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2 BEFORE THE NEW HAMPSHIRE
3 PUBLIC UTILITIES COMMISSION
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6 DOCKET NO. DE 19-197
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9 DEVELOPMENT OF A STATEWIDE, MULTI-USE ONLINE ENERGY DATA
10 PLATFORM
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15 PREPARED REBUTTAL TESTIMONY OF
16 DEVIN HAMPTON
17 ON BEHALF OF UTILITYAPI, INC.
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30 October 23, 2020
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1 **What is the purpose of your rebuttal testimony?**

2 There are two purposes to my rebuttal. First, I support the “virtualized” approach of
3 Eversource/Unitil known as Option 3 for reasons I explain, because it is superior to a
4 fully centralized repository where all of New Hampshire’s utilities would store customer
5 data in a single location. Second, I respond to Eversource/Unitil regarding the use of
6 nondisclosure agreements and data security requirements, and expansion of the data
7 platform to other utilities.

8 **What is Option 3?**

9 Eversource/Unitil describe Option 3 as an “API of APIs”, where customer data is stored
10 by each individual utility and API access is provided to a central data access platform
11 which then manages the customer consent process and provides data access to
12 authorized third parties. This is similar to a fully centralized statewide repository in that
13 the customer authorization experience and third party registration and data transfer is
14 the same across all supported utilities, and it contrasts in that customer data would
15 remain housed in each utilities' own repository until a customer authorization occurs.

16 **What are the benefits of a centralized repository?**

17 The largest benefit of a centralized system is providing a consistent user experience for
18 both the customer and third parties looking to integrate with the data sharing APIs.

19 **Can those benefits be retained with Option 3’s “virtualized”
20 approach?**

21 Yes, I believe they can, so long as careful attention is paid to certain details, such as
22 consistency between each utility’s customer authorization experience. With the

1 exception of utilities' logos, the authorization web pages that describe to the customer
2 the data to be shared, for how long, and under what terms should be essentially
3 identical in presentation as between the utilities. There should only be one (1) web page
4 for the authorization screen, rather than splitting up the process into multiple, separate
5 web pages. Furthermore, the authorization web pages should be optimized for mobile
6 devices, because customers increasingly conduct daily business on smartphones and
7 tablets. This would permit customer education efforts to be consistent and unified
8 across New Hampshire.

9 **What are the drawbacks to a centralized repository?**

10 When data must be duplicated from one place to another there will be syncing issues
11 that need to be resolved (e.g., meter readings that were previous off and now must be
12 updated to their adjusted values). With a centralized repository, these issue resolutions
13 must be performed for the entire customer dataset, which can be quite costly to
14 maintain on an ongoing basis. With Option 3, only data authorized to be shared must be
15 synced, which significantly reduces the amount of data syncing issues that may occur.

16 **What is your recommendation on this topic?**

17 I recommend that New Hampshire implement a virtualized "API of APIs" consistent with
18 Eversource/Unitil's Option 3. This would provide the greatest benefit to ratepayers by
19 providing a consistent user experience while eliminating the costs and risks associated
20 with centralized data retention.

1 **What do the New Hampshire utilities state about nondisclosure**
2 **agreements (NDA) and data security requirements?**

3 There are numerous requirements. Eversource/Unitil state that third parties would be
4 subject to one or more NDAs, a cybersecurity assessment, audit, and data protection
5 controls.¹ Liberty states that third parties would need to comply with a cyber security
6 review.²

7 **Do you agree with the utilities about these requirements?**

8 No. Many third party companies needing to ask for customer data are small and
9 medium businesses (SMBs). Small companies such as local HVAC installers or energy
10 consultants often do not have the technical expertise or financial resources to meet
11 restrictive NDAs or data security agreements. I believe these types of agreements are
12 appropriate when a utility vendor obtains access to customer data without that
13 customer's verified consent (e.g. to a utility's vendor that provides utility customer
14 engagement platforms), however the data sharing platform being discussed in this
15 docket is one where data access requires individual opt-in consent from a customer,
16 authenticated and recorded by the central authority, where it is made extremely clear to
17 the customer who their data will be shared with (e.g. ABC Energy Consulting). I believe
18 adding overly restrictive NDAs or data security requirements for third parties will
19 effectively prevent many SMBs from participating in the platform, which may give much
20 larger companies an unfair advantage in the energy efficiency, DER, and other markets.

¹ Eversource/Unitil Direct Testimony, page 42-45.

² Liberty Direct Testimony, page 27.

1 **What do Eversource/Unitil state about the expansion of the data**
2 **platform to other utilities?**

3 Eversource/Unitil stated that they believed in the promise of expanding the data
4 platform to other utilities in the region.³

5 **Do you agree with Eversource/Unitil?**

6 Yes, absolutely. In our experience, it is highly beneficial to DERs to have as much
7 consistency as possible between various utilities' data access methods. UtilityAPI exists
8 in many ways in order to conceal utilities' idiosyncrasies from both DERs and their
9 customers.

10 **Does this conclude your rebuttal testimony?**

11 Yes.

³ Eversource/Unitil Direct Testimony, page 43.