

Green Button Industry-Led Working Group Meeting #1

1:30 – 3:30 p.m.
December 2, 2021

Agenda

- 1:30 – Welcome and logistics
- 1:45 – Presentation: Guidance / Green Button Regulation
- 2:30 – Break
- 2:45 – Presentation: GB IWG Structure and Discussion of Next Steps
- 3:30 – End

Green Button in Ontario

Status Snapshot / Green Button Timeline

Milestone	Date
O.Reg. 633/21 (the “Green Button Regulation”) posted	September 2, 2021
Green Button Regulation takes effect	November 1, 2021
OEB Guidance, Accounting Order, Amendments to Retail Settlement Code (RSC) issued	November 1, 2021
First GB IWG meeting	December 2, 2021
Template for reporting on GB implementation Issued	(Early) January 2022
First reporting due on GB implementation	February 28, 2022
GB implementation in Ontario to be completed	October 31, 2023

Green Button Consultation to Date

- Ministry of Energy consultations on its plans to introduce a Green Button regulation were held Spring, 2021. Ministry requested OEB help to support electricity and natural gas sector preparedness for implementation of Green Button
- OEB initiated Green Button Task Force meetings to solicit feedback from electricity and natural gas distributors (utilities) and other stakeholders on what guidance or direction is required from the OEB in order for utilities to begin implementation of Green Button
- Task Force members selected to represent diverse nature of electricity and natural gas sector in Ontario. OEB Staff listened to feedback from utilities and other stakeholders on what guidance or direction is required from the OEB in order for utilities to begin implementation of Green Button
 - Discussions focused on identification of types of information that should be available through Green Button
 - Experience in other jurisdictions that have implemented Green Button
 - The final Regulation was reviewed with task force members at the September 2, 2021 meeting, the same day it was posted.

Summary of the Regulation

- Utilities must ensure that their implementation of the requirements of the regulation has been certified by the Green Button Alliance to both its “Connect My Data” and “Download my Data” standards by November 1, 2023, subject to any extensions granted by the OEB (i.e., the Utilities have a two-year transition period)
- The following utilities are exempted from the requirement to implement GB: Hydro One Remotes, Cornwall, and the First Nations power corporations (Attawapiskat, Fort Albany, Kashechewan), OM Limited Partnership (gas) and any gas distributor qualifying for an exemption under O.Reg 161/99 s.3 (distributing less than 3M m³ per year)
- Utilities will be required to provide any energy usage and account holder information that is collected by the utility and made available to customers in the normal course of utility operations in Green Button format to account holders and third-parties authorized by account holders to access the information
- Utilities must make 24 months of data available (where available) to account holders and third-parties authorized by account holders to access the information
- Utilities must develop a process to enable account holders to submit and revoke authorization for access to their energy data. Utilities must also develop and provide electronically to account holders a policy regarding privacy of energy data. Both the authorization process and the establishment of a privacy policy may be subject to requirements established by the OEB
- Utilities may, subject to any requirements established by the OEB, terminate any authorizations for access to data where a significant violation of the terms and conditions under which access to the data has been granted
- The regulation allows the OEB to extend the time period by which a utility would be required to comply with the proposed requirements for technical, operational reasons that cannot be addressed at a reasonable cost

Selected Guidance (Issued November 1, 2021)

	Guidance
Energy Data	The Green Button Regulation applies to any energy usage and account information identified in the NAESB ESPI standard that a given distributor makes available in the normal course of the distributor's operations
	To the extent that a distributor's normal practice is to make certain energy data available only to a given class of customers, that data need not be made available in Green Button format to customers in other classes.
	If future developments in the electricity or natural gas sectors result in additional data being made available to customers in the normal course, that data will also need to be made available in Green Button format.
Customer Authorization	Authorization should only occur after a customer has gone through an authentication process to verify that they are the account holder. Distributors should also consider alternate authentication approaches for customers without an online account with the distributor
	Distributors should make the authorization form as simple as possible, and the form should only require such information as is reasonably necessary (i) to process the authorization; and (ii) for the customer to understand the choice they are making to download or share their data.
	The authorization form should include a clear statement to the effect that the customer is about to authorize the sharing of its energy usage and/or account information with a third party and that questions relating to the agreement between the customer and the third party, including how the third party will deal with their energy data, should be directed to the third party.
	The authorization form and process should be mobile optimized where it is cost effective to do so.
	The authorization form should advise the customer that the third party will continue to have access to their data until such time as the customer revokes the authorization.
	The authorization form should advise the customer that they can revoke the authorization at any time – with a link to information on how to revoke authorization.
	The authorization form should inform the customer of the scope-of-use, to be provided by the third party, in relation to the data to be shared with the third party.
Termination of Authorization	OEB staff notes 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.
	OEB staff also notes the need to ensure that the process for termination does not discourage the participation of third parties in Green Button through overly restrictive or unduly punitive terms and conditions between distributors and third parties.
Reporting Requirements	Quarterly Reporting on implementation – template to be used for reporting to be shared early January

Questions?

Green Button Industry- Led Working Group

Origin of Industry-led Working Group (IWG)

- Some task force members (i.e., from the GB Task-Force that ran July to September) suggested, and others agreed, that an industry-led working group during the implementation period would be beneficial for parties (utilities, their vendors and third parties) to discuss / resolve potential issues identified during implementation or facilitate industry discussion in areas such as:
 - Consistent treatment of Ontario-specific data that may not be specifically included in the Green Button Standard (e.g., breakdown of delivery cost data like fixed / variable distribution or transmission rates and rate-riders) with free-form fields in the Standard
 - Help to establish metrics related to user experience (e.g., system availability up-time / down-time) that could impact customer or third-party access to the data
 - Ensure that Green Button in Ontario meets industry and customer needs as sector evolves and continues to innovate
- The task force also suggested interest in such a working group could be canvassed as part of the process for commenting on draft guidance
- OEB staff suggested that an industry working group would be useful to address certain issues that are more technical and perhaps industry specific issues as well as identifying new potential areas for OEB direction
- Staff suggested it would facilitate the standing up of a working group and support it through ongoing OEB staff involvement as an observer

Purpose of GB IWG

- To support distributors and their IT service providers (vendors), during the implementation period with participation from third parties, consumer groups and other interested stakeholders
 - The working group will further explore Green Button areas around implementation that were raised by stakeholders in GB Task Force meetings, as well as areas OEB staff identified in its letter of November 1, 2021
 - The working group will also serve to address issues that arise as distributors go through the process of implementing Green Button in accordance with the Green Button Regulation
- The GB IWG is intended to focus on the GB elements required to be implemented by distributors within the 2-year timeframe

GB IWG Meetings

- Subsequent GB IWG meetings will be run by the industry. As membership of the GB IWG necessarily needs to include distributors and their vendors, it makes sense that the working group be led by entities directly involved in implementation activity
- Given the implementation timelines, the GB IWG is anticipated to meet once per month but the frequency may change in response to the needs of the GB IWG members and in recognition of the stakeholders' interest and involvement in other applications and processes before the OEB
- Meeting agendas should be set by industry, in consultation with GB IWG members
- All meeting materials will be posted on the OEB's website to allow stakeholders to follow the GB IWG's progress

Role of Co-Leads

Co-Lead Responsibilities

- Co-Leads are to be chosen by the GB IWG based on nominations received from GB IWG members
- Establish and maintain a pace of work to adhere to the two-year implementation timeline as set out in Green Button Regulation
- Develop meeting schedules and agendas
- Moderate GB IWG meetings – guide, support, and advance collaborative discussions and make reasonable effort to help reach group consensus on issues
- Facilitate, delegate, and otherwise assist in the development of preparatory materials and GB IWG written recommendations by, among other things:
 - Assigning work to GB IWG members, as required
 - Reviewing draft materials prepared GB IWG members
- Work with OEB staff to obtain OEB guidance and direction to address emerging and/other developments, when necessary

Role of OEB Staff

- Attend all GB IWG and any sub-working group(s) meetings
- Support the GB IWG Co-Leads where necessary with guidance on meetings and posting meeting materials on the OEB's website
- Provide the OEB leadership with periodic updates on the overall progress of the GB IWG

Prioritization of Items to Focus on

- From the GB TF meetings through the summer and the feedback received following the issuance of draft guidance for comment in October, the following areas appear have potential for discussion via the GB IWG:
 - **Energy Data**
 - Data required by third-parties
 - Data available by most utilities
 - **Termination of third-party access to data by utilities**
 - **User Experience** (both from customer and third-party perspective)
 - Note: this could include discussion of performance standards
 - **Other?**
- GB IWG Members – what areas are you most interested in discussing?

Next Steps

- GB IWG to submit nominations for role of Co-Lead roles by December 9, 2021
- OEB staff to facilitate process for GB IWG member selection of Co-Leads based on nominations submitted by December 17, 2021
- Suggested next meeting dates:
 - Meeting #2 week of January 17
 - Meeting #3 week of February 14

Questions?