OEB
Green Button - IWG

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

Co-Chairs: Eddie, Gary, Jeremy
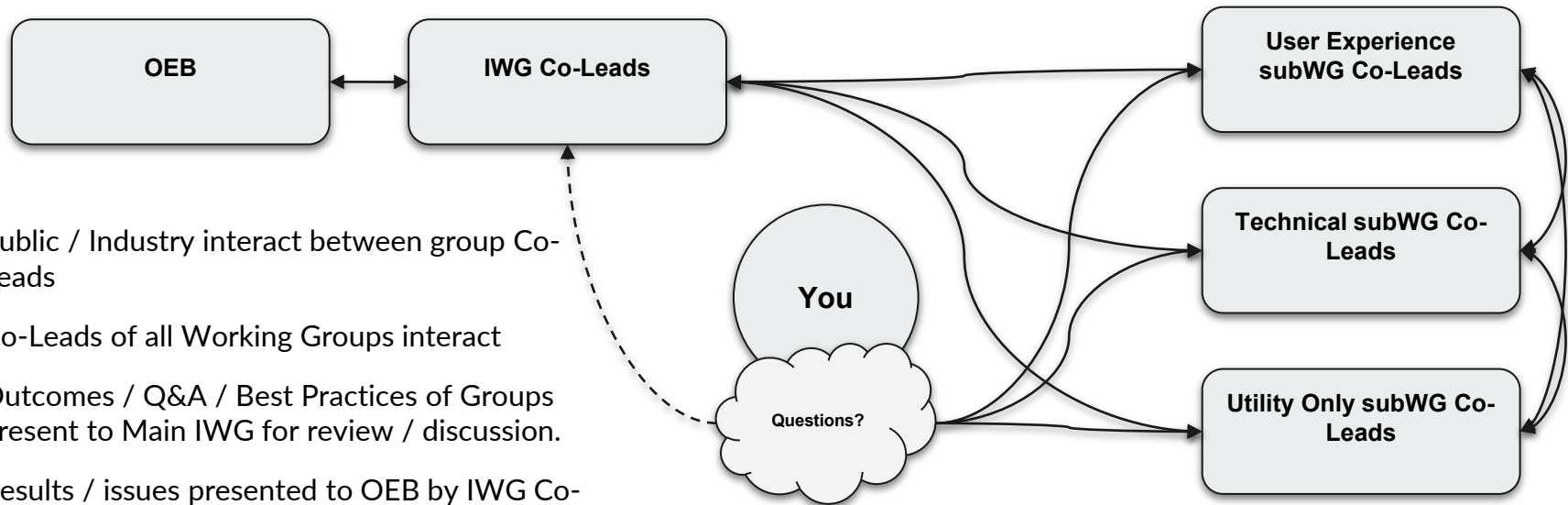
IWG - Agenda for Today

- **OEB Staff – "Land Acknowledgment"**

- **Co Chairs** - Gary, Jeremy, Eddie

- **Administrative** (how is this going to work)

- Discuss implementation - 3rd Party discussions – Last Meeting

- Review Sub Working Group Content

- Focus is on Review Ontario Regulation / Implementation Preparedness

- Review IWG Next Steps and any follow up items From Working Groups–Implementation focused

Administrative - General

- Etiquette. Be respectful and Asking Questions state company & name
- Our next meeting. June 15th
- Summer meetings – Cancel meeting July 13 / Aug 17th
- Re-start - September 14th
- Next Meeting : Implementation Focused and Other priority items.
- 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

- 5 months left

2023 - Inter-Working Group Communications Review

- Public / Industry interact between group Co-Leads

- Co-Leads of all Working Groups interact

- Outcomes / Q&A / Best Practices of Groups present to Main IWG for review / discussion.

- Results / issues presented to OEB by IWG Co-Leads

OEB

IWG Co-Leads

User Experience subWG Co-Leads

Technical subWG Co-Leads

You

Questions?

Utility Only subWG Co-Leads

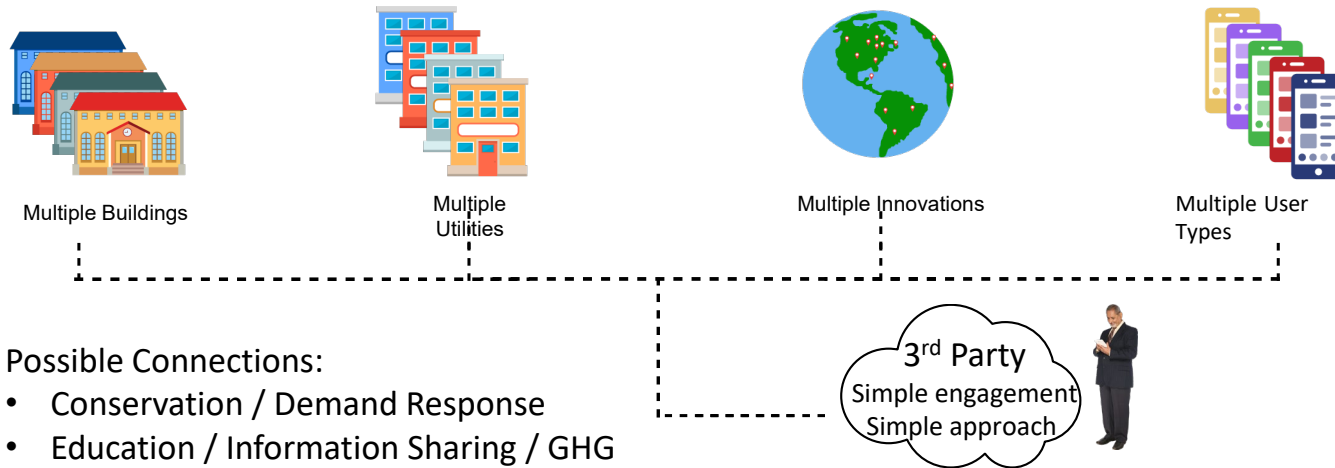# User Experience Sub-Working Group (IUXWG) (Mondays)

- Co-Chairs Michael / Karen / Gary
- Separate Agenda / Discussion from Co-Chairs (Biweekly)
  - Discuss Implementation / Provide Best Practices recommendations, Q&A, Issues list

  - Note: Karen will be away for several weeks. Gary will assist until she is back.

Question Asked: Who are the Third-Parties Innovation, Conservation, Electrification

The 3rd party market is a multi-billion-dollar industry

Utilities are partners in Digitization

How Ontario Utilities engage is important (Outside the Standard)

Multiple Buildings

Multiple Utilities

Multiple Innovations

Multiple User Types

3rd Party
Simple engagement
Simple approach

Possible Connections:
- Conservation / Demand Response
- Education / Information Sharing / GHG
- Virtual Systems / Analysis / Grid Management / Self-healing infrastructures
- Distribution Service Operators (DSOs), Smart Grids, DER's (Distributed Energy Resource)
- Electrification / System Integration / Forecasting
- Banks, etc.

Third Party Demonstrations / Review (From Last meeting)

- Data is used for down stream processes – Key decisions are made
- Data consistency is important – all data (Bill / Meter), all the time
- Missing / estimated - data needs to be understood
- Data History is important – Same data, Corrections to data
- Data is used with other data to create conclusions that effect $$$$
- User experience and simple access is very important.

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.

Independent Utility only (IUWG)
Sub - Working Group

- Co-Chairs Steve / Carrie / Warwick
- Separate Agenda / Discussion from Chair
  - Discuss Implementation / Provide Best Practices recommendations, Q&A, Issues list

Technical Sub-Working Group (ITWG)

- Co-Chairs Ryan / Don
- Separate Agenda / Discussion from Co-Chairs (Biweekly)
  - Discuss Implementation / Provide Best Practices recommendations, Q&A, Issues list

Past IWG OEB Feedback on Implementation in 2023

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 <u>Guidance Letter</u> 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.

Working Group Review of Regulation – Implementation Focus

- Regulation

https://www.ontario.ca/laws/regulation/210633

- Discuss Implementation needs and GBA Certification

IWG
Thank you for your participation

To reach out to the Co-Chairs - Email us