



November 1, 2022

Via E-Filing

Pennsylvania Public Utility Commission,
Attention: Secretary Rosemary Chiavetta
400 North Street
Harrisburg, PA 17120

Docket No. M-2021-3029018

Re: Investigation into Conservation Service Provider and Other Third Party Access to
Electric Distribution Company Customer Data

Dear Secretary Chiavetta:

Keystone Energy Efficiency Alliance would like to thank the Pennsylvania Public Utility Commission (“PUC”) for this opportunity to provide comments in support of the Conservation Service Provider (“CSP”) and Other Third Party Access to Electric Distribution Company (“EDC”) Customer Data.

Keystone Energy Efficiency Alliance (“KEEA”) is a trade association for the energy efficiency industry in Pennsylvania, which is composed of a diverse range of professions—from contractors and manufacturers to engineers, architects, and software developers—and a local workforce that cannot be outsourced. Together with its sister organization, the Energy Efficiency Alliance of New Jersey (“EEA-NJ”), KEEA represents 75 business members who provide energy efficiency products and services in support of an industry that accounts for more than 65,000 Pennsylvania jobs. Our membership is large and diverse, with experience designing and implementing a variety of demand side management solutions and energy efficiency (“EE”) programs across the globe. KEEA champions efficiency as the foundation of a clean, just, and resilient energy economy. KEEA's vision is that energy efficiency anchors all efforts to meet our ongoing energy needs, improve health and comfort, promote energy equity, and protect our climate.

KEEA appreciates all of its work the PUC and staff have put into data access in order to create a solid foundation to develop greater energy saving. KEEA has focused our comments and recommendations on ensuring the expansion of data access that is accessible, secure, and efficient to advance energy savings for Pennsylvanians.

9. What specific customer electric usage data do other parties believe EDCs should have available to reasonably be released to 3rd parties?

KEEA supports expanded access of data to third parties to encourage greater market innovation and participation. In our previous comments we called on the PUC to explicitly define “unshareable data” to include bank account numbers, social security numbers, and credit/debit card numbers. This would help protect customers and is not needed by Energy management companies to render their services.

KEEA would recommend EDC's release usage and demand measurements, as close to real-time as possible. By providing the data in this manner, third parties will be able to more competitively participate in the marketplace and empower customers to be better able to control their energy usage and costs. Moreover, the use of anonymized customer data will also provide for growth in this space. KEEA would encourage this information to include marginal emissions data, customer usage associated with customers with specific attributes, such as service class, service voltage, location, building type, distributed energy resources (DER), and EV adoption to the extent that such information is available. An increased access to data will create new job opportunities, lead to the development of new products and services, and help create more flexibility of the grid.

KEEA appreciates this opportunity to provide comments on implementation data access to CSP's and Other Third Parties.

Respectfully submitted,



John M. Kolesnik, Esq.

Policy Counsel

Keystone Energy Efficiency Alliance