

# Green Button Implementation Task Force Meeting 7 EB-2021-0183

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1:30 – 3:30 p.m.  
September 2, 2021

Includes suggestions from task force members as  
shared at the meeting

Note - summary of feedback from task force members in this  
presentation does not necessarily reflect the views of OEB staff

# Meeting #7 – Areas for Discussion

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- Ministry update on regulation (note [regulation](#) posted morning of September 2, 2021)
- Overview summary of task force feedback received to date:
  - Energy Data
  - Customer Authorization of Third Parties
  - Termination of Authorization
  - Privacy Policies
  - User Experience
  - Other Feedback
- Next steps and future meetings

# Energy Data

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- Feedback from task force meetings:
  - Utilities asked if the OEB could provide a list of data elements required
    - ENERGY clarified that utilities will only be required to provide information that they collect and provide to account holders in the normal course of operations and that the draft regulation did not provide authority for the OEB to determine what data elements would / would not be included
  - Billing and meter data should not be a problem for most utilities to provide, other data elements (e.g. service point) may require additional time to implement
  - The current customer information system for one vendor, who provides services to several utilities, is not currently able to support GB. The vendor has, however, committed to supporting GB and is looking at a solution. Utilities are also looking at whether to procure a new vendor in the event a solution is not possible.
  - To support demand response programs less than hourly intervals would be useful, which is dependent on individual utilities' advanced metering infrastructure capabilities. Some utilities are able to provide 15-minute or 5-minute intervals, while others can only provide hourly at this time
  - How often will this information be provided (latency) 5 minutes after period would be great (res – every 4 hours, CNI – midnight of previous day, some CNI every hour GA customers with a fee, IOT devices tested in near real time – every minute testing / POCs still developing)

# Sample energy data points for discussion (elec)

(note: highlighted elements suggested by task force members in the meeting and require additional information to determine whether relevant in the Ontario context)

Customer Usage Information	Customer Account Information
Usage Point ID-Universal Unique Identifier	Usage Point ID-Universal Unique Identifier
Previous read & current read - dates and meter readings (plus clear identifier of unit of measure included in GB standard)	Meter number
Current reading type (e.g. actual / estimate) and quality of reading and any additional information on reading type	Account number / premise number
Billing period – start / end dates and times (bill type – adjusted / final)	Account name
Overall consumption for period (plus historical usage summary)	Service address
Overall consumption last billing period	Mailing address
Data by hourly interval (or less) with associated cost per kWh (TOU or tiered) / kWh	Customer contact information
Total bill amount for period / add equal billing payment plan (plus PDF copy of the bill?)	Customer rate class (or is this usage info?) / unique customer identifier
Global Adjustment (Class A, Class B, retailer customer)	Information necessary to participate in DR / other programs (peak demand factor? – PEF factor for class A customers)
Delivery charges (broken out by fixed and volumetric where possible)	TOU / tier or Class A/B or GS<50/GS>50
Regulatory charges (broken out by item where possible)	
Rate riders if delivery charges broken out	Gross-load billing information
Ontario Energy Rebate (for residential, GS<50)	Meter multiplier / power factor (secondary or primary) / loss adjustment factor (plus whether added on the meter or not)
HST	IESO Control Group
Utility supplier information (name, market participant ID, other, retailer – may be referenced as “agreement association” in standard and include retailer billing information)	Net metering / FIT / MicroFIT
Previous consumption / billing history up to 24 months for new requests	For accounts with one account number but multiple premises, access data for all accounts with one authentication?

# Customer Authorization of Third Parties

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- Feedback from task force:
  - Customer authorizations should involve informed consent, key information visible with links to additional information
  - Suggested the OEB should provide a specific format for the authorization to ensure consistency across all utilities
  - Customers without an online account should be able to authenticate through an alternate method in order to authorize a third party
  - Information on authorization should be clear, concise and not overwhelming for the consumer balanced with need for informed consent and not being unduly restrictive on third parties
  - Customer should be able to revoke authorization in as many ways as possible that can be retained
  - Some task force members would like to have a central body doing third-party certification to vet any third parties who want to provide GB-derived services and maintain a list of good / bad actors. Some third parties did not agree with this suggestion.
    - ENERGY confirmed this is not provided for in the draft regulation
  - Differing views on whether paper authorization should be made available - should be provided if asked for by the customer; how to authenticate; if provided for, should be sent in by customer, not third party; may be too much of a barrier if required to be sent by customer vs allowing third party to do so

# Termination of Authorization

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- Feedback from task force:
  - Suggested there should be a central body to determine whether a third party's authorization should be terminated (blacklist / whitelist) and provide direction to the utility / utilities.
    - ENERGY confirmed that this is not provided for in the draft regulation
  - Utilities shouldn't be required to "police" the behaviour of private sector as the data is not the utility's data, it is the customer's data
  - Customer accepts terms and conditions from the third party and the issue should be between the two
  - If utilities did / didn't terminate, are there liability issues for utilities, either from a third party or customer?
  - Suggest that the OEB should provide a standard terms and conditions along with a list of what is / isn't a "significant violation" and set up rules for termination
  - Still needs to be a complaint process where a dispute exists (e.g. like retailers), suggested need a neutral "investigator", utilities potentially have a conflict of interest if also offering GB apps
    - OEB noted that, unlike retailers that are licensed by the OEB, the OEB does not have any authority over third parties
  - Customer authorization should last until data is verified and any DR settlement is finished

# Privacy Policies

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- Feedback from task force:
  - Utilities will need to review their privacy policies
  - Privacy policies will need to be simple and easy to read
  - It's not the utilities' responsibility to ensure the privacy of customer data after the customer has agreed to the third party's terms and conditions and authorized the sharing of their data
  - Utilities are only responsible for the data while it's in their own system
  - Utilities are not liable as they are not owners of the data but are only data custodians
  - The Green Button standard provides that third parties should delete data after a certain amount of time to minimize potential for breaches. Authorization can be tied to a specified purpose, once the agreed-upon purpose has been fulfilled then data should be rendered inaccessible
  - However, no way to ensure that the third party deletes data after authorization is revoked
  - Provincially and municipally owned utilities are required to adhere to FIPPA or MFIPPA. Privately owned utilities and third party service providers would be required to adhere to PIPEDA requirements for privacy of data
  - **Federal requirements related to privacy have been proposed which may impact the Green Button standard if approved, will need to consider**

# User Experience

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- Feedback from task force:
  - The authorization process should be mobile-friendly where possible
  - User experience metrics are useful for arbitrating disputes between a utility and a third party when there is disagreement as to system/GB implementation performance
  - If there are eventually going to be binding metrics, they should be established at the beginning as it will need to be incorporated during implementation – expensive to add later
  - Utilities already have a scorecard; the scorecard is not binding and can be used for utilities to report their performance on user experience metrics
  - Communication with third parties is more important for now rather than uptime metrics
  - OEB should provide guidance around metrics but not establish requirements at this time



## Other Feedback

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- With implementation set to begin in the fall, what should the OEB's role be with respect to monitoring progress by utilities?
- How might issues that arise during implementation best be raised and addressed?
- Is there interest in the industry pulling together an ongoing working group to address **business and** technical issues that arise during implementation (on which the OEB could participate)?
  - **Several task force members suggested that, similar to the EBT working group, OEB could initiate the first meeting and call for participants, the industry can take this forward. Issues that arise, per question above, could be identified through this working group and raised with the OEB**
- Do task force members have any remaining questions or comments regarding GB implementation or areas where guidance is required from the OEB?
  - **Need to give consideration to how we foresee Ontario's role in growing the GB standard including use cases that support our future needs**

## Next Steps

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- Once regulation has been posted (posted September 2<sup>nd</sup>), OEB to review in tandem with feedback from task force members and determine appropriate guidance or requirements to support utility implementation of Green Button
- OEB to issue any draft guidance / requirements for stakeholder comment
- Schedule task force meeting to review draft guidance / requirements and obtain feedback