OEB
Green Button - IWG

Independent (Industry-led) Working Group for the implementation of Green Button in Ontario

Co-Chairs: Eddie, Gary, Jeremy

IWG - Agenda for Today

1. **OEB Staff – Land Acknowledgment**
2. **Onboarding of 3rd parties (30 minutes)**
3. **Contracts (15 minutes)**
4. **General (15 minutes)**
5. **Customer Awareness of GB / Third-Parties (15 minutes)**

When speaking, first state your name, Company and services you provide / wish to use related to Green Button.

Onboarding of 3rd parties (30 minutes)

Goal: Understand onboarding and the processes required for Third Parties to "Go Live"

Task: Utilities to walk through the Use Cases and their requirements for third Party Onboarding.

Use Cases for Utility public website, third party Onboarding Portal and Utility Portal.

- Expected third Party Types (e.g. Vendor, Account Holder (large user multibuilding and or single account User) , Consultant, Software Developer)
- User Types of the Onboarding Experience and required information required. (e.g. Business signatory, Development team)
- Expectation of Knowledge (must have Green Button standard experience)

Example: what are the criteria for being a third party; request to view software etc. or request to provide software name?

Third parties to share their feedback of Use Cases to help with misunderstandings.

Output: This item is for onboarding experiences and useability (third parties and distributors) and we look to define any issues / develop new best practices / FAQ's if required

Contracts (15 minutes)

Utilities to walk through their needs and requirements for the contracts and what is being agreed to in the contracts. (Example an issue: requirement for authority to sign a contracts)

How are the Contracts being used / presented in the Onboarding flow. e.g. Is it a take it or leave it scenario or negotiable. Does it fit with the expected third-party types from Agenda #1. What requirements do the Utilities have. e.g. OEB Guidance exists, however are the contracts in tune with expectations.

Example: what are the criteria for being a third party; request to view software or request for cyber security? Request for management of Third-Party systems or use of Utility systems. Obligations due to the Utilities roll as the Data custodian over the role of the account holder owning the data.

Note: Input of Utility vendors is important, as they service the distributors.

This item is for Understanding the Legal requirements, experiences and useability (third parties and distributors). We look to define any issues / develop new best practices / FAQ's if required

General (15 minutes)

Process questions (who a third party can contact when issues arise – distributor or vendor?)

Discuss the Change management approach of item #1 and 2

This item is for Understanding the Support requirements, experiences and useability (third parties and distributors). We look to define any issues / develop new best practices / FAQ's if required

Customer Awareness of GB/Third-Parties (15 minutes)

How do third parties make customers aware of their products and services currently?

Third Party Websites?
Utility Websites ?

Q: When customers reach out to utilities, are they asking for GB service providers or service providers that work in the utility service area and install, heat pumps, solar panels, air conditioning, etc.?

Q: Should Utilities have a page advising what third parties are onboarded. What about Data needs? What about onboarding policies in place.   Are Utilities the validator of the parties that onboard?

Q: Can Third-parties have a page advising what distributors they are onboarded but what legals and onboarding policies are in place so Utilities can approve external authorization.   How is this validated by others? (ex: Cannot use utility logo on 3rd party website)

IWG
Thank you for your participation
To reach out to the Co-Chairs - Email us

Reference Material

Administrative - General

- Etiquette. Be respectful and Asking Questions state company & name
- IWG document 2022 and OEB Response on OEB Website

https://www.oeb.ca/consultations-and-projects/policy-initiatives-and-consultations/green-button-industry-led-working

Regulation: See https://www.ontario.ca/laws/regulation/r21633

- All previous Best Practices and OEB response - at the end of the slide deck

Contacting the OEB

- For general enquiries about the Ontario Energy Board, please visit our **contact page**.
- If you wish to make a complaint about a utility or energy retailer, please visit our **complaints page**.

Compliance and other regulatory enquiries
- If you are an energy market participant or other interested party and would like to raise an issue, seek guidance regarding policy or regulatory obligations, or forward an allegation of non-compliance activity, please email:
- **IndustryRelations@oeb.ca**
  Include the following:

  - Full contact information

  - Subject - i.e. Accounting, Applications, Filings, Licensing, Rates/Charges, Reporting Requirements etc.

  - Specific details

  - Supporting documents

  - By clearly describing the circumstances and providing the background information, we are able to provide a complete response in a faster period of time.

Past IWG OEB Feedback on Implementation in 2023

For Discussion #2023-05.2: Source of Truth for Electric Usage Data (presented 9/14/23)

1. QualityOfReading: Electric usage intervals will be marked as "revenue quality" (19) or "estimated" (8 or 9). Third Party will know the usage data is "final" by checking if data were received AFTER the bill has been generated. "Valid" readings may change and are not final until after billing.

<u>**Why?**</u>

- Regulation 393/07 grants the SME exclusive authority on electric meter usage data validation. Ratepayers already pay for this function.

- Market-wide consistency is more important than accuracy. To have trust in the market, Green Button data must match the bills and the SME.

- Mismatches drive significant costs and uncertainty for both third parties and utilities.

Notes: Green Button data won't be officially correct until it's billed. SME has "valid" or "estimated" status. Third Party will know it's "final" by checking if data were received AFTER bill is generated.

Best Practice - ITWG – Ontario Green Button Billing Line Items Naming– For Discussion

Best Practice Recommendation #14

- ITWG participants believe bill item naming standardization should continue into the future for clearer understanding to 3rd parties
- ITWG has created a final version of the bill item mapping sheet to be shared with the public via the OEB
- ITWG recommends that the OEB take on the process of keeping this list updated with stakeholder input in the future, whenever new programs or pricing changes that affect most utility bills are rolled out in Ontario
- ITWG recommends that the OEB post this sheet for public consumption on the Green Button consultation page of the OEB website

*Note: this does not supplant or replace billing standards/regulations for individual utilities

Recommendation #7.2: offline authorizations

Approved

For customers without internet access, the Utility should establish both telephone and/or paper form-based processes whereby a customer can grant a data-sharing authorization (or revocation).
* In the case of telephone authorizations, Utility staff should assist the customer to meet the authentication and authorization requirements. (The intent of this recommendations is not to resolve or address the mechanism of bulk authorizations.)

* Telephone or paper methods will be available based on customer type following standard Utility practices. For example, Utilities may prescribe paper forms for large commercial customers but support telephone authorizations for residential customers.

Why?
- Green Button is a digital tool; however, we anticipate a small number of customers who do not have Internet access, will want to share their data with third parties. To ensure confidentiality and accountability in a telephone call, this is best handled by the Utility staff, who have access to the customer's information.
- Business customers may want to use paper forms to ensure that internal approvals are correctly obtained.

Question Raised to OEB by IWG
At the ITWG meeting there was discussion on Offline Authorization / suspension / removal of 3rd parties. The IWG was asked to look for clarification from the OEB

Are Utilities required to provide a service for GB where customers;
- Do not have access to the internet
- Do not have an online utility account or can't access it
- Want to authorize or remove third party(s).
- Want to authorize a 3rd party with multiple accounts

 2 separate discussion items.
 - Does the Utility need to have a process to service this group of users. e.g. manual process - the Utility validates user, provides, authorization / suspension on behalf of the Account holder. (e.g. call in)
- Since the standard does not provide this option, should the ITWG make recommendations for future versions of the Standard.

OEB Response / Questions?

Both the [Guidance Letter](#) issued on November 1, 2021 and the OEB Response to the GB IWG Report issued on November 22, 2022 advised that customers who wish to access their data or authorize a third party to access their data should be able to do so consistent with the Green Button Regulation, and **that distributors need to consider alternate authentication approaches to allow customers without an online account with the distributor to participate in Green Button**.

The OEB Response to the GB IWG Report further advised that should the GB IWG wish to continue to meet, establishing a uniform approach to such alternate pathways may be an area it wishes to focus on.

OEB Response / Questions continued

In relation to the question on the NAESB ESPI Standard, the version of the that standard that applies in Ontario is defined per Section 1 (2) in the [Green Button Regulation](#) as "the standard titled "REQ.21 Energy Services Provider Interface Model Business Practices", version 3.3, **published on January 30, 2020** by the North American Energy Standards Board." Section 2(2) of the Green Button Regulation requires energy providers to implement that version of the standard.

Further updates of the standard by NAESB would not become a requirement in Ontario without amendments to the Green Button Regulation.

There are questions related to 3.4 of the Regulation. IWG was requested to get OEB feedback.
 Authorization 3.4 states
 (4) Every energy provider shall, in accordance with such requirements as may be established by the Board, establish a policy regarding privacy of energy data.
Questions:
 - Who is this privacy policy for?
- Is this something that flows down to the customer and 3rd party? If so, how is this enforced?
 - Can a Utility require that the data stay in Canada or that the third party meets Canadian Privacy laws.
 - Does the above put the obligation of enforcement on the Utility if it is a requirement?
 This item received clarification and feedback was requested from the sub working groups.

OEB Response / Questions?

The OEB's [Green Button Guidance](), issued November 2021, speaks to privacy being the distributor's own privacy policy. Further, a distributor does not necessarily need to create a separate policy for GB just that it's existing policy should reflect GB, as relevant.
 Per Section 3 (4) of the GB Reg. must be provided in electronic format to the customer when it authorizes (OEB envisages this to be via a link at authorization time).

The Guidance also states that it would generally not be a distributor's role to monitor the behaviour of a third party once the customer agrees to share their data with the third party. Rather, it is the third party's responsibility to manage the data under its own privacy policies and legal or regulatory requirements. The [Industry Relations]() process is also available for parties that have questions related to the Reg. / GB requirements.

Are there rules about changes to the interface that require Re-Certification

OEB Response

The requirement in Ontario Regulation 633/21 (the Green Button Regulation) is as follows:

Certification

- 4. (1) Every energy provider shall ensure that its implementation of the requirements set out in subsection 25.35.8 (2) of the Act and in this Regulation is certified by the Green Button Alliance to its "Connect My Data" and "Download My Data" standards.
- (2) The certification described in subsection (1) must be obtained no later than two years after the day this Regulation comes into force, subject to any extensions granted under section 5.

Once a distributor has been certified consistent with Section 4 above, it is compliant with the regulation in this respect. While it is difficult to comment definitively on this question without more specific information, OEB staff's view is that a distributor's certification would remain valid unless there are any changes to its system(s) that would impact the existing certification.

OEB staff encourages distributors to contact the OEB via Industry Relations: https://www.oeb.ca/industry/contact-industry-relations

What Additional Scenarios Are We Looking for Clarity on from the OEB:

Related to the question "What is the OEB going to do with this committee after November"
 - We've had a number of updates to Best Practices. How are these changes going to be consolidated and shared publicly with the Industry?

OEB staff plans to meet with Co-Chairs in November to discuss future of GB IWG. We will be happy to discuss this specific item at that time.

Related to the question "Are there rules about changes to the interface that require Re-Certification"

We would like clarification from the OEB "… a distributor's certification would remain valid unless there are any changes to its system(s) that would impact the existing certification."

- Could we compile (with GBA input) some substantive guidance, with examples. We understand Distributors are to notify the GBA if any of the following conditions apply at present or at any point in the future:

1.	Change in software.
2.	Change in server.
3.	Changes in the standards to which compliance was granted.
4.	Changes in the ownership.
5.	If the product may no longer comply with the requirements.

As the OEB response is somewhat open to interpretation, we think it would be valuable to provide further guidance

OEB staff agrees that it makes sense for GB IWG members to compile examples of such system changes and get input from GBA (in the GB IWG meetings) on whether such examples may impact existing certifications.

As always, if any distributor or other party has a question for the OEB directly, please use IndustryRelations@oeb.ca

Best Practice #2023-04: Data Errors & Updates (presented 9/14/23) – NON-CONSENSUS

1. Billing data updates shall be handled via Rec #2023-02.

2. Electric and gas usage data updates shall be handled via Rec #2023-01.

3. Notifications:

   1. LDCs should handle all updates and errors as soon as possible via established Green Button processes (e.g., pub/sub notification, bulk transmission via REST, etc.)

   2. Should any errors or updates require LDCs to take a manual corrective action, then the LDC shall timely notify the affected Third Party and explain the circumstances (e.g., complex account number changes that result in re-issuance of bills).

Why?

- Regulation 633/21 defines "energy data" as that which is available to the account holder. This process helps resolve discrepancies with Green Button data, if they surface.

- OEB asked for clarity.

- Manual fixes will trigger a notification to the Third Party, whereas updates in the normal course of business (such as to billing or usage data) will occur automatically using established Green Button procedures.

Reason(s) for Non-Consensus:

Utilities would like further review of this information including a review of the Regulation and are not prepared to pass this Best Practice at this time.

Utility Vendors and Green Button Provider would like further review and are not prepared to pass this Best Practice at this time

Best Practice #2023-05.2: Source of Truth for Smart Electric Meter Usage Data (presented 9/14/23) – NON-CONSENSUS

1. For customers with less than 50kW peak demand, electric usage data provided via CMD shall match with the Smart Metering Entity (SME) after a bill has been generated. Electric usage data sent *before* a bill has been generated is considered not final.

Why?

- Regulation 393/07 grants the SME exclusive authority on electric meter usage data validation. Ratepayers already pay for this function.

- Market-wide consistency is more important than accuracy. To have trust in the market, Green Button data must match the bills and the SME.

- Mismatches drive significant costs and uncertainty for both third parties and utilities.

Notes: Green Button data won't be officially correct until it's billed. SME has "valid" or "estimated" status. Third Party will know it's "final" by checking if data were received AFTER bill is generated.

Reason(s) for non-consensus: Needs regulatory review

Utilities would like further review of this information and are not prepared to pass this Best Practice at this time.

Utility Vendors and Green Button Provider would like further review and are not prepared to pass this Best Practice at this time

Best Practice : Best Available Meter Data – Non-Consensus (6/15/23 at IWG)

LDCs shall provide electric and gas usage readings that (1) are up to date to the best of their knowledge at the time of transmission; (2) correctly use the QualityofReading attribute to denote reading quality; and (3) are updated to the Third Party as soon as possible when updates occur. This recommendation does NOT impose new metering, meter reading or validation, editing and estimation (VEE) requirements on LDCs, but rather ensures symmetry in the quality of usage information available to both LDCs and Third Parties.

<u>Why</u>?
o   Third Parties need to know the level of accuracy of the usage data they received for decision-making and settlement.

o   There is a need to strike a balance between 100% accuracy (which is impossible) and 0% accuracy (which is unworkable), recognizing the complexities of VEE

o   This is not a prohibition on estimated readings. Estimated reads should be properly marked using QualityOfReading.

Reason(s) for Non-Consensus: Already assumed to be part of the implementation. No need for Best Practice

Best Practice: Simple KPIs - Approved 6/15/23 by IWG

LDCs shall provide key performance indicators (KPIs) to OEB on a quarterly basis similar to the following:

- Number of third parties in the onboarding process
- Number of third parties that have completed all onboarding and are available to any customer
- Number of one-time customer authorizations via GBCMD (by usage / billing / account info)
- Number of ongoing customer authorizations via GBCMD (by usage / billing / account info)
- Number of account holders with one authorized Third Party vs. two or more

This is a best practice, not a requirement at this time. The expectation is that these should not be mandated by the regulatory deadline due to the time and effort involved to implement.

Why?

o   OEB and the Ministry will want information to judge the utilization levels of GBCMD across the province.

Best Practice: Best available billing data – Approved 6/15/23 by IWG

LDCs shall provide electric and gas billing data that (1) is consistent with the bills delivered thorough portals including e-billing (historically and into the future); (2) include all bill corrections & changes; and (3) are updated to the Third Party as soon as possible when updates occur. This recommendation does NOT impose new billing or metering requirements on LDCs, but rather ensures symmetry in the quality of bill information available from LDCs to Third Parties and account holders.

Why?

- Must be compliant with the Regulation and OEB guidance

- There is a need for high accuracy of billing information for decision-making

- Bills are required in normal business practices and are used as official receipt. Thus, the billing data provided via Green Button should be consistent with the "energy data" (as defined by Regulation) on the bills.

- Bill data is already used by 3rd parties and account holders and it is always assumed that the bill is the official receipt which is used for payment, auditing and informational / operations purposes.

Best Practice #2023-06: Data, Functionality or Interface Changes – APPROVED BY IWG 9/14/23

Utilities should provide advanced notice to registered third parties about substantial changes to Green Button CMD implementation involving energy data, functionality or interface changes. Changes include, but are not limited to:

- New bill types or billing plans

- New data types added to CMD that are not captured or capturable in v3.3 of the standard

- Changes in certification, including changes to pass/fail status of individual certification tests

- Customer user interface modifications such as new web pages in the authorization flow or interstitials; the addition of multi-factor authentication requirements; or substantial deviation from UX best practices established by the IWG

Why?

- Un-noticed significant changes will drive costs and uncertainty, triggering support requests.

- Customer education materials about the consent process will need to be modified.