



OEB Green Button - IWG

Independent (Industry-led) Working Group for the implementation of Green Button in Ontario

Co-Chairs: Eddie, Gary, Jeremy



IW/G - Agenda for Today

- OEB Staff – “Land Acknowledgment”
- Co Chairs - Gary, Jeremy, Eddie
- Administrative (how is this going to work)
- Review Sub Working Group Content
- Next meeting – September 14, 2023

Note: Requested OEB feedback on future needs for re- certification and Activities after Nov 1.

Administrative - General

- Etiquette. Be respectful and Asking Questions state company & name
- Next Meeting : Implementation Focused and Other priority items.

IWG document 2022 and OEB Response on OEB Website

<https://www.oeb.ca/consultations-and-projects/policy-initiatives-and-consultations/green-button-industry-led-working>

Regulation: See <https://www.ontario.ca/laws/regulation/r21633>

Regulation Tip of the Day “energy data” means any energy usage and account holder information identified in REQ.21.2.5t or REQ.21.2.6t in the NAESB ESPI standard **that is collected by the energy provider and made available to account holders in the normal course of the energy provider’s operations**, excluding any data collected in respect of projects that are being undertaken on a trial basis; (“données énergétiques”)

Questions to OEB



What the OEB is going to do with this committee after September and after Nov.

This is something that likely should be discussed between Co-Chairs and OEB staff on the basis of what Co-Chairs have been told by GB IWG members.

It is worth noting the scope of GB IWG when it was established was to support implementation of Green Button per the regulatory requirements that were put in place in 2021 and that have the deadline of November 1, 2023 to be fully implemented.

Questions to OEB



Are there rules about changes to the interface that require Re-Certification

OEB Response

The requirement in Ontario Regulation 633/21 (the Green Button Regulation) is as follows:

Certification

- 4. (1) Every energy provider shall ensure that its implementation of the requirements set out in subsection 25.35.8 (2) of the Act and in this Regulation is certified by the Green Button Alliance to its “Connect My Data” and “Download My Data” standards.
- (2) The certification described in subsection (1) must be obtained no later than two years after the day this Regulation comes into force, subject to any extensions granted under section 5.

Once a distributor has been certified consistent with Section 4 above, it is compliant with the regulation in this respect. While it is difficult to comment definitively on this question without more specific information, OEB staff’s view is that a distributor’s certification would remain valid unless there are any changes to its system(s) that would impact the existing certification.

OEB staff encourages distributors to contact the OEB via Industry Relations:

<https://www.oeb.ca/industry/contact-industry-relations>

User Experience Sub-Working Group (IUXWG) (Mondays)

- Co-Chairs Michael / Karen / Gary
- Separate Agenda / Discussion from Co-Chairs (Biweekly)
 - Discuss Implementation / Provide Best Practices recommendations, Q&A, Issues list
 - Note: Karen will be away for several weeks. Gary will assist until she is back.

Best Practice : Best Available Meter Data – **Non-Consensus** (6/15/23 at IWG)



LDCs shall provide electric and gas usage readings that (1) are up to date to the best of their knowledge at the time of transmission; (2) correctly use the QualityofReading attribute to denote reading quality; and (3) are updated to the Third Party as soon as possible when updates occur. This recommendation does NOT impose new metering, meter reading or validation, editing and estimation (VEE) requirements on LDCs, but rather ensures symmetry in the quality of usage information available to both LDCs and Third Parties.

Why?

- Third Parties need to know the level of accuracy of the usage data they received for decision-making and settlement.
- There is a need to strike a balance between 100% accuracy (which is impossible) and 0% accuracy (which is unworkable), recognizing the complexities of VEE
- This is not a prohibition on estimated readings. Estimated reads should be properly marked using QualityOfReading.

Reason(s) for Non-Consensus: Already assumed to be part of the implementation. No need for Best Practice

Best Practice: Best available billing data – Approved

6/15/23 by IWG



LDCs shall provide electric and gas billing data that (1) is consistent with the bills delivered thorough portals including e-billing (historically and into the future); (2) include all bill corrections & changes; and (3) are updated to the Third Party as soon as possible when updates occur. This recommendation does NOT impose new billing or metering requirements on LDCs, but rather ensures symmetry in the quality of bill information available from LDCs to Third Parties and account holders.

Why?

- Must be compliant with the Regulation and OEB guidance
- There is a need for high accuracy of billing information for decision-making
- Bills are required in normal business practices and are used as official receipt. Thus, the billing data provided via Green Button should be consistent with the “energy data” (as defined by Regulation) on the bills.
- Bill data is already used by 3rd parties and account holders and it is always assumed that the bill is the official receipt which is used for payment, auditing and informational / operations purposes.

Best Practice: Simple KPIs - Approved 6/15/23 by IWG

LDCs shall provide key performance indicators (KPIs) to OEB on a quarterly basis similar to the following:

- Number of third parties in the onboarding process
- Number of third parties that have completed all onboarding and are available to any customer
- Number of one-time customer authorizations via GBCMD (by usage / billing / account info)
- Number of ongoing customer authorizations via GBCMD (by usage / billing / account info)
- Number of account holders with one authorized Third Party vs. two or more

This is a best practice, not a requirement at this time. The expectation is that these should not be mandated by the regulatory deadline due to the time and effort involved to implement.

Why?

- OEB and the Ministry will want information to judge the utilization levels of GBCMD across the province.

Independent Utility only (IUWG) Sub - Working Group

- Co-Chairs Steve / Carrie / Warwick
- Separate Agenda / Discussion from Chair
 - Discuss Implementation / Provide Best Practices recommendations, Q&A, Issues list

Technical Sub-Working Group (ITWG)

- Co-Chairs Ryan / Don
- Separate Agenda / Discussion from Co-Chairs (Biweekly)
 - Discuss Implementation / Provide Best Practices recommendations, Q&A, Issues list

Best Practice - ITWG – Ontario Green Button Billing Line Items Naming – For Discussion

Best Practice Recommendation #14

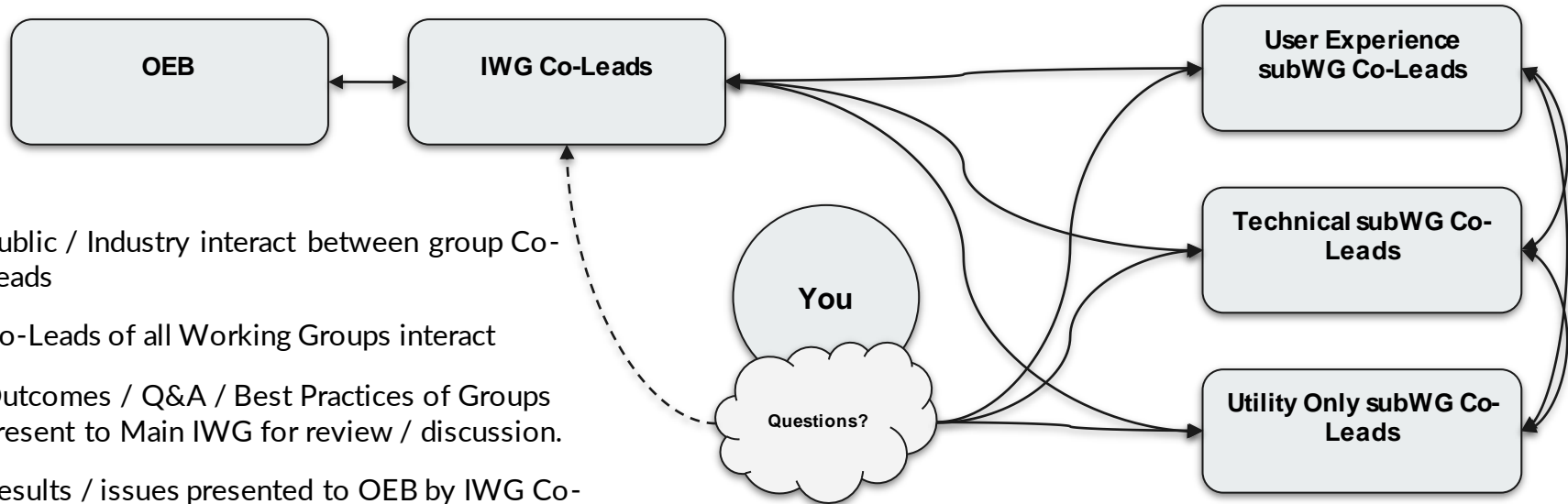
- ITWG participants believe bill item naming standardization should continue into the future for clearer understanding to 3rd parties
- ITWG has created a final version of the bill item mapping sheet to be shared with the public via the OEB
- ITWG recommends that the OEB take on the process of keeping this list updated with stakeholder input in the future, whenever new programs or pricing changes that affect most utility bills are rolled out in Ontario
- ITWG recommends that the OEB post this sheet for public consumption on the Green Button consultation page of the OEB website

*Note: this does not supplant or replace billing standards/regulations for individual utilities



Past IWG OEB Feedback on Implementation in 2023

2023 - Inter-Working Group Communications Review



- Public / Industry interact between group Co-Leads
- Co-Leads of all Working Groups interact
- Outcomes / Q&A / Best Practices of Groups present to Main IWG for review / discussion.
- Results / issues presented to OEB by IWG Co-Leads

Recommendation #7.2: offline authorizations

Approved

For customers without internet access, the Utility should establish both telephone and/or paper form-based processes whereby a customer can grant a data-sharing authorization (or revocation).

* In the case of telephone authorizations, Utility staff should assist the customer to meet the authentication and authorization requirements. (The intent of this recommendations is not to resolve or address the mechanism of bulk authorizations.)

* Telephone or paper methods will be available based on customer type following standard Utility practices. For example, Utilities may prescribe paper forms for large commercial customers but support telephone authorizations for residential customers.

Why?

- Green Button is a digital tool; however, we anticipate a small number of customers who do not have Internet access, will want to share their data with third parties. To ensure confidentiality and accountability in a telephone call, this is best handled by the Utility staff, who have access to the customer's information.
- Business customers may want to use paper forms to ensure that internal approvals are correctly obtained.

Question Raised to OEB by IWG

At the ITWG meeting there was discussion on Offline Authorization / suspension / removal of 3rd parties. The IWG was asked to look for clarification from the OEB

Are Utilities required to provide a service for GB where customers;

- Do not have access to the internet
- Do not have an online utility account or can't access it
- Want to authorize or remove third party(s).
- Want to authorize a 3rd party with multiple accounts

2 separate discussion items.

- Does the Utility need to have a process to service this group of users. e.g. manual process - the Utility validates user, provides, authorization / suspension on behalf of the Account holder. (e.g. call in)
- Since the standard does not provide this option, should the ITWG make recommendations for future versions of the Standard.

OEB Response / Questions?

Both the [Guidance Letter](#) issued on November 1, 2021 and the OEB Response to the GB IWG Report issued on November 22, 2022 advised that customers who wish to access their data or authorize a third party to access their data should be able to do so consistent with the Green Button Regulation, and **that distributors need to consider alternate authentication approaches to allow customers without an online account with the distributor to participate in Green Button.**

The OEB Response to the GB IWG Report further advised that should the GB IWG wish to continue to meet, establishing a uniform approach to such alternate pathways may be an area it wishes to focus on.

OEB Response / Questions continued

In relation to the question on the NAESB ESPI Standard, the version of the that standard that applies in Ontario is defined per Section 1 (2) in the [Green Button Regulation](#) as “the standard titled “REQ.21 Energy Services Provider Interface Model Business Practices”, version 3.3, **published on January 30, 2020** by the North American Energy Standards Board.” Section 2(2) of the Green Button Regulation requires energy providers to implement that version of the standard.

Further updates of the standard by NAESB would not become a requirement in Ontario without amendments to the Green Button Regulation.

There are questions related to 3.4 of the Regulation. IWG was requested to get OEB feedback.

Authorization 3.4 states

(4) Every energy provider shall, in accordance with such requirements as may be established by the Board, establish a policy regarding privacy of energy data.

Questions:

- Who is this privacy policy for?
- Is this something that flows down to the customer and 3rd party? If so, how is this enforced?
- Can a Utility require that the data stay in Canada or that the third party meets Canadian Privacy laws.
- Does the above put the obligation of enforcement on the Utility if it is a requirement?

This item received clarification and feedback was requested from the sub working groups.

OEB Response / Questions?

The OEB's [Green Button Guidance](#), issued November 2021, speaks to privacy being the distributor's own privacy policy. Further, a distributor does not necessarily need to create a separate policy for GB just that it's existing policy should reflect GB, as relevant.

Per Section 3 (4) of the GB Reg. must be provided in electronic format to the customer when it authorizes (OEB envisages this to be via a link at authorization time).

The Guidance also states that it would generally not be a distributor's role to monitor the behaviour of a third party once the customer agrees to share their data with the third party. Rather, it is the third party's responsibility to manage the data under its own privacy policies and legal or regulatory requirements.

The [Industry Relations](#) process is also available for parties that have questions related to the Reg. / GB requirements.



IWG

Thank you for your participation

To reach out to the Co-Chairs - Email us

