

Customer Data Access

Description:

Many states and utilities are looking toward the “smart grid” as a mechanism for improving and modernizing the utility grid. However, much of the realization of the potential for improving service to customers relies on an active private sector developing applications targeted at increasing consumer value. The increase of consumer value may or may not be in the best interests of the incumbent utility and in most states, the utility is the gatekeeper to any consumer data access. If the market is to effectively find a willing buyer for its services, they must have access to that consumer, and be able to enter into an agreement with that consumer. This is where the question of consumer data access becomes a relevant issue.

Discussion of the Policy:

Policies for allowing third party access to consumer data may either take the form of ownership or permission.

In the former, legislation would establish that all information related to consumer energy use or signals provided by the utility are the property of the customer. By doing this, you put the customer as the sole owner of this data and thus, the controlling entity of the data. In this instance, it would be wise to include a provision saying that an agreement with a utility to provide service to the customer releases all data owned by the customer to the utility.

A second approach would be to specifically state that the customer has sole authorizing authority to release data to a third party through a standard agreement. This would not get into the “data ownership” question, but rather to the permission by the customer for a third party to access any relevant data. It is important that if the customer is given the authorizing authority in this case, that the utility not be placed in a position of gatekeeper, either approving the data distribution or given the authority of approving providers. The objective of the legislation or policy is to open the marketplace between service providers and customers.

Once permission is granted (either through ownership or permission), the third party should have direct access to the data at the highest possible resolution of interval data available. This allows the marketplace to directly innovate automated products in support of various customer services.

Any data access policy should include clear privacy provisions that are based on the existing FIPP - Fair Information Practice Principles. There are five principles they suggest are essential: 1) Notice/Awareness; 2) Choice & Consent; 3) Access/Participation; 4) Integrity/Security and; 5) Enforcement/Redress.

Key Components:

- Policies clarifying who owns the energy data associated with consumer energy usage
- Policies protecting customer privacy
- Policies outlining the process for allowing direct access of data to third parties
- Policies promoting access to the highest resolution of data by third parties
- Reference to the Fair Information Practice Principles
- Incorporation with legislation requiring grid modernization, AMI metering technology and green button policies.

More Information:

- GridWise Alliance Policy Position on Data Access & Privacy Issues:
http://www.smartgridinformation.info/pdf/4887_doc_1.pdf
- California PUC Data Privacy and Protection Decision:
HTTP://DOCS.CPUC.CA.GOV/PUBLISHED/FINAL_DECISION/140369.HTM
- EIA Assessment of Interval Data and Their Potential Application to Residential Electricity End Use Modeling:
<https://www.eia.gov/consumption/residential/reports/smartmetering/pdf/assessment.pdf>
- Mission Data, Index of Mission Data Activities:
<http://www.missiondata.org/activities/#index>