

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION
ELECTRIC AND NATURAL GAS UTILITIES

Development of a Statewide, Multi-Use Online Energy Data Platform

Docket No. DE 19-197

Petition of Greentel Group for Intervention

Pursuant to the Order of Notice issued by the New Hampshire Public Utilities Commission on December 13 in the above-captioned proceeding, N.H. Code Admin. Rules Puc 203.17, and RSA 541-A:32, Greentel Group hereby petitions for leave to intervene in this matter. In support of its petition, Greentel Group states as follows:

Rule Puc 203.17 provides that the Commission shall grant petitions to intervene in accordance with the standards of RSA 541-A:32. RSA 541-A:32, part of the Administrative Procedure Act, provides that a petition to intervene shall be granted upon a showing that the petitioner has “rights, duties, privileges, immunities or other substantial interests” that may be affected by the proceeding, and “the interests of justice and the orderly and prompt conduct of the proceedings would not be impaired by allowing the intervention.”

According to the Order of Notice, this docket concerns the development, implementation, and maintenance of a statewide, multi-use online energy data platform in accordance with RSA 378:50 through :54 (as enacted earlier this year as 2019 N.H. Laws Ch. 286, and as proposed by SB 284); issues relating to privacy policies for customer data in accordance with RSA 363:37 and :38; issues relating to the availability and transmittal of aggregated community-level energy usage data pursuant to RSA 53-E:4; and the question of whether the cost of the platform to be

recovered from customers is reasonable and in the public interest (or, alternatively, whether implementation of the platform should be deferred). For the reasons that follow, these determinations may impact the rights, duties, privileges, immunities, or other substantial interests of Greentel Group.

The Greentel Group is a clean energy company and our mission is to accelerate grid modernization by fostering an open ecosystem that taps into the creativity of the market for innovative solutions. Greentel works with distributed energy resources (DERs) developers, utilities and policymakers to develop a win-win regulatory framework and create new markets that encourage everyone to work together in the transition to a decarbonized, resilient and reliable grid.

To realize this vision requires the establishment of one common market foundation for energy entrepreneurs, utilities and regulators to be able to work together – we believe data is this foundation. At heart, Greentel is a technology company working to build a platform that fosters market activity 1) opening access to different types of energy data (customer, system and market) while 2) making sense of that data so policymakers can accelerate regulatory reform, energy entrepreneurs can deploy innovative solutions and utilities can unlock new business models all while maintaining grid reliability.

Greentel has worked extensively in multiple jurisdictions to consider statewide, multi-use energy data platforms. Between 2017 and 2018, we provided technical expertise to the District of Columbia legislature leading to the introduction of the Distributed Energy Resources Authority Act of 2018, which would establish a ‘Distribution Market Platform’ to not only open data access but enabling collaborative distribution planning and facilitate market transactions. In 2019, New York Commission staff began to conduct market research on the value of a statewide energy data platform and reached out to our organization for feedback. In response to this request, we led a voluntary initiative bringing together over 15 industry leaders from diverse parts of the energy sector to

holistically evaluate what data would be the most valuable to spurring market activity and submitted a report on these findings to the Commission. Over the past three years, Greentel has conducted a considerable amount of analysis on the subject before the Commission considering various aspects of the platform including; data availability, infrastructure needs, costs, security & privacy, governance structure and lessons learned from other jurisdictions. We believe our experience in the jurisdictions above and our combined expertise in policy, technology and cybersecurity may provide a valuable perspective to the New Hampshire Commission and inform the progress of this docket.

WHEREFORE, Greentel Group respectfully request that this honorable Commission:

- A. Grant the petition for intervention, and
- B. Provide any other such relief as it deems appropriate.

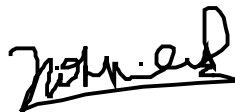
Sincerely,


Nikhil Balakumar
Principal
Greentel Group
718 7th St NW
Washington, DC 20001
240-672-7049
nikhil@greentelgroup.com

February 25, 2020

Certificate of Service

I hereby certify that a copy of this Petition for intervention was provided via electronic mail to the individuals included on the Commission's service list for this docket.



Nikhil Balakumar