

July 10, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania 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 reply comments in response to the December 18, 2025, Notice of Proposed Rulemaking (NOPR) Order¹ issued by the Pennsylvania Public Utility Commission (Commission) regarding the implementation of distributed energy resource (DER) aggregations or DERAs pursuant to Federal Energy Regulatory Commission (FERC) Order No. 2222.

In our initial comments, we highlighted the opportunity presented by modernizing data access in Pennsylvania to enable virtual power plants to scale. The affordability crisis is growing and one of the best near-term tools that customers have to navigate it is energy management—which requires accurate access to energy usage data. We therefore recommended that the Commission not defer issues around data access to the Electronic Data Exchange Working Group (EDEWG), but instead implement pragmatic rules, drawing from proceedings in peer states, during the course of this Docket. Specifically, we proposed that the Commission direct regulated electric utilities to implement certified Green Button Connect My Data™ (Green Button Connect or GBC) solutions with best-practice security, privacy, and user experience features.

¹ Published in the Pennsylvania Bulletin on April 11, 2026.

In 2015, at the Commission's direction, the EDEWG Web Portal Working Group produced a Solution Framework that gave rise to the secure web portals and standardized CSV usage files utilities exchange with third parties today.² Two lessons from that process bear directly on this Docket. First, the Solution Framework acknowledged challenges inherent in systems that require data requests to be made on an account-by-account basis and recognized the potential for bulk, machine-to-machine data transfer. Second, while the Solution Framework deemed Green Button Connect implementation premature as of 2015, it specifically recommended that the standard be revisited as it matured. Certified Green Button Connect data exchange platforms are in use across multiple states—including but not limited to UtilityAPI implementations in California, Massachusetts, Michigan, New Mexico, New York, and Texas—and can be configured to address gaps like bulk transfer.

As our comments discussed, relevant software has evolved considerably since the Commission began its consideration of data access standards over a decade ago. There have been many lessons learned regarding how to ensure that a data exchange platform is easy for customers to use, capable of delivering what third parties need to provide services to customers, and secure and efficient for utilities to manage. Successful data exchange platforms are built on modern privacy standards and security protocols, and are used by customers to authorize data access on a daily basis, for purposes ranging from energy auditing to demand response. In addition to enhanced privacy and security protections, a major benefit of a data exchange platform built on Green Button Connect is that it leverages national standards. Utilities may store data in different ways, but Green Button converts that data into a format that is readable by third-party entities regardless of which utility they work with or whether the data is shared with a DER aggregator, a state agency, or the customer's own energy management system.

Given that the Solution Framework was issued over a decade ago and standards and solutions

² Docket No. M-2009-2092655, Pennsylvania Web Portal Working Group Solution Framework (filed February 23, 2015).

have significantly progressed, revisiting the most efficient approaches to data exchange is overdue. Therefore, we continue to recommend that Pennsylvania move toward one or more modern data exchange platforms, implemented by individual utilities or in coordination with each other to create consistency. In their initial comments, the Coalition Advocating DER Regulation Efficiency (CADRE), the Energy Justice Advocates/Earthjustice, the Energy Efficiency Alliance (EEA), the Keystone Energy Efficiency Alliance (KEEA), the Mission:data Coalition (Mission:data), the Natural Resources Defense Council (NRDC), and Voltus, Inc. (Voltus) all recommended moving forward with streamlined, electronic data access, frequently referencing Green Button Connect. PPL Electric Utilities Corporation (PPL Electric), Duquesne Light Company (Duquesne Light), and PECO Energy Company (PECO) also variously raised the need for additional clarity around data scope or coverage, exchange protocols, and consumer protections. In our experience with over a decade of data platform implementations, Green Button Connect is best-positioned to meet these needs while addressing concerns raised by entities like the Office of the Consumer Advocate regarding customer privacy and control over data-sharing.

Accordingly, as Mission:data has recommended, the Commission could import language under consideration by regulators in New Jersey and Maryland, and we support the Commission seeking additional comments during this Docket as necessary to ensure all stakeholders have fully explored the topic. Specifically, we recommend further exploring the language that Mission:data included in Appendix A regarding “Ownership and sharing of AMI data” and “Third-party authorization and security,” which are policies that would support a modernized data exchange platform.³ They extend the Commission’s draft language at § 57.265 by clarifying the mechanism that is best-suited to the need.

Adopting rules at this time is feasible given the significant number of proceedings around data

³ However, unlike Mission:data Coalition, UtilityAPI does not necessarily oppose the development of user fees as part of data exchange, subject to additional consideration through appropriate tariff proceedings.

access that the Commission has hosted over the last decade. Discussions about best-practice tools for streamlined, electronic data-sharing are not new to Pennsylvania, and the topic has been raised by comments in this Docket prior to the ANOPR being issued.⁴ Furthermore, should the Commission wish to seek more specific feedback, it could seek supplemental comments on Mission:data's proposed language prior to issuing a final order in this Docket.

II. Alternative Path: Establish Concrete Direction and Deliverables for the EDEWG

However, should the Commission determine that the EDEWG is the appropriate forum for consideration of data access policy, we agree with the numerous stakeholders—including CADRE (p. 12) Duquesne Light (p. 9), EEA (p. 3), and NRDC (p. 10)—that EDEWG will, at minimum, require additional guidance to be able to complete the Commission's direction. In Order No. 92,398, the Maryland Public Service Commission (MPSC) similarly established guidance for a term-limited Data Exchange Work Group (Maryland DEWG), which is tasked with drafting "regulations and parameters for implementation of a state-wide GBC-compliant data exchange platform" by November 6, 2026.⁵ In this vein, we suggest additional direction that the Commission could provide to clarify its expectations for the Pennsylvania EDEWG. Specifically, we recommend that the Commission establish the following directives for the EDEWG:

- 1. The Commission Should Set Objectives for the EDEWG.** The MPSC stated that in order to meet the requirements of Order 2222, any data platform or tool "should incorporate the pillars of data privacy, customer authentication and authorization, data standardization, and third-party registration and onboarding," as well as providing a "secure, customer-friendly experience."⁶ These pillars reflect positive outcomes for a data exchange platform that are not necessarily tied to a specific approach or technology, but are all important to create a working data-sharing solution. We recommend that the Commission adopt the pillars set forth by the MPSC and direct the EDEWG to use them as a lodestar to consider the effectiveness of data-sharing solutions.

⁴ Comments of the DER Task Force (May 29, 2024) at 28.

⁵ Maryland Public Service Commission, Case 9778, Order No. 92,398 (May 6, 2026) at 10-11.

⁶ *Id.* at p. 11.

2. **The Commission should clarify that just because it is deferring work to the EDEWG, does not mean the EDEWG is tied solely to promoting traditional EDI as a solution for data-sharing challenges.** We agree with CADRE on this point (p. 12). Our initial comments explained the numerous and significant differences between Green Button Connect and EDI. We recognize that Pennsylvania stakeholders and utilities have invested resources in standing up EDI solutions and may continue to rely on it for various uses regardless of a Green Button Connect solution. However, the EDEWG must consider the opportunity for demand response and distributed energy resources to scale. For the reasons we discussed in our initial comments, we do not believe these goals can be met by treating EDI as a permanent end state for data transfer, although it can serve as a valuable, near-term bridge while the Commonwealth transitions to Green Button Connect as the ultimate solution.⁷ Other commissions are similarly modernizing data-sharing solutions with sensitivity to local needs. For example, the MPSC has determined that instead of augmenting existing tools, a data exchange platform built on Green Button Connect is a logical step to address data-sharing in the context of Order 2222. Conversely, in Massachusetts, UtilityAPI is building “bulk” data-sharing capabilities using Green Button Connect, which retail suppliers will use in parallel with EDI.
3. **The Commission should ensure that the EDEWG has access to necessary expertise.** In order to fully and fairly consider which data solution is appropriate for Pennsylvania to enable Order 2222 compliance, the EDEWG will probably need to adjust its composition to incorporate different skillsets. The EDEWG will need to understand the distinctions between EDI and GBC, for example, and which core functionalities can be provided by EDI versus where GBC functionalities are additive to or an improvement on EDI. Accordingly, we recommend that the EDEWG appoint a project lead that has experience implementing or using a Green Button Connect solution to lead this process. EDEWG should also specifically invite the participation of the nonprofit Green Button Alliance, and should promote additional stakeholder participation, beyond current members, to ensure that appropriate expertise is represented.
4. **The Commission should specify deliverables for the EDEWG.** In our experience, an efficient timeline is necessary to promote resolution of technical issues that require stakeholder focus. For example, given prior case history and Order 2222 deadlines, the MPSC determined that a stakeholder process regarding data access should be resolved within 6 months. Similarly, we recommend that the Commission direct the EDEWG to deliver its recommendations for achieving the pillars proposed in item 1—including whether specific rules, tariffs, or other actions should be implemented in order to transition to a modernized, data exchange platform that leverages the Green Button Connect standard—within 6 months of the completion of the final order in this Docket.

⁷ While the Commission could direct the EDEWG to explore any other appropriate data-sharing solutions, it is unclear what those would be. Green Button Connect is the only nationally accepted suite of standards and protocols for the permissioned exchange of energy data. Based on our experience with various data exchange technologies, the decision before the Commission is best framed as how utilities can leverage traditional EDI as a near-term solution while adopting modern data exchange platforms built on Green Button Connect. While phased implementation of software can sound appealing, in this instance, modern data exchange platforms can be implemented through commercial off-the-shelf software—a more efficient approach than making extensive, custom improvements to legacy software.

Given the similar timelines, it will be efficient for the EDEWG to engage with the Maryland DEWG later in 2026, to determine which activities and deliverables are applicable to the Pennsylvania regulatory environment. We believe this would create major efficiencies for stakeholders in Pennsylvania who are managing significant caseloads while promoting productive regional alignment.

III. Summary of Recommendations and Conclusions

Importantly, implementing a modern data-sharing solution does not have to be time-consuming or expensive. Utilities do not have to build entirely new applications—there is a robust vendor marketplace (of which we are a part) that can deliver implementations in a matter of months at a fraction of the cost and labor required for *de novo* software builds. Given the work of states like Maryland, Pennsylvania does not have to duplicate policy discussions on data modernization—it can learn from other states about what use cases are most impactful, which functionalities promote effectiveness, and what data third parties need from customers to perform services like DER aggregation.

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

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