

RETHINKING ENERGY DATA ACCESS

Conquering Barriers to Achieve Local Climate Goals

Kelly Crandall

EXECUTIVE SUMMARY

Local governments across the U.S. are aspiring to achieve a variety of complex objectives, which include developing plans to meet long-term climate goals, improving public health, increasing access to energy programs, and enhancing local resilience to extreme weather. Utilities collect energy consumption and program participation data that is not only invaluable to these efforts, but also is often incapable of being duplicated cost-effectively or extrapolated through other means.

Unfortunately, when local governments seek data from energy utilities to assist in their progress—such as aggregated or anonymized data from which all personal information has been removed—they can experience a range of utility and regulatory barriers, including ambiguous or overly restrictive rules around data privacy.

The Institute for Market Transformation (IMT) and the Urban Sustainability Directors Network (USDN) worked with local governments across the country to identify challenges they have in requesting utility data, as well as characteristics of successful data projects. **Rethinking Energy Data Access** synthesizes recommendations for local

governments on how they can work with utilities and utility regulators to reform the ways in which data requested, protected, and shared. Utilities and utility regulators can also use this report to raise internal awareness of local government customers' priorities and needs, engage them around data access, and implement effective data access policies and practices.

How Local Governments, Utilities, and Utility Regulators Can Enable the Use of Utility Data for Critical Public Policy and Research

Local governments differ from other utility data requestors because they seek data to advance critical goals related to sustainability and economic development. These goals may include:

- Setting and monitoring climate goals.
- Achieving deeper energy savings and program participation.
- Promoting local jobs and economic development.
- Reducing energy burden and improving public health.
- Enhancing local resilience to climate change and natural disasters.



Data helps these governments monitor progress and be accountable. Moreover, significant variations across communities in demographics, zoning, land use, and industry mean that city-specific data is necessary to assess the impacts of energy codes, ordinances, and other programs.

Recommendations for Success

With this in mind, local governments should consider the following approaches to improve access to utility data:

- Clearly define the data needed from utilities and explain the purpose for the request. One approach to doing this is to develop use cases which describe the purpose and scope of a data request. This report includes guidance on how to construct a meaningful use case and provides “tear sheets” with five examples of common use cases that local governments can start from.
- Work directly with utilities to ask for data, emphasizing that it must be accurate, available on a regular basis, and replicable for other communities. Consider easing this process by contracting with a trusted entity, like an existing utility vendor or a university, to generate specific outputs with the utility’s permission.
- Engage with utility regulators to propose targeted carve-outs that enable access to data for particular purposes, such as community-wide energy usage data and whole-building energy usage data. Emphasize the model examples and good/better/best practices discussed within this report.
- For local governments that have more resources and are seeking more diverse types of data, consider engaging with utility regulators to explore the applicability of alternative frameworks for providing data, like transferring responsibility for data processing to a non-utility entity like a university or state agency. Recommend that statisticians or computer scientists be engaged in the process of assessing data and recommending privacy-protective practices.

Utilities should consider the following activities to make meaningful data more available to local governments:

- Utilities should not release data—or bar the release of data—without a clear understanding between both the city and the utility as to what is being sought and why.
- Develop a quality control process that minimizes gaps and errors, and notifies data requestors when inaccuracies are identified or the methodology for providing data changes in a substantive way. Recognize that cities’ requests may be ongoing, and ensure that the data is capable of being compared over time, for example, by aggregating customers up to the next highest unit or area, rather than removing them from a dataset.
- Explore memoranda of understanding or non-disclosure

agreements with local governments or trusted entities, like existing vendors or universities, to make data available for analysis while ensuring reasonable protections.

Utility Regulators should consider the following approaches to developing rules and practices for utilities to ensure local governments have access to critical utility data:

- Engage data requestors like local governments, universities, national labs, community-based organizations, and other entities that have public benefit purposes for making data requests.
- Where rules require utilities to adopt specific practices around aggregation or anonymization, consider engaging an independent statistician to assess the data at issue and recommend what those practices should be.
- Recognize the value of public data and require utilities to produce certain high-impact, high-use datasets publicly on a consistent basis, based on stakeholder need.
- Create understandable, logically consistent rules that avoid duplicative requirements, allow multiple data requests, and allow derivations to be created from data.
- Consider creating an appeals process that involves independent third parties and data experts where there is disagreement over whether data is releasable.
- Consider whether utilities should be incentivized for producing datasets for public policy, or whether another entity may be better positioned to manage these kinds of requests. For example, a state agency or university may be a better overseer of data requests because it can leverage expertise in statistics and cybersecurity, and be tasked with working with data requestors to understand and respond to their needs.

For more information and examples of data success stories, see the full [*Rethinking Energy Data Access*](#) report.

