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April 4, 2014

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VIA E-FILING

Dr. Burl W. Haar
Public Utilities Commission
121 7th Place East
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St. Paul, MN 55101

**Re: In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated
Energy Utilities
Docket No. E, G-999/CI-12-1344**

Dear Dr. Haar:

Pursuant to a request from Administrative Law Judge Tammy Pust, please find enclosed for filing the Minnesota Large Industrial Group's Response to comments provided by LHB, Inc. and the City of Minneapolis regarding customer energy usage data.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:kap
Enclosure

cc: Service List

**STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION**

In the Matter of a Commission Inquiry into
Privacy Policies of Rate-Regulated Energy
Utilities

PUC Docket No. E, G-999/CI-12-1344

**MLIG RESPONSE TO LHB, INC. AND
CITY OF MINNEAPOLIS COMMENTS**

The Minnesota Large Industrial Group (“MLIG”), a continuing ad hoc consortium of large industrial end-users of electricity in Minnesota spanning multiple utilities and functioning to represent large industrial interests before regulatory and legislative bodies, submits the following thoughts in response to the e-mail from LHB, Inc. on behalf of the City of Minneapolis and the memorandum circulated by the City of Minneapolis in preparation for the March 21, 2014 meeting.

I. BACKGROUND AND INTRODUCTION

MLIG greatly appreciates the thought put into the workgroup participants’ filings and proposals in using customer energy usage data (“CEUD”) to forward energy goals. But our concerns about the risks to large industrial customers remain. These concerns are amplified by claims from workgroup participants that MLIG’s CEUD is already public and/or there is little to no risk in making it public. MLIG believes that it is virtually impossible to guarantee a risk-free approach to data sharing. Therefore, MLIG respectfully requests that workgroup participants consider proceeding with caution - particularly initially.

To that end, MLIG wishes to provide some additional thoughts or insights into the e-mail from LHB, Inc. dated March 20, 2014 (the “LHB E-mail”) and examples brought forth by the City of Minneapolis in its memo (the “Minneapolis Memo”). In certain instances, MLIG is not entirely sure what specific lessons are to be drawn from the examples.

With respect to the LHB E-mail, the author provides little to no context or background regarding the Urban Land Institute’s Minnesota Regional Indicators Initiative (“ULI Initiative”). The purpose of the LHB E-mail is therefore not entirely clear. Furthermore, there are objections

from customers whose CEUD appears to have been unwittingly included in the ULI Initiative's work.

With respect to the Minneapolis Memo, MLIG assumes the inclusion of the utility programs in Table 1 is offered as support for its assertion that "the experience of other utilities across the country that currently provide aggregated data to third parties has not to date demonstrated significant risk." While MLIG has not exhaustively reviewed each aggregation threshold cited in the Minneapolis Memo,¹ it has attempted to find more information on some of the programs to better understand the context. A quick review suggests that the risks to customers, and industrial customers in particular, was not often lost on the parties implementing the aggregation thresholds or policies. Instead of standing for the proposition that the risks are not present or are overblown, they may instead illuminate potential avenues to guard against the risks presented. MLIG addresses some of the key factors in the utility programs included in Table 1 of the Minneapolis Memo that should be considered.

II. ADDITIONAL CONTEXT AND ANALYSIS

A. The LHB E-mail Should Not Be Viewed as a Justification for City-Wide CEUD Aggregation

The LHB E-mail asserts "In the case of a 4/0 policy (versus 15/15 currently being applied by Xcel, there is absolutely no way that an individual company's data could be extracted or deduced. The example in Table 1 submitted by [MLIG] is not applicable to the data we are receiving." These statements are troubling for two reasons.

First, at least two industrial customers within the cities covered by the ULI Initiative were unaware their CEUD was shared. The ULI Initiative appears to cover cities that are within the seven-county metro area, as well as Rochester and Duluth.² Two members of MLIG are located within cities that are part of the ULI Initiative. Neither member was aware of the ULI Initiative or provided consent to its CEUD information being shared to the ULI Initiative. Absent a better

¹ For a more thorough review, it would be helpful to have citations or detail on the programs referenced. Utilities may have multiple programs that vary in content depending on the jurisdiction being served.

² <http://regionalindicatorsmn.uli.org/energy-chart>.

understanding of what information was shared and how that information is protected, these members strenuously object to the production.

Second, because the majority of MLIG members are located in smaller towns and cities that are not part of the ULI Initiative, Table 1 in MLIG's prior memo remains very relevant to the issues being addressed by the workgroup. And how the 4/0 policy could be applied in a small town to protect industrial customers who view their CUED as proprietary is not clear from the LHB E-mail. For these reasons, MLIG respectfully urges caution in assuming city-wide data aggregation is sufficient to protect all customers based on the LHB E-mail.

B. The Minneapolis Memo Fails To Adequately Describe Programs in Other Jurisdictions

1. Voluntary Programs vs. Mandatory Programs

First and foremost, there is a very big difference between programs where data disclosure is mandated or required in some way, and those where it is optional, opt-in or voluntary. In the examples listed in Table 1 of the Minneapolis Memo, Puget, Avista and Seattle City Light may all be subject to reporting requirements set in place by the City of Seattle and discussed in Section 2 below. Independently, however, each may also allow voluntary programs for energy benchmarking. Puget Sound Energy MyData allows customers to request whole building energy use data from PSE, but consent is required if there are 4 or fewer tenants in the building.³ Avista's Automated Benchmarking Service also works with Energy Star's Portfolio Manager ("Portfolio Manager") to allow building owners to assess building performance. It is not, however, clear that the service is even available to buildings used for industrial purposes.⁴ Nevertheless and in both cases, the programs are voluntary.

In the case of ComEd (operating in IL), the utility offers an Energy Usage Data tool (integrated with Portfolio Manager like many others). The tool allows building owners or property managers to retrieve aggregated energy usage data for multi-tenant, commercial,

³ See <https://pse.com/accountsandservices/YourProperty/Pages/Automated-Benchmarking.aspx>.

⁴ See <http://www.avistautilities.com/business/benchmarking/pages/default.aspx>.

residential and industrial buildings. Parties elect to enroll in the program by completing and signing an enrollment form.⁵ The program also appears to be a voluntary.

2. Manufacturing and Industrial Exemptions

As mentioned above, three of the examples are utilities operating in the Seattle area that are subject to Seattle's Energy Benchmarking and Reporting Program (Ordinance 123226 and 123993).⁶ Avista Utilities, Seattle City Light and Puget Sound all operate in Washington and are likely subject to city code. In general, the program requires owners of non-residential and multifamily buildings (20,000 sf or larger) in the City of Seattle to track energy performance annually and report to the City. The policy was developed to support the City's Climate Action Plan. While the second Ordinance makes clear on its face that it does not apply to buildings used primarily for industrial manufacturing purposes,⁷ the first is interpreted by the Director of the Department of Planning and Development to exempt "buildings used primarily for manufacturing or industrial purposes."⁸ Thus Seattle's Energy Benchmarking and Reporting Program for buildings has carefully created an exemption aimed at industrial and manufacturing customers - something that is not clear by the inclusion of the Avista, Seattle City Light and Puget Sound examples in Table 1 of the Minneapolis Memo.

Similarly, the City of Austin implemented an energy conservation and disclosure ordinance that affects Austin Energy.⁹ The local law requires building owners to determine and

⁵ See <https://www.comed.com/business-savings/energy-tools/Pages/energy-usage-data.aspx>.

⁶ All ordinances and related rules are available on the City of Seattle website: <http://www.seattle.gov/environment/buildings-and-energy/energy-benchmarking-and-reporting/why-benchmarking-is-required--about-the-law>.

⁷ City of Seattle Ordinance Number 123993, Section 1, D ("This Chapter shall not apply to buildings used primarily for industrial manufacturing purposes.")

⁸ See Section D of Director's Rule 6-2011, published on December 5, 2011 and effective May 21, 2012 ("The following building types are exempt from all benchmarking, disclosure and reporting requirements: . . . (d) Buildings used primarily for manufacturing or industrial purposes, as demonstrated by submitting one of the following: a) A valid Certificate of Occupancy or construction permit documenting that at least 50% of the building is classified under the current Seattle Building Code as Factory Industrial Group F. This includes buildings used for assembling, disassembling, fabricating, finishing, manufacturing, packaging, repair or processing operations. B) DPD's self-certification exemption form, in which the building owner has verified that: neither they nor DPD staff have been able to locate a Certificate of Occupancy for their building; and their building meets the definition of a Factory Industrial Group F building as classified in the Seattle Building Code.")

⁹ City of Austin, Ordinance No. 20110421-002, amending Chapter 6-7 of the City Code Relating to Energy Conservation Audit and Disclosure Requirements (effective May 2, 2011). See Chapter 6-7 of the City of Austin Municipal Code, available at <http://www.austintexas.gov/resident/city-code>.

submit an energy benchmark rating for their facilities. Like others it relies on the EPA's Portfolio Manager tracking tool and the information that is made publicly available is the self-rated energy benchmarking rating. And like other examples, it includes an exemption for those that may have particularly significant energy usage. The ordinance applies to all commercial buildings located within the City of Austin boundaries that are served by Austin Energy with the following exception. Manufacturing buildings that have a use that "has met all requirements of a State of Texas sales tax exemption for manufacturing, processing, or fabricating tangible personal property for sale and the utility account holder has qualified for a Predominant Use Exemption for the Utility account(s) of the entire commercial facility."¹⁰

In other cases, such an exemption is not so clear. New York City has also enacted local energy and sustainability benchmarking laws.¹¹ Local Law 84 requires owners of large buildings (over 50,000 sf) to annually measure their energy consumption through the EPA's Portfolio Manager. The City publishes an annual covered buildings list and it appears as though there is no clear exemption for industrial or manufacturing uses. Building owners must submit data online annually to the City through the Portfolio Manager or potentially face fines.

In the case of ConEd (operating in NY), the utility will make aggregated energy use information available for the purposes of complying with NYC Local Law(s) 84¹² and 87, but only to the customer's Authorized Representative. The utility will not release the information without a completed and signed authorization form that specifically identifies the customer's Authorized Representative. Once executed, the Authorized Representative can access aggregated energy use data until the Authorization is revoked in writing by the customer.

3. Experience Remains Relatively Slight

In many cases, experience managing the data is not long-lived. Even in the case of Washington DC, which implemented a benchmarking law in 2007, reporting for private buildings began less than a year ago. In Washington DC, buildings over 50,000 sf are subject to

¹⁰ See, <http://www.austinenergy.com/wps/portal/ae/Programs/ECAD-Ordinance/for-commercial-buildings/>.

¹¹ New York City Local Law(s) 84 and 87.

¹² See, <http://www.nyc.gov/html/gbee/html/plan/1184.shtml>.

annual reporting requirements.¹³ PepCo supports this law by allowing customers to complete a Building Electricity Consumption Data Request Form and providing aggregated data. Private buildings only began reporting in April of 2013.

Likewise the City also included a couple of examples of online energy usage data comparison tools. MLIG notes that the Gainesville Green program is still in its beta form, with data still being uploaded and tested. In the case of Madison Gas and Electric, the program only applies to residential customers. Thus it is not clear what either example provides in terms of context for disclosure of industrial customer data.

4. EIA Data

The Minneapolis Memo states “Each year, in hundreds of instances, utilities provide to EIA total annual consumption data for customer classes that include only one customer. In these cases, the reported electricity sales in MWhs identifies total consumption of one individual customer in that year.”¹⁴ It is not clear to MLIG that the information provided is, in fact, total consumption. MLIG can only address Minnesota, in which two examples are worth noting. First, there is at least one unregulated utility where the information is not total consumption. Instead, it is the portion of electric consumption that is self-generated by an industrial customer. The remainder is purchased from the investor owned utility. Second, it is not clear how any customer can qualify as an industrial customer if that customer consumes 10 MWh or less in a given year. Perhaps here too the data only represents a portion of the total consumption. MLIG assumes this to be the case given the \$1,200/MWh apparently paid by one industrial customer.

III. CONCLUSION

MLIG hopes that the concerns and examples provided give some insight into what states or utilities that have moved forward earlier in time have done. In drawing any conclusions from them, however, it is important to keep in mind that some are voluntary in nature, many have not had much time reporting and handling the data (so as to better confirm that risks or problems will not be encountered), and many have included specific exemptions for buildings that are primarily

¹³ See Title V of The Green Building Act of 2006 (D.C. Law 16-234, D.C. Official Code § 6-1451.01 et seq.) (effective Mar. 8, 2007).

¹⁴ Minneapolis Memo, pg. 7.

used for industrial or manufacturing purposes. For these reasons, MLIG urges workgroup participants to consider proceeding with caution. MLIG looks forward to continued dialogue regarding CEUD production and protections for industrial customers.

Date: April 4, 2014

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Andrew P. Moratzka, hereby certify that I have this day, served a true and correct copy of the following documents to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

MLIG RESPONSE TO LHB, INC. AND CITY OF MINNEAPOLIS COMMENTS

In the Matter of a Commission Inquiry into Privacy Policies of Rate Regulated Energy Utilities
Docket No. E, G-999/CI-12-1344

Dated this 4th day of April, 2014.

/s/Andrew P. Moratzka
Andrew P. Moratzka

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