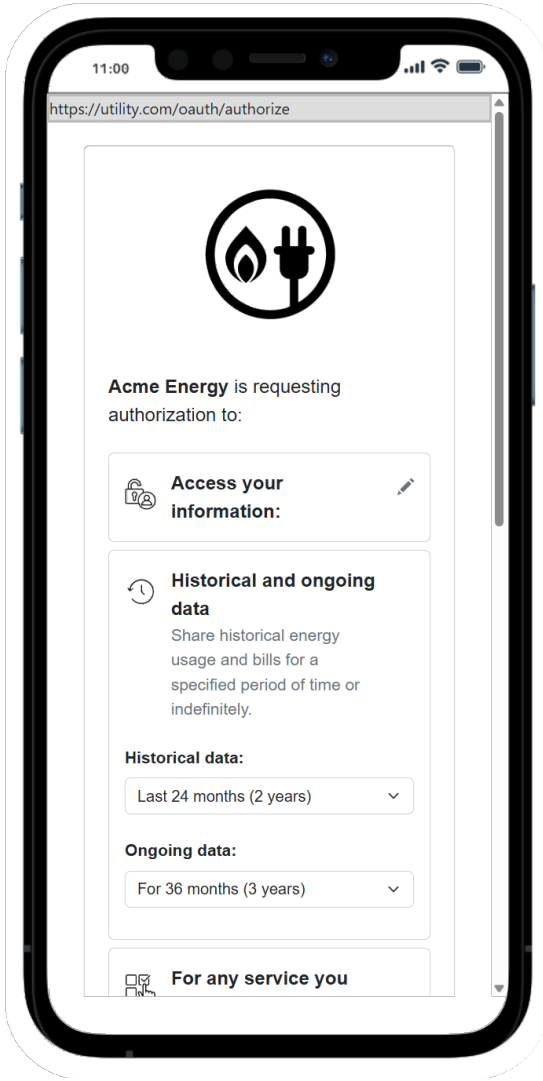
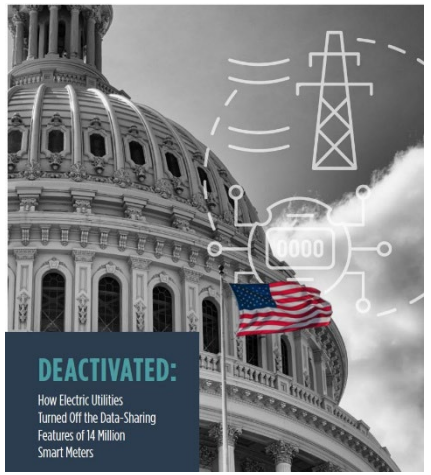
Interactive Consent Mockup:
https://labs.missiondata.io/toolkit.html





https://www.missiondata.io/reports

EVERSOURCE

Eversource Perspective on Customer Data Access

Jared Lawrence
SVP and Chief Customer Officer

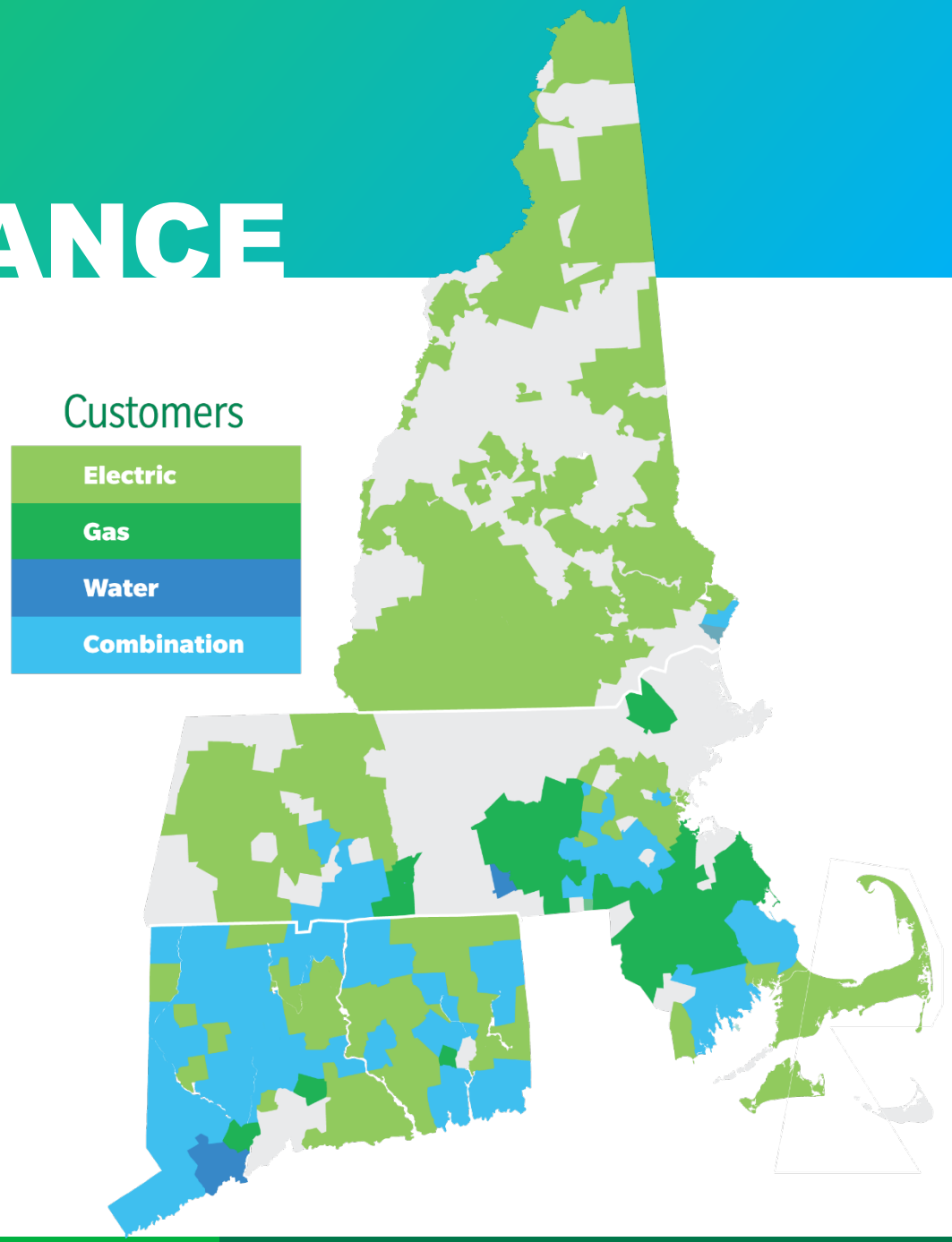
September 15, 2025

Agenda

- Brief introduction to Eversource
- Customer data access in the context of AMI implementation
- Data access examples
- Customer data sharing policy considerations

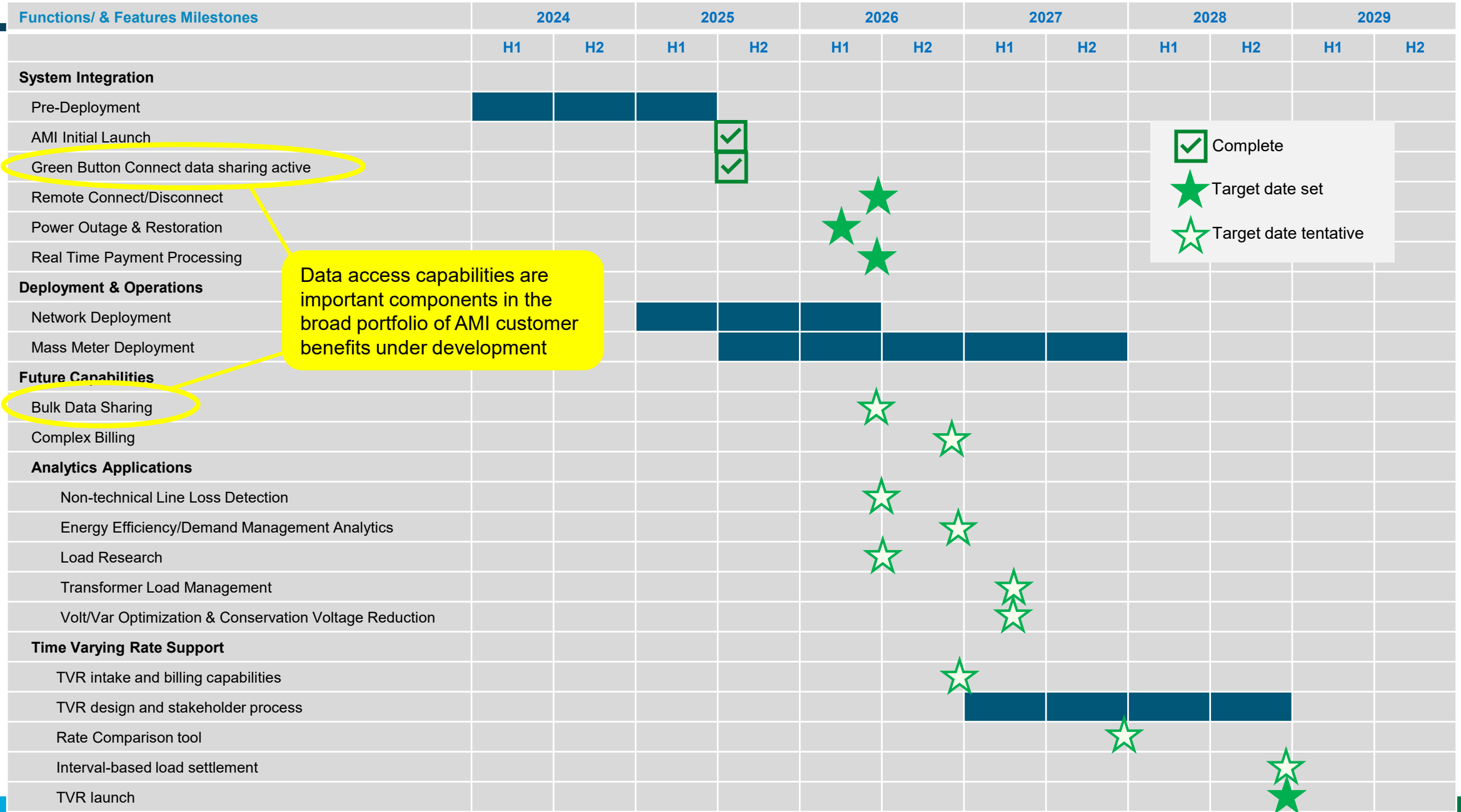
EVERSOURCE AT A GLANCE

4.4 Million electric, gas and water distribution customers across NH, MA and CT



MA AMI Implementation Timeline

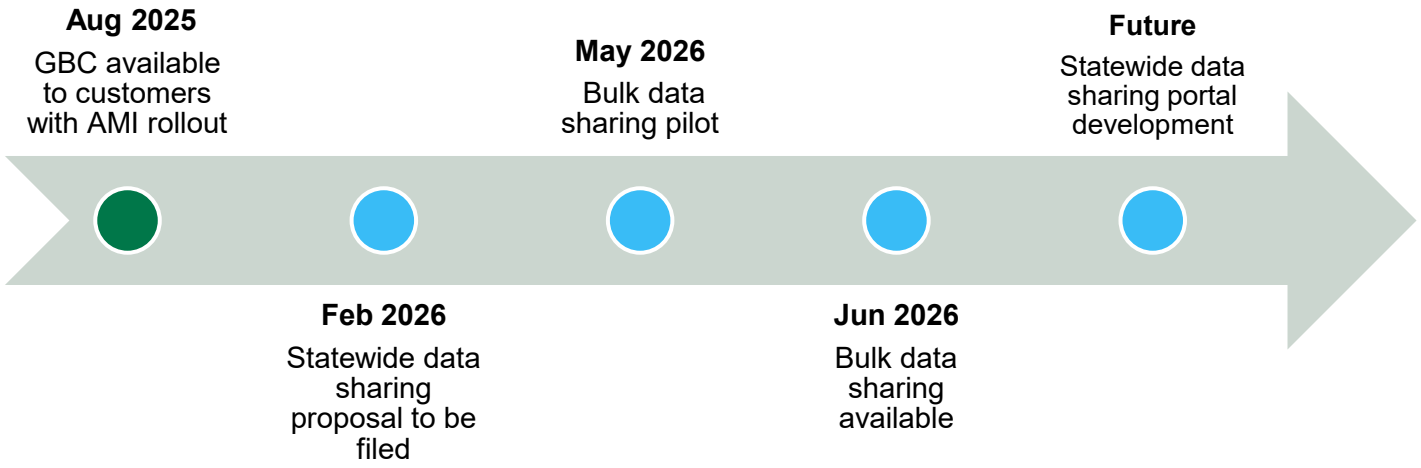
EVERSOURCE



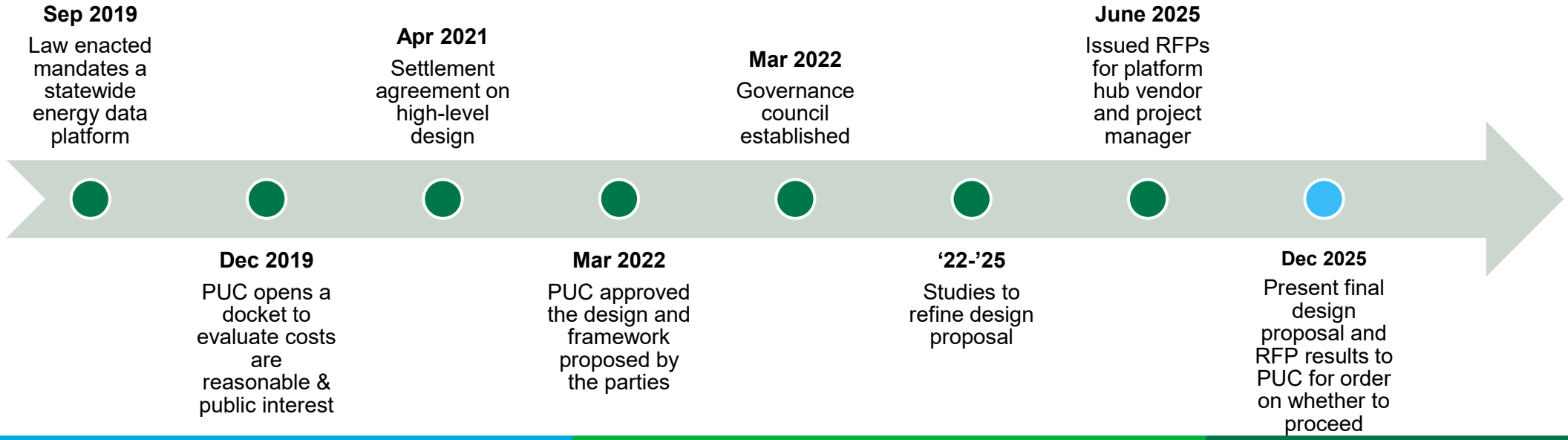
Customer data access

Massachusetts AMI deployment

- Green Button Connect
- Bulk data sharing
- MA statewide data sharing platform



New Hampshire statewide energy data sharing platform



Key features:

- API-based for security and scalability
- Platform "backend" at each EDC
- Common data structure
- Joint process to certify third-parties

Customer data sharing policy

EVERSOURCE

Guiding principles

- **Delivering AMI value**
- **Driving customer engagement**
- **Respecting privacy preferences**

- Eversource supports customers' ability to fully access their usage data and is developing the tools to efficiently manage their data sharing preferences
- Eversource supports third-party access to data to the maximum extent directed by its respective state regulators
  - Clarity is key to efficient system implementation and customer engagement
- Eversource advocates for data privacy and security standards for third-parties to become 'certified' recipients of customer data
- To avoid customer confusion and ensure accuracy, Eversource is committed to providing access to VEE-processed, billing quality data "near real time" (within 24-48 hours)

Customer data access policy: Maximizing participation versus privacy concerns

Default data sharing with authorized third parties (customers may opt out)

Benefits:
- Significantly greater customer participation increases potential value to customers

Risks:
- Perceived lack of control may fuel AMI skepticism

Vs.

Customers must opt into data sharing

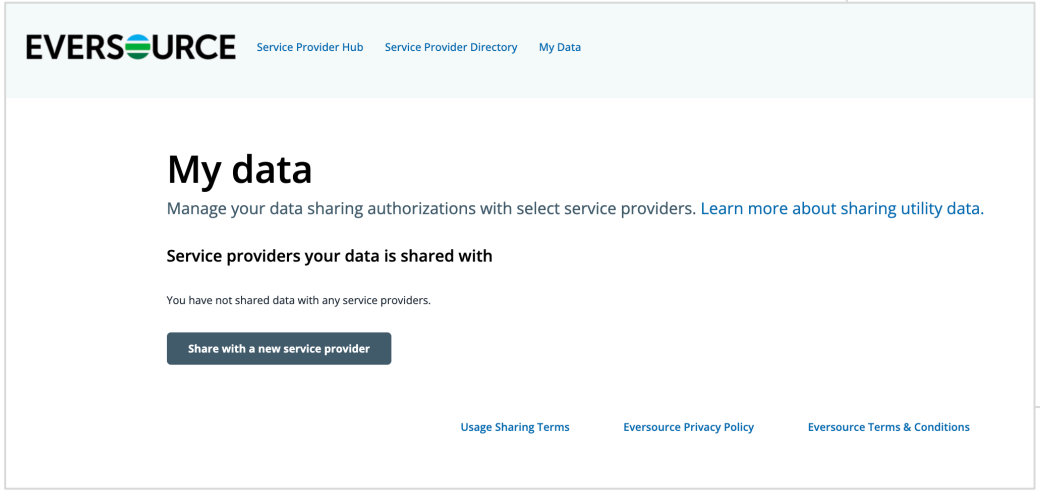
Benefits:
- Instills greater confidence in AMI in general, and particularly in data privacy

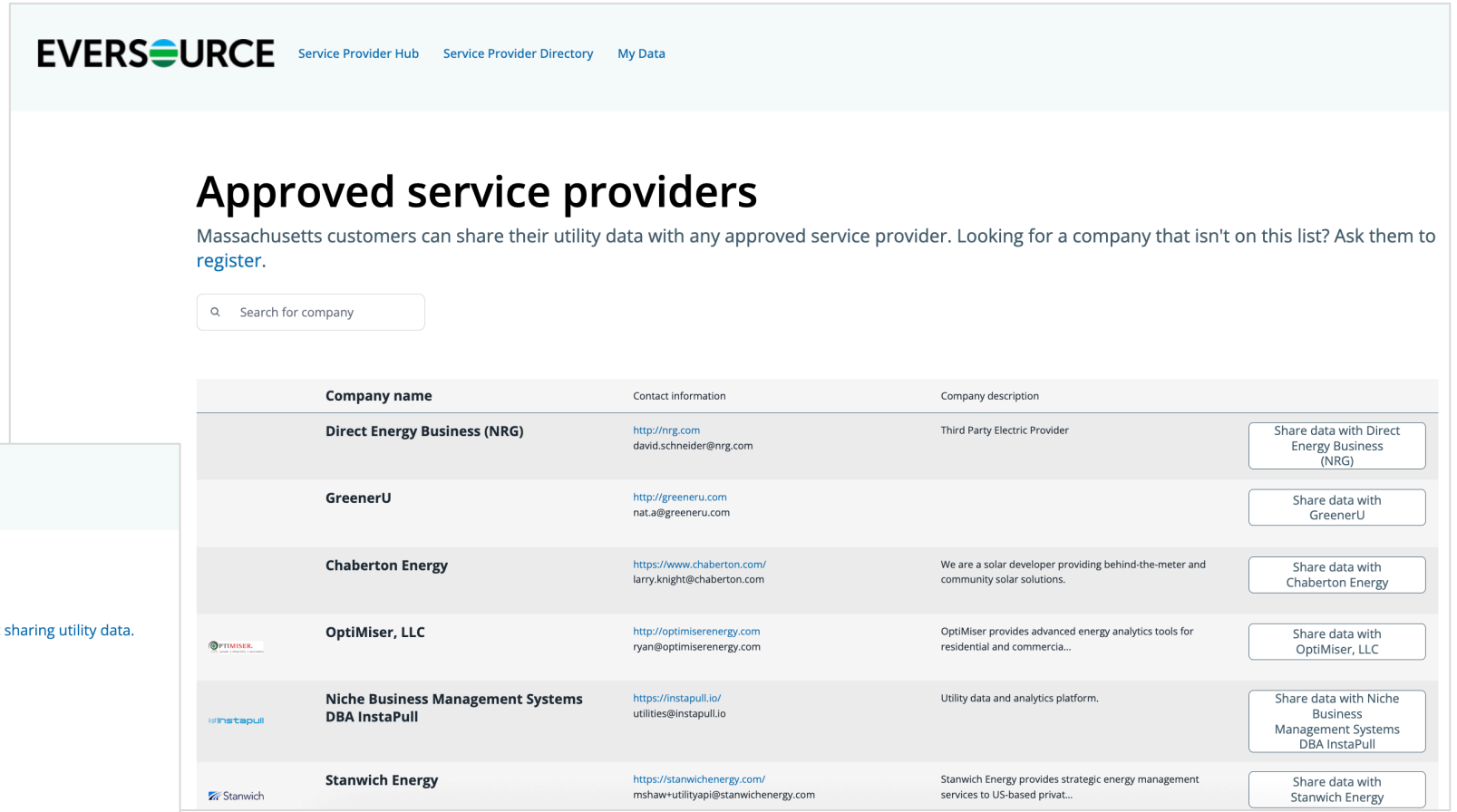
Risks:
- Customers less likely to take action to opt in, thereby reducing beneficial third-party engagement

Customer data access policy: Maximizing participation versus privacy concerns

Keys to success:

- Ease of data sharing preference management
- Third parties must deliver tangible value to customers to continually earn access





Thank you

Jared.lawrence@eversource.com

QUESTIONS?

Please use the Q&A feature in your Zoom Toolbar

State Updates

- Round 1: Please introduce yourself, your organization, and your position or role, and BRIEFLY tell us what's happening in your state related to data access that brought you to this discussion today?

- Round 2: Do feel that you (or someone in your organization) have the technical knowledge you need to support data access discussions and decision-making? If not, what are you missing?

- Round 3: Which states or utility implementations are you looking to as a model? What in particular is appealing about that model?

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Thank You

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https://www.naruc.org/