

June 10, 2026

***VIA ELECTRONIC FILING***

Matthew Homsher  
Public Utility Commission  
Commonwealth Keystone Building, 2nd Floor  
400 North Street  
Harrisburg, PA 17120

**RE: Distributed Energy Resources Participation in Wholesale Markets, Chapter 57, Docket No. L-2023-3044115**

**I. Introduction and Overview of Comments**

UtilityAPI respectfully submits its comments in response to the December 18, 2025, Notice of Proposed Rulemaking (NOPR) Order<sup>1</sup> issued by the Pennsylvania Public Utilities Commission (Commission) regarding the implementation of distributed energy resource (DER) aggregations or DERAs pursuant to Federal Energy Regulatory Commission (FERC) Order No. 2222.

UtilityAPI is a software company whose flagship product, the Utility Data Exchange (UDX), is deployed by over 20 North American utilities to allow their customers to share energy usage data with the third parties they choose.<sup>2</sup> Our Consumers Energy deployment recently received the highest score of those ranked in the Green Button Scorecard published by the Mission:data Coalition.<sup>3</sup> While we deliver solutions in partnership with electric and gas utilities, our success comes from also working closely with

---

<sup>1</sup> Published in the Pennsylvania Bulletin on April 11, 2026.

<sup>2</sup> Selected implementations are available at:

Consumers Energy: <https://greenbutton.consumersenergy.com/>

Eversource: <https://usagelink.eversource.com/>

National Grid: <https://www.nationalgridus.com/Upstate-NY-Home/Ways-to-Save/Green-Button-Connect>

American Electric Power: <https://greenbutton.indianamichiganpower.com/>

<sup>3</sup> Mission:data Coalition, Green Button Scorecard (March 31, 2026) 4, available at [https://static1.squarespace.com/static/52d5c817e4b062861277ea97/t/69cb41b79ae3db719f2c0b70/1774928311958/Missiondata\\_2026+Green+Button+Scorecard.pdf](https://static1.squarespace.com/static/52d5c817e4b062861277ea97/t/69cb41b79ae3db719f2c0b70/1774928311958/Missiondata_2026+Green+Button+Scorecard.pdf).

---

DER providers and the customers they serve. This gives us a unique, 360-degree view of how data tools are implemented and used.

Over the last decade, UtilityAPI has been engaged in numerous state regulatory proceedings about the policies and technologies necessary to make interval energy data accessible for diverse use cases, including project sizing, program enrollment, and real estate management. Specifically regarding DERAs and virtual power plants (VPPs), our staff have presented at technical conferences on the role of electronic, authorized data-sharing in the context of Order 2222 implementation in New Jersey and Maryland.<sup>4</sup>

We applaud the Commission for continuing to prepare for Order 2222, as the compliance deadline of February 2, 2028, is fast approaching. However, the draft rules lack language necessary to effectuate the development of DER aggregation at scale. Significantly, the Commission defers the critical issue of access to interval meter data for DERAs to be addressed through the Electronic Data Exchange Working Group (EDEWG).<sup>5</sup> The EDEWG focuses on the implementation of Electronic Data Interchange (EDI) to facilitate retail supplier transactions.<sup>6</sup> While the implementation of EDI in Pennsylvania is generally well-regarded thanks to the efforts of the Commission, the electric distribution companies (EDCs), and the many stakeholders participating in the EDEWG, EDI alone will be insufficient to scale DER aggregation. Previous comments in this Docket have described EDI infrastructure as unprepared for the volume, speed, and security needs of Order 2222, and our comments provide additional information on its limitations.<sup>7</sup>

---

<sup>4</sup> New Jersey Bureau of Public Utilities, Docket No. EO24020116 (January 2025 Technical Conference); Maryland Public Service Commission, Case No. 9778 (December 2025 Technical Workshop).

<sup>5</sup> NOPR Order at 49-50.

<sup>6</sup> More information is at <https://www.puc.pa.gov/filing-resources/issues-laws-regulations/electronic-data-exchange/>.

<sup>7</sup> Comments of the DER Task Force (May 29, 2024) at 28.

---

Fortunately, there is a straightforward solution to this problem. Similar to steps in progress in Maryland and New Jersey, the Commission can establish rules directing EDCs to implement an off-the-shelf “data exchange platform” that enables secure, frictionless, electronic sharing of customer data with third parties, at the customer’s election. UtilityAPI respectfully requests that the Commission rescind its direction to the EDEWG and instead promulgate rules that would resolve outstanding issues about the scope and mechanics of how interval data is shared between EDCs and DERAs.

Our comments focus on technical and practical issues. First, we describe the key features of a data exchange platform and the many use cases it can enable, including but not limited to Order 2222 compliance. We recommend that a data exchange platform be certified to the most up-to-date version of the Green Button Connect My Data™ (Green Button Connect) standard by the Green Button Alliance, and incorporate other best practices.<sup>8</sup> Second, we identify the limitations inherent in the use of EDI for data-sharing at scale, and why it is reasonable to supplement EDI data flows with a data exchange platform. Far from being duplicative, EDI and Green Button Connect are different approaches for sharing data which can both be deployed to improve the efficiency of multiple use cases. Finally, we offer brief procedural suggestions to support an efficient process moving forward.

## **II. Features of a Data Exchange Platform**

UtilityAPI is a technology provider that specializes in the deployment and ongoing management of data exchange platforms throughout North America. A data exchange platform is a software solution that centers customer privacy and choice while facilitating DER markets and bill management. It involves three primary actors—utility customers, third parties, and utilities—and Fig. 1 shows how those entities interact to request, authorize, and transfer relevant data.

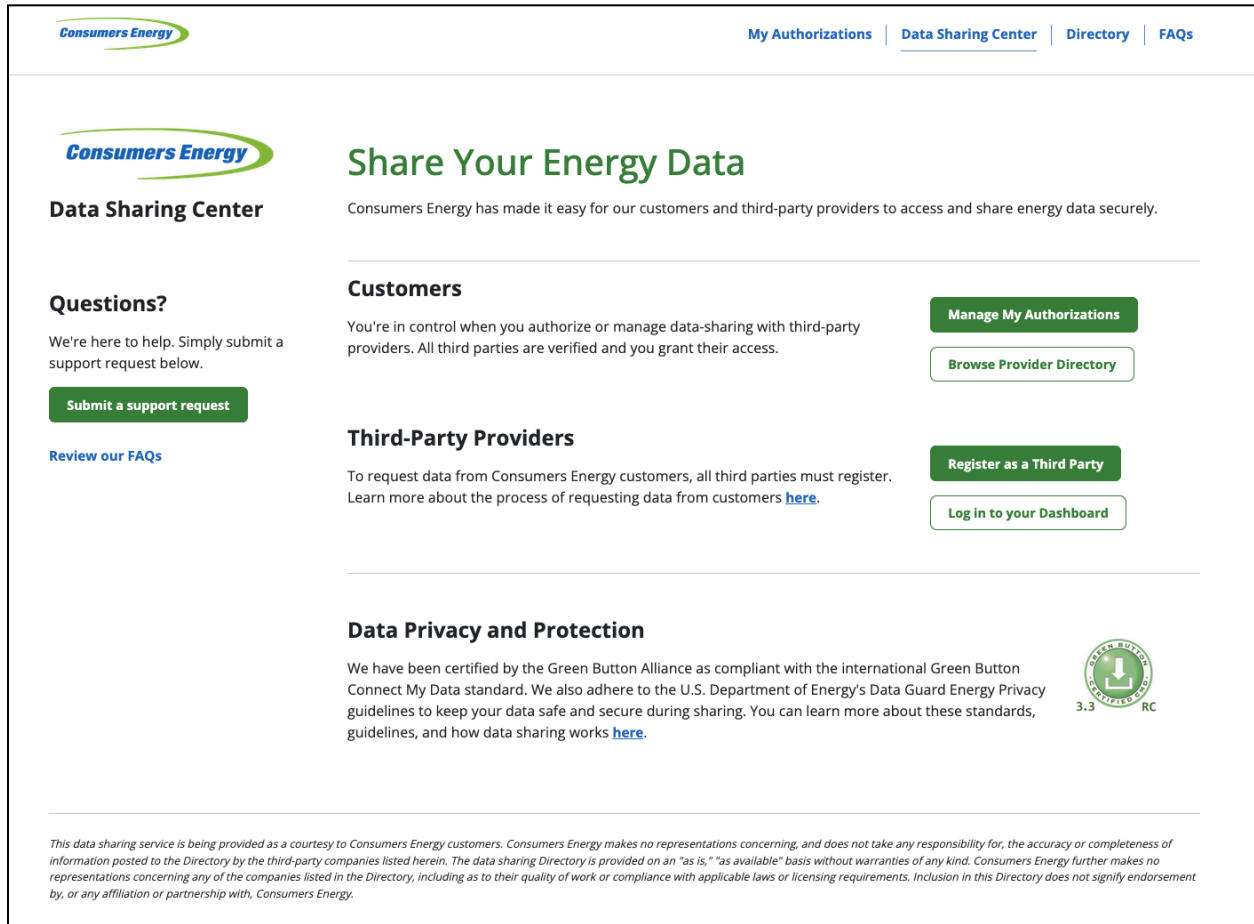
---

<sup>8</sup> Please visit: <https://www.greenbuttonalliance.org/>.



**Fig. 1: Interactions Between Users of a Data Exchange Platform**

Fig. 2 provides an example of a web-based interface for a working data exchange platform.



The screenshot shows the 'Data Sharing Center' page for Consumers Energy. At the top, there are navigation links for 'My Authorizations', 'Data Sharing Center', 'Directory', and 'FAQs'. The main heading is 'Share Your Energy Data'. Below this, there are sections for 'Customers' and 'Third-Party Providers', each with descriptive text and action buttons like 'Manage My Authorizations', 'Browse Provider Directory', 'Register as a Third Party', and 'Log in to your Dashboard'. A 'Data Privacy and Protection' section mentions certification by the Green Button Alliance. A footer contains a disclaimer about the data sharing service.

**Fig. 2: Example of an Online Interface for a Data Exchange Platform<sup>9</sup>**

The concept of a data exchange platform is not new (see Table 1). Platforms of this type and with versions of these features have been deployed by utilities in California, New York, and Texas for over a decade. A second generation of more advanced deployments is now emerging in states like Illinois and Massachusetts. Given the long history, these deployments have generated significant lessons learned about design practices that make the platform optimally useful for utilities, third parties, and their mutual customers.

<sup>9</sup> Available at <https://greenbutton.consumersenergy.com/>.

State	Involved Utilities	Data Exchange Platform Status
California	Pacific Gas & Electric San Diego Gas & Electric Southern California Edison	Utilities implement individual “Share My Data” platforms pursuant to tariffs, <sup>10</sup> with discussions about consolidating platform design occurring at the California Public Utilities Commission and the California Energy Commission.
Illinois	Commonwealth Edison	In its Multi-Year Integrated Grid Plan, ComEd entered a memorandum of understanding with Joint Non-Governmental Organizations committing to develop an “integrated data platform” including GBC functionality, grid data, rate data, and other information. <sup>11</sup>
Massachusetts	Eversource Energy National Grid Unitil	Pursuant to the 2024 Climate Act, Massachusetts electric distribution companies (EDCs) filed plans for a multi-utility platform that builds on their current GBC implementations in February 2026. <sup>12</sup>
New York	Con Edison	In a recent rate case, ConEd reported that its investments in a GBC platform and other electronic data-sharing tools saved conservatively \$1.4 million in operations costs for pulling data <i>just once</i> for over 70,000 customers. <sup>13</sup>
Texas	American Electric Power CenterPoint Energy Oncor Electric TNMP Company	SmartMeterTexas is jointly operated by utilities and enables customers to share data with retail electric suppliers and other third parties, processing hundreds of requests daily. <sup>14</sup>

**Table 1: Summary of Leading Data Exchange Platforms (Implemented and Emerging)**

<sup>10</sup> Example: Pacific Gas & Electric, Share My Data, <https://www.pge.com/en/save-energy-and-money/energy-usage-and-tips/understand-my-usage/share-my-data.html>, and Electric Rule No. 25, Release of Customer Data to Third Parties (last visited December 17, 2025), available at [https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC\\_RULES\\_25.pdf](https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_RULES_25.pdf).

<sup>11</sup> Illinois Commerce Commission (ICC), Dockets No. 22-0486/23-0055/24-0181 cons., Memorandum of Understanding between ComEd and the Joint Non-Governmental Organizations (filed May 23, 2024), available at <https://www.icc.illinois.gov/docket/P2022-0486/documents/350981/files/613798.pdf>.

<sup>12</sup> Massachusetts Department of Public Utilities, Docket No. D.P.U. 26-20, 26-21, and 26-22, Advanced Metering Infrastructure (AMI) Central Data Respository Implementation Plan (February 18, 2026), available at <https://fileservice.eea.comacloud.net/V3.1.0/FileService.Api/file//aeiigfacj?f7bJF6Cq/GWQ+TYLktotva2sCSWgooFb4RbJ6xIxlh+PcSxI+blU344Kxhmq+qpOeg0hKFj9M9I/xOR8+/8GqPvdGgrFe6XR6ngIfa80wd3rxFD8G4j981M2Rna9aVTXA>.

<sup>13</sup> New York Public Service Commission, Cases 25-E-0072, 25-G-0073, Consolidated Edison Company of New York, Inc., Rebuttal Testimony of the Information Technology Panel (filed June 2025) at 156-160.

<sup>14</sup> SmartMeterTexas is available at <https://www.smartmetertexas.com/home>.

---

Based on the examples in Table 1 and our experience as an implementer, a modern data exchange platform incorporates three necessary features that allow customers, third parties, and utilities to securely interact:

1. **Third-Party Registration.** The platform should allow third parties like DER aggregators to register so that they can be reviewed and approved to request customer data through the platform. The registration process should segment third parties from a risk management perspective, based on categories like use case and volume of transactions, and promptly vet them for business legitimacy and security.
2. **Customer Authentication and Authorization.** The platform should use technology-industry best practices to ensure that customers properly authenticate their identity and consent for their data to be shared from the utility to the third party without sharing their online utility username and password. Customers should also be able to authorize data-sharing within a third party's end-to-end experience, such as a website or app. This prevents unintended customer dropoff before the authorization process is complete.
3. **Data Availability.** The platform should make available the data that is needed for key use cases. For example, if the platform is intended to facilitate load flexibility, it should be capable of sharing interval energy usage data and customer rate class and clearly denote factors like whether data is raw or revenue-quality. This data should be available within seconds after a customer completes their authorization, allowing third parties to perform actions based on the customer's data—like advising them on potential programs—while the customer is still interacting with the third party. Ultimately, by standardizing data, a third party that has integrated with one data exchange platform can quickly adapt to integrate with another data exchange platform hosted by a different utility, increasing their reach without increasing costs.

Many of these core features will be enabled if the data exchange platform is certified by the Green Button Alliance to the most recent version of the Green Button Connect standard. Green Button Connect is a suite of standards and protocols that enable data which may come from different utility systems (customer information systems, meter data management systems) to be translated into a standard format and shared only with authorized entities using banking-grade information security practices. While some Pennsylvania utilities offer Green Button “Download My Data,” this is simply the ability for a customer to download a particular document from their online account, a process that will not support ongoing data exchange for wholesale markets.

While certification to the latest Green Button Connect standard is a critical step to ensure the

platform is structured appropriately, there are nuances. The Green Button Alliance recommends that an implementation be accompanied by certain policies and best practices, but it does not dictate which path regulators should take. For example, the Green Button standard does not prescribe:

1. What customer authentication method to use (one-time-passcodes or passkeys like fingerprints are easier for customers to use than entering 20-digit account numbers);
2. Whether the platform has to attain particular uptime targets, i.e., not have excessive maintenance issues (platforms that are out of operation when the customer is available to initiate the data request will delay or derail the enrollment);
3. What terms and conditions third parties should be subject to in the interests of consumer protection (sometimes resulting in confusing or counterproductive requirements); or
4. The process for removing a third party from the platform and addressing liability for a data breach (creating due process problems and customer confusion).

The resulting flexibility provided to utilities and regulators is valuable, but it also means that commissions have approached these topics differently. While we decline to identify individual implementations, the differing ways that utilities or regulators have come down on these topics have significantly affected the extent to which data exchange platforms are used by third parties and utility customers. This means that quality of delivery matters. Fortunately, there are now multiple vendors who can deliver data exchange platforms, competing on quality, price, and functionality.

### **III. Improving Data Access Accelerates DER Deployment**

Like many other parts of the country, Pennsylvania is facing questions about what tools utilities, regulators, and customers have to promote energy affordability. Enabling customers to better use their interval data and share it with their preferred vendors and contractors is a straightforward tool that reduces manual errors, improves contractor efficiency, and saves utilities labor. This section addresses major use cases for a data exchange platform, as well as the data access requirements implicit in PJM's Order 2222 implementation.

The core features of a data exchange platform, described in Section II, allow it to facilitate

diverse use cases, many of which are actively used today. For example, UtilityAPI has deployed data platforms that enable residential customers to share their data with solar + storage developers and large business customers with multiple premises to streamline how they share utility data with their facilities managers and auditors, automating otherwise manual processes. In Massachusetts, we are building “bulk” data exchange platforms that will exchange interval energy data from utilities to retail suppliers and municipal aggregators.<sup>15</sup>

Smooth access to energy data is a precondition for many types of energy- and cost-saving programs. Drawing from our experience working with diverse third parties, including real estate, DER providers, large businesses, and low-income service providers, a data exchange platform could meet the needs of high-volume, high-impact residential and commercial use cases:

- A solar + storage developer can use actual interval data combined with time-varying rates (where available) to create more accurate estimates of energy savings associated with DER investments. Not only does this enable more precision in sizing DERs and matching them to grid capacity, it is now a requirement per legislation and regulatory order in California.<sup>16</sup> Aurora Solar recently surveyed customers and developers, finding that bill savings estimates must be more accurate and credible in an increasingly challenging marketplace.<sup>17</sup>
- A retail big box store with hundreds of premises, served by multiple utilities, can share hundreds or thousands of bills with facilities staff and energy managers. For this reason, Walmart has been a stalwart advocate for data access across multiple jurisdictions, including Illinois, New Mexico, Texas, and Virginia.<sup>18</sup> Similar benefits can accrue to municipal governments, which may have hundreds or thousands of premises.<sup>19</sup> Electronic data-sharing for business and institutional

---

<sup>15</sup> See fn. 12 at p. 5, 11.

<sup>16</sup> California Public Utilities Commission, Resolution E-5364 (issued March 18, 2025), 5, 12, available at <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M559/K800/559800004.PDF>.

<sup>17</sup> Aurora Solar, 2026 Aurora Solar Market Snapshot (March 2026), available at <https://aurorasolar.com/resources/2026-aurora-solar-snapshot/#ungated>.

<sup>18</sup> See, e.g., Illinois Commerce Commission, Docket Nos. 22-0487/23-0082/24-0238, Direct Testimony of Lisa V. Perry for Walmart (May 13, 2024) 8 (“For large energy users with multiple sites, like Walmart, it is critical that data access is automated, accessible by third parties, and provided in a standardized format”).

<sup>19</sup> New York Public Service Commission, Case 25-E-0072/Case 25-G-0073, Prepared Direct Testimony of New York City Billing Panel (May 2025) 33, 36 (“Participation in the Con Edison and NYISO demand response programs, as well as analyses associated with internal energy management initiatives, require detailed and granular energy consumption data. Because we do not have direct access to the output from Con Edison’s meters on City accounts, we must obtain this data

---

customers increases the opportunities they have to predict, stabilize, and reduce their bills.

- An energy advisor can work with an income-qualified customer in person, with data-sharing authorized by tablet at the time of the appointment, to identify best-fit bill assistance. Nonprofits like GRID Alternatives use electronic data-sharing to support their mission of delivering low- or no-cost solar to low-income households, increasing enrollment and allowing them to be more targeted with their limited resources.<sup>20</sup>

Many of these use cases rely on the same core data points around interval energy usage, bills and accounts, rate class, and program participation. By augmenting data sets and workflows to meet the needs of different categories of third parties, a data exchange platform can rapidly scale to serve very common uses of customer energy data in an accurate, replicable manner.

This flexibility is core to what makes a data exchange platform a foundation for DER aggregation. A platform that is built to meet, for example, the needs of multi-premise institutional customers could next integrate new data flows and third-party registration requirements, and then be capable of facilitating DERAs. Instead of creating bespoke data tools with duplicative data integrations across the same utility systems, a modern data exchange platform uses software industry best practices to manage permissions across diverse third parties while making data integrations efficient. This has direct implications for Order 2222.

While respectful of jurisdictional boundaries, ISOs/RTOs have been clear about the need for interval data for various forms of market participation. In a March 9, 2026 presentation to the Distributed Resources Subcommittee, PJM’s FERC Order 2222 Team laid out the full model for DER Aggregator participation as it currently stands.<sup>21</sup> While aspects of implementation are still being

---

from Con Edison. The City has about 7,500 electric and gas meters in Con Edison’s service territory, so the data is voluminous. . . . Direct electronic access to the data, especially for the City and other customers with multiple accounts, is essential to efficiently manage energy use”).

<sup>20</sup> Colorado Public Utilities Commission, Proceeding No. 24A-0547E, Public Comment of GRID Alternatives (filed September 3, 2025).

<sup>21</sup> PJM Distributed Resources Subcommittee (DISRS), FERC Order 2222 Team, DER Aggregator Participation Model: Full Model Design (March 9, 2026), *available at* <https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/disrs/2026/20260309/20260309-item-05---update>

resolved, it is clear that PJM expects to hold DER aggregators to tight timelines for day-ahead energy and capacity markets. Fast, electronic, permissioned sharing of significant volumes of customer energy, account, and billing data will be necessary to reduce lag times and potential errors in enrollment and settlement.

First, customer data will be necessary to enroll a customer's component DER in a DER aggregation and to register component DERs with PJM through the DR Hub,<sup>22</sup> which is being augmented through the Order 2222 process. This data includes interval data to determine if the customer is a candidate for load flexibility, as well as information about what tariff they are served by and whether they are participating in any other demand response programs, so that dual participation can be managed. Additional data may be required that is specific to PJM (e.g., pricing node or pnode).

Second, interval data must be transferred promptly and at scale to enable financial settlements. To allow PJM to perform settlement and determine DER aggregator performance to release payments, it must be able to understand the contribution of each component DER, cross-referenced to its relevant aggregation. PJM's compliance filings for Order 2222 include a requirement that meter data from component DERs be submitted within one business day.<sup>23</sup> The Independent Market Monitor for the PJM has stated that the most accurate and efficient way of understanding DER aggregator performance is by receiving interval meter data.<sup>24</sup> By receiving customer interval data on an ongoing basis, VPPs can improve their performance forecasts and remove non-performing customers, to the benefit of the entire

---

[d-der-aggregator-participation-model---full-model-design---informational-only.pdf](#).

<sup>22</sup> PJM Interconnection, DR Hub, available at <https://www.pjm.com/markets-and-operations/etools/dr-hub.aspx> (last visited November 18, 2025).

<sup>23</sup> See fn. 21 at slide 78.

<sup>24</sup> FERC Docket EL26-4-000, Comments of the Independent Market Monitor for PJM Interconnection re the 10/08/2025 Complaint of Voltus, Inc. and Mission:data v. PJM Interconnection (filed October 28, 2025) at 3.

---

system.<sup>25</sup> A data exchange platform with the features described in Section II can be configured to support both of these needs.

#### **IV. EDI Alone is Insufficient to Enable Scale**

EDI itself is not sufficient for DER aggregation to scale, particularly as it relates to residential customers. EDI is most commonly understood as a method to complete business-to-business transactions, such as billing, invoicing, and payment. Like Green Button Connect, it provides for the electronic transfer of customer billing and interval usage data. However, there are significant variations between the two approaches such that robust markets will benefit from using them concurrently for different use cases. This is the approach being used by Massachusetts, which intends to leverage Green Button Connect functionality to provide interval data to retail suppliers and municipal aggregators, while retaining EDI functionality for certain types of data transactions.

EDI has fundamentally different ways of addressing the three key features that we previously presented as being necessary for a modern data exchange platform: third-party registration, customer authentication and authorization, and data availability. These variations create friction which will limit the ability of DER aggregations to scale.

First, the process for third parties to register with a utility to use EDI is complex and not well-suited to every type of third party, compared to the process used by a data exchange platform. Because EDI also incorporates bill payment transactions, onboarding can involve repeated technical tests that require third parties to obtain specialized software support. The Commission also requires separate licensing prior to a retail supplier being able to apply for EDI access with an EDC. In contrast, a data exchange platform can offer more advanced options for third-party registration and faster

---

<sup>25</sup> Leap, The Road to Seven Gigawatts: Concrete Steps to Unlock California's Demand Response Potential (February 2025) at 7, available at [https://drive.google.com/file/d/1\\_mvwrHeZa5pzlxWVKfFriTgiwUEcY14Q/view](https://drive.google.com/file/d/1_mvwrHeZa5pzlxWVKfFriTgiwUEcY14Q/view).

technical onboarding. For example, states like New Hampshire are evaluating risk-based approaches to manage third-party registration efficiently.<sup>26</sup> In that example, a small business requesting authorized data from dozens of customers would be subject to baseline vetting whereas a DERA (or another type of larger-scale requester) would be subject to more stringent security screening requirements. A licensing check could be built into that process and applied to third parties for which it is necessary. Moreover, high-performing data exchange platforms enable registered third parties to conduct system testing and develop workflow integrations while they wait on full approvals, making the process more efficient. This allows third parties to save costs on customer software integrations and utilities to reduce time and costs related to troubleshooting.

Second, EDI does not natively address customer authentication and authorization, whereas a data exchange platform is entirely oriented around customer consent. Suppliers make requests for historic and ongoing data on behalf of customers based on authorizations obtained through the contracting process.<sup>27</sup> Because utilities often lack direct evidence of customer consent, commissions have developed many consumer protection practices, including requirements for retail suppliers to collect authorizations across different formats, provide information as part of licensing, and maintain strict documentation in the event of complaints. However, the data exchange platform model allows utilities to authenticate customers' identity directly prior to transferring authorized data—an increasingly necessary feature as concerns about customer privacy grow with the rise of artificial intelligence. The authorization process is also tracked for auditing purposes, enabling customers to initiate requests to revoke data access according to their needs and preferences. In other words, a well-designed data

---

<sup>26</sup> See, e.g., New Hampshire Public Utilities Commission, Docket No. 19-197, Appendix C and C-1 to the Joint Settlement Agreement (approved by Order No. 26,589, issued March 2, 2022).

<sup>27</sup> Errors in the EDI testing process have resulted in problems with slamming, an outcome which is not possible when the customer is directly authenticated through a data exchange platform. See, e.g., <https://www.puc.beta.pa.gov/press-release/2019/puc-approves-settlement-with-astral-energy-llc>.

---

exchange platform logs evidence of authorization and revocation so that data flows can be activated or cut off promptly, as appropriate. This also provides additional certainty where customers are signing up for new programs, such as DER aggregation.

Third, regarding data availability, EDI can be used to provide commonly needed information like interval usage data and customer billing data, but it also incorporates many permissible variations on how utilities implement the data format that make it far from a nationally consistent standard. EDI relies on “transaction sets” that act like a type of business document, such as an invoice. The transaction set is designed to accomplish a particular business-to-business task and utilities may organize the necessary data that is within that transaction differently. In contrast, Green Button Connect relies on “function blocks” which incorporate categories and labels for particular types of data. This is a meaningful distinction because even though EDI facilitates various transactions, the variations in how utilities format and label data make it more cumbersome for third parties operating across regions. Third parties often have to standardize data by proxy, investing in translation software that adds an extra layer of complexity to their data imports before usable information can be integrated into customer enrollment workflows. Under a Green Button Connect implementation, that kind of data translation happens once, converting data into a single, consistent standard prior to distribution to third parties.

While EDI has enabled a robust competitive marketplace in Pennsylvania and other states, supplementing it with a Green Button Connect-enabled data exchange platform will promote scalability as new third parties arrive. The security and privacy benefits of Green Button Connect alone weigh in its favor as more residential and small business customers are participating in DER programs: in addition to customer authentication and clear records of authorization and revocation, Green Button Connect requires data encryption and other important cybersecurity protections. Accordingly, modern data exchange platforms represent a technological evolution that can be operated alongside EDI.

---

## V. Summary of Recommendations and Conclusions

Industry experts continue to identify lack of smooth data access as one of the largest barriers to DER aggregation. Wood Mackenzie’s 2025 North America VPP Market Report stated that “[l]ong after the digital revolution, friction in data access remains the greatest technical impediment to residential and small commercial participation in wholesale markets.”<sup>28</sup> The Department of Energy raised similar concerns, noting that hourly and daily customer energy data is required for aggregators to enroll customers, calculate performance, and conduct settlement, and that lack of access to this critical information limits aggregators’ ability to scale VPPs reliably.<sup>29</sup> Similarly, crafting “seamless enrollment” for DER customers was identified by Lawrence Berkeley National Laboratory and the Brattle Group as one of the top five impactful actions utilities can take to help VPPs scale.<sup>30</sup>

As we discuss above, a data exchange platform would provide immediate value to customers and third parties as they engage in energy management and DER development activities. This includes immediate improvements in customers’ ability to securely share and revoke data without also sharing log-in credentials with a third party. It also includes improvements to third parties’ ability to receive data promptly, with less risk of error, and in a format that enables quick scaling across utilities, states, and regions. As PJM finalizes its DR Hub requirements, a Green Button Connect-certified data exchange platform could be refined by adding specific data and work flows to enable DER aggregator registration and settlement.

Accordingly, UtilityAPI respectfully recommends that the Commission modify its current

---

<sup>28</sup> Excerpts from this report can be downloaded at <https://www.woodmac.com/news/opinion/virtual-power-plant-growth-is-getting-very-real/>.

<sup>29</sup> U.S. Department of Energy, Pathways to Commercial Liftoff: Virtual Power Plants 2025 Update (January 2025) 43, available at <https://www.smartenergydecisions.com/research/pathways-to-commercial-liftoff-virtual-power-plants-2025-update/>.

<sup>30</sup> R. Hledik et al., Distributed Energy, Utility Scale: 30 Proven Strategies to Increase VPP Enrollment (December 2024) 28, available at <https://emp.lbl.gov/publications/distributed-energy-utility-scale-30>.

NOPR Order to incorporate rules related to DERAs’ access to interval and other relevant data necessary to comply with Order 2222. We recommend that the rules also endeavor to accommodate other significant categories of third parties, such as DER developers broadly. The time is ripe to move forward in Pennsylvania. Given the February 2028 start date, Maryland and New Jersey are both evaluating the steps required for Order 2222 implementation. The Maryland Public Service Commission recently directed the creation of a term-limited Data Exchange Work Group to finalize data-sharing rules and develop criteria for selection of a vendor to implement a multi-utility data exchange platform.<sup>31</sup> In so doing, Maryland recognized the need for load flexibility to promote affordability and the need for data exchange to promote load flexibility. In New Jersey, nearly-final rules address key topics like what types of data should be made available to third parties and under what conditions.<sup>32</sup> With refinements, the New Jersey draft rules could be imported to Pennsylvania, fulfilling many of the conditions for success described in our comments, and with the added benefit of promoting regional alignment. Action in Pennsylvania is timely to move in parallel with actions across peer states, to build on their robust stakeholder work, and to ensure that data access is in effect as DER aggregation scales.

We appreciate the opportunity to comment on this important process and look forward to continuing to participate in future steps.

Sincerely,

/s/ Kelly B. Crandall  
Kelly Crandall  
Vice President of Regulatory and Policy  
[kelly@utilityapi.com](mailto:kelly@utilityapi.com)

---

<sup>31</sup> Maryland Public Service Commission, Case No. 9778, Order No. 92398, Order on Electric Utilities’ VPP/DER Conceptual Reports and Office of Cybersecurity Status Report (May 6, 2026) 10-11.

<sup>32</sup> New Jersey Board of Public Utilities, Docket No. EX24090717, 57 N.J.R. 1949-1951 (September 2, 2025).