

#### IV. APPENDIX A – SUMMARY OF PROPOSAL

1. **Data Types**. The following data types should be available via Green Button Connect (“GBC”):
  - a. Historical energy usage (kWh of electricity and therms of gas) over 24-48 months, at whatever time interval collected by the meter
  - b. Ongoing energy usage (kWh of electricity and therms of gas), available as quickly as possible after being collected, with the “quality” of reading marked
  - c. Historical and ongoing line items on bills (and associated quantities) over 24-48 months
  - d. Account number(s)
  - e. Meter number(s), if applicable
  - f. Premise address(es)
  - g. What rate the customer is on (by meter or premise, if applicable)
  - h. Any information necessary to determine eligibility for, or participate in, a demand response, energy efficiency or renewable energy program
2. **Standards and Implementation Architecture**. The JUNH, including its gas utilities, should:
  - a. Provide GBC to all customer types
  - b. Certify its GBC implementation every two years
  - c. Provide customer information from (1) above using the “Retail Customer” schema
  - d. Provide a “harmonized” GBC in which a third party can receive information through a single API regardless of which utility is providing the data; customer authorization experiences are consistent between the JUNH; and a customer served by multiple utilities can grant an authorization once
3. **Eligibility Criteria of Third Parties**. Utilities should be required to provide customer data to any third party who meets these criteria:
  - a. provides contact information to the JUNH;
  - b. demonstrates technical interoperability with the GBC platform;
  - c. accepts certain terms and conditions, to be approved by the Commission, including adherence to the U.S. Department of Energy’s DataGuard privacy standard (“DataGuard”); and
  - d. not be on the Commission’s list of “banned” or prohibited third parties

4. **Terms of Use**. The Commission should open a new proceeding to determine terms of use for third parties that:
  - a. are reasonable and appropriate, balancing the interests of third parties using the platform and customer privacy and security;
  - b. are open and non-discriminatory, meaning that any third party agreeing to the terms and conditions is entitled to receive customer data upon customer consent;
  - c. permit third parties to use information technology (“IT”) vendors to interact with the GBC platform; and
  - d. should not be changed or modified by utilities unless ordered by the Commission.
5. **Authorization Language and Format**. The utilities’ web-based authorization forms should be submitted for Commission approval and should:
  - a. succinctly describe the information to be shared;
  - b. display the third party’s name and the purpose for which it seeks customer information;
  - c. use icons and clickable links in order to hide larger blocks of text from the initial presentation, while making larger blocks of text accessible should a customer want to learn more; and
  - d. be consistent with the examples provided.

Parties should have the opportunity to comment on the JUNH’s submission. Upon approval, the Commission should enter a finding that the JUNH’s proposed authorization language and format satisfies RSA 363:38 Section I (a)’s requirement for obtaining “express consent” of the customer.
6. **Streamlined User Experience**. The utilities should provide a user experience for customers that:
  - a. adheres to OAuth 2.0 and best practices;
  - b. requires the minimum number of “clicks” of a customer;
  - c. supports alternative methods of authenticating customers who do not have, or do not want, an online account with the utility; and
  - d. is no more onerous for customers than the process a utility requires for a similar online transaction.
7. **Tools and Information for Third Parties**. The utilities should provide:
  - a. an online technical support ticketing system for third parties that have questions or detect errors in the platform;

- b. a testing environment and a production environment to assist with on-boarding third parties;
  - c. publicly-available, web-based methods for third parties to register and to provide thorough technical documentation, including API samples, updated at least monthly; and
  - d. the ability for a third party to register multiple times with the platform to accommodate different products or services from the same entity.
8. **Revocation of a Data-Sharing Authorization.**
- a. Any customer should be able to quickly and easily view, manage and revoke their authorizations at any time on a utility's website;
  - b. A third party may revoke an authorization, such as in cases if the third party discontinues a product or service; and
  - c. A utility may not revoke any authorization except by order of the Commission.
9. **Enforcement.** A utility with a reasonable suspicion of wrongdoing shall notify Staff, who has 21 days to gather information and resolve the issue. Punishment of third parties may include suspension or termination.
10. **Accountability of Platform Operations.** Utilities shall provide:
- a. Web-based reporting of performance metrics, including
    - i. Number of customers and web page views
    - ii. Number and type of errors generated
    - iii. Data delivery time (in seconds)
    - iv. Web page loading times (in milliseconds)
  - b. A service-level agreement ("SLA") with these attributes:
    - i. 99.5% uptime guarantee
    - ii. Meet timetables for acknowledgment and resolution of technical issues
    - iii. Data delivery within 90 seconds
11. **Utility Liability.** Utilities should not be liable for misuse of customer data provided that:
- a. The utility has operated the GBC platform prudently, and
  - b. Has followed the enforcement procedures described above.
12. **Governance and Change Management.** A Data Platform Committee:

- a. Consists of utility representatives, two DER representatives, one OCA representative;
  - b. Makes decisions by majority vote, following Roberts Rules of Order;
  - c. Reviews and attempts to resolve outstanding support tickets;
  - d. Refines and approves change requests less than \$250,000/year
13. **Cost Recovery**. Prudently-incurred costs should be recovered from all ratepayers. In addition, utilities may receive 25% per year of upfront costs as a performance incentive based on these metrics:
- a. Time elapsed for a random sample of customers to complete a data-sharing authorization with a third party
  - b. Average and maximum data delivery time (seconds) following customer authorization (searchable timeframe)
  - c. GBC system availability (uptime)
  - d. Number and type of errors generated, if any
  - e. Number and type of issues raised by third parties and customers, including severity, mean and max acknowledgment time, and mean and max resolution time
  - f. Number of complaints received from third parties, including type and severity
  - g. Number of customers with one-time and ongoing data-sharing authorizations
  - h. Time to complete third party technical and administrative onboarding
14. **Aggregated Data**.
- a. Aggregation standards should be use case specific, should evolve over time, and should be based on a mathematically rigorous framework such as differential privacy;
  - b. New Hampshire's Energy Efficiency and Sustainable Energy Board ("EESE Board") should convene experts and advise the Commission on recommendations for aggregated data privacy standards;
  - c. The 4/80 standard should be used for the purposes of EnergyStar benchmarking of commercial buildings.