

Submitted electronically to:

Matthew Edwards
Senior Policy Advisor
Ministry of Energy, Northern Development and Mines
Conservation and Energy Efficiency Branch
77 Grenville St., 5th Floor
Toronto, ON M7A 2C1

November 22, 2020

Dear Mr. Edwards,

**Re: ERO Number 019-2564
Regulatory proposal for province-wide implementation of Green Button**

As a leader in the local electricity distribution sector, Alectra is committed to delivering innovative energy solutions that not only create value for our customers, but also help them to take charge of their electricity usage and costs. We know that by enhancing our customers' ability to access their consumption data with new tools, customers will be better able to manage their electricity costs, and further leverage modern grid technologies across the province.

The Ministry of Energy, Northern Development and Mines (MENDM) is considering proposing a regulation to require all Ontario electricity and natural gas utilities to implement Green Button Download My Data (DMD) and Connect My Data (CMD) – together referred to as “Green Button.”

Alectra is pleased to provide this submission to MENDM's regulatory proposal for the requirement of electricity distributors to implement Green Button which contains our comments and recommendations.

Comments and Key Recommendations:

Alectra is supportive of the proposed regulations put forward by the Ministry, as it aligns with our goal of empowering customers to be in control of their energy usage while also focusing on conservation and energy efficiency. We appreciate the opportunity to highlight key areas for your consideration:

Consideration 1: Program Implementation Resources

Alectra understands that while the implementation runway put forth by the Ministry is two years, there are concerns surrounding a single-date implementation province-wide as we are aware this may place a significant strain on resources. These resources include Customer Service teams who will be fielding calls from customers setting up Green Button, as well as resolving IT issues that may arise. Alectra suggests a staggered rollout of the Green Button program in order to alleviate the potential strain on resources for LDCs across the province. This will ensure

that we are able to deliver efficient customer service without long wait times for all customers using Green Button.

Consideration 2: Customer Experience

It is Alectra's view that in order for the Green Button program to be truly beneficial to our customers, it should utilize a simple, user-friendly interface that gives customers self-serve access to their electricity consumption data. To advance the government's objectives on red tape reduction and improving the customer experience related to Green Button, Alectra suggests that utilities will need to account for the cost to integrate "push" notifications into the platform. The ability to provide reliability reports to customers that are relevant to their individual usage patterns would also be useful. We believe that the inclusion of historical usage data would enhance the customer experience of the Green Button program.

Consideration 3: Customer Privacy and Consent

Alectra understands that Green Button Connect My Data (CMD) is expected to allow customers to share their utility data with third-party applications and/or service providers. We believe that CMD should allow customers to provide explicit permission for third-party downloading of usage data. CMD should also contain a tool for revoking consent for any usage data sharing, should the customer wish to opt out at a later point in time. It would be beneficial if this can be done through the utility's online billing portal where customers can access bills and other usage information pertaining to their own accounts.

Consideration 4: Opportunity to Comment on Draft Regulatory Language

Alectra believes the absence of draft regulatory language in the proposed regulation makes it challenging for stakeholders to provide feedback, particularly when the matter deals with back-end technical issues and customer privacy. Alectra suggests that MENDM allow all stakeholders the opportunity to comment on draft regulatory language regarding the Green Button implementation before they are adopted as final regulations. This would allow all stakeholders to evaluate the proposed regulation in detail, while ensuring that the topics discussed are clearly understood and cannot be misinterpreted in any way.

Sincerely,

Indy Butany-DeSouza
Vice President, Regulatory Affairs
Alectra

c.c. Linas Medelis, Acting Vice President, Customer Service