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July 22, 2025

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Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17120

**RE: Act 129 Energy Efficiency and Conservation Program - Phase V
Docket No. M-2025-3052826**

**Data Sharing Working Group - Request for Clarification of Staff
Action**

Dear Secretary Homsher,

The Keystone Energy Efficiency Alliance submits the following comments and recommendations regarding the Pennsylvania Public Utility Commission's (hereinafter "Commission") Phase V Final Implementation Order.

The Keystone Energy Efficiency Alliance (hereinafter "KEEA") is Pennsylvania's trade association for the energy efficiency industry. With our sister organization, the Energy Efficiency Alliance of New Jersey, we represent over 70 business members across Pennsylvania and New Jersey. Our mission is to champion efficiency as the foundation of a clean, just, and resilient energy economy.

On June 18, 2025, the Commission issued the Phase V Final Implementation Order establishing a data sharing working group charged with making recommendations to the Commission regarding Act 129-related data sharing policies and procedures, and further ordering that the Bureau of Technical Utility Services and the Bureau of Consumer Services convene a stakeholder working group within 45 days to explore issues related to data sharing. Pursuant to this order, the Commission issued a Secretarial Letter on July 11, 2025, scheduling an initial meeting of the working group focusing on understanding the needs and types of data requested to be shared by and



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among the relevant agencies and electric distribution companies (hereinafter “EDC’s”). Relevantly, this meeting will only involve the EDC’s, the Department of Environmental Protection, and staff of the Commission. No information regarding future meetings or engagement by additional stakeholders was included in the letter.

KEEA is concerned that the Commission’s decision to limit broader stakeholder engagement in this initial meeting contradicts the original intent in forming this group, which was to have broad stakeholder engagement from a variety of interested parties. In an increasingly interconnected and data-driven energy landscape, access to and sharing of energy data are critical for optimizing conservation programs, enhancing grid reliability, and ensuring that Act 129 funds and external funding sources are effectively leveraged. At the same time, concerns around transparency and security regarding data collected from consumers and ratepayers militates in favor of taking steps to ensure that appropriate safeguards are in place to protect consumer/ratepayer data.

These concerns are especially significant given that the types of data that should be shared across program administrators, requirements for customer consent to have potentially sensitive information shared, and guidelines for third-party Conservation Service Providers collecting and utilizing customer data are intended to be discussed. Given that these data-sharing policies will have broad effects on how consumer data will be collected and utilized, the Commission should likewise receive input from a broad array of stakeholders, rather than limiting the very foundation of this project to EDC’s and relevant agencies. We are aware that other stakeholders have raised these and similar concerns regarding the lack of transparency and input.

KEEA respectfully requests that the Commission clarify its intended process to include a transparent and inclusive process for stakeholders to engage in critical policy discussions regarding the data sharing working group.

Respectfully submitted,

Keystone Energy Efficiency Alliance


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