

Integrated Energy Data Resource (IEDR)

IEDR Utility Quarterly Report Q1 2025

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Case 20-M-0082 – In the Matter of the Strategic Use of Energy Related Data

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Report Scope

National Fuel Gas Distribution Corporation (“National Fuel”) submits this Integrated Energy Data Resource (IEDR) quarterly report in compliance with Ordering Clause No. 5 of the Order Implementing an IEDR¹, where the State of New York Public Service Commission (“Commission”) directed utilities² that:

“each utility shall file a quarterly report on Integrated Energy Data Resource enablement project planning and investments, as discussed in the body of this Order, with the first report being due on or before October 31, 2021.”

By its January 19, 2024 Order, the Commission extended utility requirements for quarterly and annual reports at the ends of April, July, October and January for the remainder of Phase 1 and for the duration of Phase 2.³ In compliance with these directives, National Fuel developed the information contained in this IEDR quarterly report for January 2025 to March 2025 (Q1), providing a status of the ongoing and planned projects and investments in support of the enablement of the IEDR.

Utility Coordination Group (UCG)

National Fuel participates in the Utility Coordination Group (UCG) established by the New York State Energy Research and Development Authority (NYSERDA) and Commission Staff to “provide a venue for collaboration, coordination, and oversight of the utility activities related to the design and implementation of the IEDR and alignment with the schedules and activities of the Data Access Framework proceeding (DAF).”⁴ NYSERDA has retained vendors collectively referred to as the IEDR Program Team (Deloitte Consulting, Pecan Street) and the IEDR Development Team (E-Source, Utility API, FluxTailor, TRC Companies, and HumanLogic). Both teams are a part of the biweekly UCG meetings.

In Q1 2025, National Fuel participated in biweekly virtual UCG meetings. The meetings covered the topics noted below:

- Overall progress on the IEDR
- Overall progress on the IEDR platform

¹ Case 20-M-0082, Order Implementing an Integrated Energy Data Resource (issued February 11, 2021), p. 39.

² The Joint Utilities (JU) are: Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., Rochester Gas and Electric Corporation, National Fuel Gas Distribution Corporation, St. Lawrence Gas Company, Inc., KeySpan Energy Delivery New York, and KeySpan Energy Delivery Long Island.

³ Case 20-M-0082, Order Approving Integrated Energy Data Resource Phase 2 Budgets (issued January 19, 2024), pp. 19-20.

⁴ Case 20-M-0082, Integrated Energy Data Resource Program Consolidated Program Charter Pertaining to the IEDR Steering Committee, Advisory Group, and Utility Coordination Group Final Report (issued August 2021), p. 17.

- Green Button Connect (GBC) Deployment Plan, including preparation for the Alpha+ testing stage and configuration of single sign-on (SSO)
- Continued development of the Rate Plan use case and related support activities
- Use case support as needed, including analysis of utilities processes related to transfers of aggregated customer and network data
- Engagement on emerging issues related to customer privacy and opt-out procedures

A summary of key notes from the biweekly meetings are provided below:

- *January 7 – Activity focused on the current state of Phase 2 development areas, notably GBC the December 20 Public Service Commission Order which transitioned utility-reported community-scale energy usage data to the IEDR Platform, and overview of the IEDR Development Team’s proposed process to deliver instant feedback on data deposits of customer and network data.*
- *January 14 – The IEDR Development Team apprised the Joint Utilities (JU) of delays in the GBC testing process and featured continued discussions around both the migration of activities around community-scale energy and aggregated energy usage data (e.g., UER, EIA 861) to the IEDR Platform, as well as the status of feedback on deposits of customer and network data. The JU and IEDR Development Team agreed to initiate a test trial to monitor the result of utility data submissions against the current draft of the data transfer specification and continue discussions in both forthcoming UCG meetings and in one-on-one engagements.*
- *February 4 – The IEDR Development Team informed the JU that activities around community scale energy usage would be paused given the pause initiated by the Public Service Commission.⁵ The JU was provided with a more detailed update on the proposed timeline for GBC testing, with the goal for utilities to complete the go-live portion of testing by the August/September 2025 timeframe. The IEDR Development Team updated the JU regarding its progress on feedback for deposits of network and customer data to the IEDR Platform; the JU reiterated their openness to collaborating with the IEDR Development Teams on this effort. This meeting also introduced the topic of customer data privacy and requests to have information removed from historical IEDR data uploads.*
- *February 18 – The IEDR Development Team presented the proposed GBC Deployment Plan Summary Timeline and indicated that single sign-on (SSO) will be utilized as the sole authentication method until further notice. The IEDR Development Team also notified the JU that it is assessing issues with its data transfer schema which are impacting the pace of feedback on deposits of customer and network data to the IEDR Platform. The meeting concluded with the JU introducing a risk matrix to streamline conversation on the various Phase 2 development areas and challenges. The JU accompanied this matrix with proposals on advancing work related to schema alignment, data deposits, and coordination on the strategic direction of Phase 2 activities.*

⁵ As noted below On January 21, a petition for rehearing was filed in relation to the Commission’s Order Approving Transition of Utility Reported Community-Scale Energy Usage Data (Order) issued in Cases 17-M-0315 and 20-M-0082 by Climate Action Associates LLC (CAA). CAA is asking for the Order to be stayed to prevent ongoing harm to CAA and for the Commission to implement several measures to allow CAA to continue to operate in this space. As a result of the petition, activities related to the Utility Energy Registry (UER) have been paused for the time being.

- *March 4 – The IEDR Development Team indicated that activities around SSO integration were set to begin following the meeting. Separately, the JU notified the IEDR Program and Development Teams regarding delays to the updating of utility rate plan data on the IEDR website. The IEDR Program and Development Teams responded they will work internally and in one-on-one engagements with the JU to ensure more timely updates of data. The meeting concluded with a proposal from the IEDR Development Team regarding a pipeline feedback template for customer and network data deposits.*
- *March 18 – The IEDR Development Team continued discussions with the JU regarding responses for various deposit feedback errors (notably decryption errors) and initiated a discussion around options for data ingestion using the Databricks platform. The JU and IEDR Development Team also discussed the planned April “refresh” of hosting capacity data and potential crossover with other JU working groups examining hosting capacity.*

IEDR Data Availability and Exchange

During Q1, National Fuel and IEDR Development Team continued efforts to support customer access to information through the IEDR Platform, with collaboration focused on the security, data quality, and automation opportunities to enhance the delivery of data pipelines. Activities included the development of several tools to increase customer access to energy related data, including the Rate Plan Data use case, and Customer Data use case (with an emerging focus on feedback from deposited data), and customer privacy and opt-out protocols.

Rate Plan Use Case:

For the Rate Plan Data use case, National Fuel is still waiting for the publication of the new rate plan data specification. The IEDR Development Team is continuing its review of incoming data deposits and the timelines for refreshing utility rate plan data delivered to the IEDR Platform and website.

Data Quality Assurance and Bulk Data

Throughout Q1, the JU and IEDR team are refining efforts to automate the data sharing process beyond the relatively manual process of the utility sharing data with the IEDR team who then must review the data manually and potentially request resubmittal by the utility. National Fuel worked with the IEDR Development Team to map utility processes necessary to improve transfers of customer and network data to the IEDR Platform by focusing on data quality assurance and bulk data exchanges. National Fuel and the JU supported the IEDR Development Team’s trial process for instant feedback on deposits of customer and network data streams throughout Q1.

Customer Data Sharing Opt-Out Requests:

In Q1, the JU led engagement on a new issue related to customer privacy considerations and opt-out procedures for data on the IEDR Platform. Conversations focused on situations in which a customer requests the removal of data from all utility registries, which would include uploads of historical customer data to the IEDR Platform. The JU emphasized both the technical

and legal nature of risks associated with the issue and took an active role engaging the IEDR Development Team and NYSEDA in UCG meetings. NYSEDA is planning to hold internal discussions with legal resources and subject matter experts in conjunction with a review of relevant PSC Orders before reporting back to the JU on the next steps.

Department of Public Service (DPS) Engagement:

On January 21, a petition for rehearing⁶ was filed in relation to the Commission’s Order⁷ Approving Transition of Utility Reported Community-Scale Energy Usage Data (Order) issued in Cases 17-M-0315 and 20-M-0082 by Climate Action Associates LLC (CAA). In their petition, CAA states an opinion that the Order enables the IEDR to directly compete against CAA’s business and other similar businesses. CAA is asking for the Order to be stayed to prevent ongoing harm to CAA and for the Commission to implement several measures to allow CAA to continue to operate in this space. As a result of the petition, activities related to the Utility Energy Registry (UER) have been paused for the time being,

IEDR Projects & Investments

This section includes an update of National Fuel ongoing and planned projects and investments to enable the implementation of the IEDR during Phase 2 implementation.⁸ The projects and investments are organized into three main categories: people, technology, and processes.

1. People

During Phase 1, National Fuel did not make any investments related to new hires or restructuring.

At this time, National Fuel does not have any planned investments related to personnel. National Fuel intends to utilize its internal Information Technology (“IT”) team to develop and implement any system changes that are needed to support the IEDR. National Fuel has Subject Matter Experts (“SMEs”) to assist with ongoing IEDR initiatives. This includes, among others, data SMEs, and IT/cyber SMEs who advise on current system capabilities and potential system modifications. As the IEDR implementation progresses, National Fuel will continue to evaluate and determine whether additional support is necessary.

⁶ Cases 17-M-0315 and 20-M-0082 (filed September 30, 2024, Petition for Rehearing on Behalf of Climate Action Associates, LLC, (filed January 21, 2025).

⁷ Cases 20-M-0082 and 17-M-0315, Order Approving Transition of Utility Reported Community-Scale Energy Usage Data (filed December 19, 2024).

⁸ The Phase 1 cost recovery expectations set forth in the January 19 Order note: “... the Joint Utilities are each ordered to account for the final amounts of their Phase 1 budget caps utilized, and reflect such amounts in the utility’s next quarterly report.” The Commission’s January 19, 2024 Order further clarified that Phase 2 cost recovery procedures begin when Phase 1 is completed. As such, this quarterly newsletter will report on the final Phase 1 costs and transition to Phase 2 costs and plans for the IEDR.

2. Technology

During Phase 1, National Fuel did not make any investments related to technology.

Currently, National Fuel does not have any planned investments related to technology. National Fuel intends to utilize its internal IT team to implement any modifications to its current system that are necessary to support the IEDR. As the IEDR implementation progresses, National Fuel will continue to evaluate and determine whether additional technology investments are necessary.

3. Processes

Throughout Q1, National Fuel participated in weekly meetings of the Joint Utilities related to information sharing work group and IEDR technical work groups, respectively. These work groups provide an opportunity for the Joint Utilities to take a unified approach to various IEDR-related filings and processes. In addition, communication among and decision-making within the work groups ensures more consistency statewide with respect to data sharing and privacy. As the IEDR implementation progresses, National Fuel will continue to evaluate and determine whether new internal processes are necessary.

Schedule

Throughout Q1, National Fuel continued work with the IEDR Development Team on the Phase 2 use cases prioritized by NYSERDA in the Phase 2 Roadmap.⁹ Engagement focused on further development of priority areas determined by the IEDR Development Team, including the Rate Plan Data use case, activities related to data quality and assurance and bulk data exchange, as well as emerging topic areas around customer data privacy and IEDR program execution.

National Fuel collaborated with the IEDR Development Team in UCG meetings, held during Q1 as part of the JU. As a group, the JU was proactive in outreach to the IEDR Program Team and IEDR Development Team to maximize engagement and ensure progress on the development of the IEDR Platform. The JU developed and shared a “Risk Matrix” organizing and characterizing potential Phase 2 development risks with the IEDR Development and Program Teams throughout UCG meetings in Q1.

For the Rate Plan Data use case, the IEDR Development Team is currently reviewing the Rate Plan Data schema and looking to support the implementation of consistent cost-estimating tools across New York State.

The JU also focused Q1 activities on consistency and quality of data delivery pipelines and bulk data exchange solutions to support the proposed Phase 2 use cases. These activities included

⁹ Phase 1 of the IEDR Platform was completed by March 28, 2024, as described in [NYSERDA's press release](#). The NYSERDA Phase 2 Roadmap set forth a preliminary schedule for use case deployments in 2024. Case 20-M-0082, Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data, Integrated Energy Data Resource Program Phase 2 Proposal, Prepared by New York State Energy Research and Development Authority (NYSERDA) (filed May 12, 2023).

the development of a trial process to review feedback on utility deposits of customer and network data to support Phase 2 use cases, which National Fuel supported throughout Q1.

As noted in the Q4 2024 Progress Report, the JU met with the Department of Public Service (DPS) in Q4 2024 to discuss IEDR Phase 2 cost recovery and tariff consistency issues. Following these meetings, the JU filed a petition for clarification¹⁰ on October 31. On November 19, the Commission issued an Order Approving Tariff Amendments,¹¹ which continued action originating from the October 13, 2023 issuance of the IEDR Order¹² directing the JU to file proposed tariff revisions related to liability for unauthorized or inadvertent disclosures of data from the IEDR Platform. National Fuel filed its Phase 2 compliance filing prior to the start of Q1 2025.¹³

Budget

National Fuel incurred no labor costs during the reporting period.

1. Economies of Scale

At this stage, National Fuel has not yet identified any prospective economies of scope or scale for existing utility planning, operations, and Distribution System Implementation Plan (DSIP) data responsibilities that can be achieved because of the IEDR implementation.

2. Quarterly Costs

National Fuel does not have any quarterly cost updates to share at this time.

3. Annual Costs

National Fuel does not have any quarterly cost updates to share at this time.

4. Project Cost to Date

The total Project Cost as of the date of this report is \$0, as National Fuel utilized existing resources throughout Phase I and thus far in Phase

Next Steps

National Fuel plans to continue work with both the Joint Utilities and the IEDR Development Team to refine a Phase 2 project plan. Anticipated activities include further investigation on

¹⁰ Case No. 20-M-0082, Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data, JU IEDR Phase 2 Cost Recovery Petition (filed September 30, 2024).

¹¹ Case 20-M-0082, Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data (issued November 19, 2024).

¹² Case 20-M-0082, Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data (issued October 13, 2023).

¹³ The utility filings were posted to: [NYS DPS-DMM: Matter Master](#).

National Fuel's ability to connect with the GBC platform, enhancements regarding the efficiency and consistency of data transfer pipelines, resolution of discrepancies in nodal data uploads and quality assurance for deposited data, continued progress on the process necessary for the Rate Plan Data use case, and ongoing collaboration with the IEDR Development Team and IEDR Program Manager on issues related to customer data sharing opt out requests.

National Fuel plans to continue to undertake IEDR program support activities, including ongoing data transfers to the IEDR, potential implementation of single sign-on (SSO) functionality, and other related tasks, specifically in relation to Production GBC. The JU plans to maintain engaged as a participant in the IEDR Program and the ongoing Phase 2 development activities. To facilitate all these activities and reduce delays, efforts will continue to focus on automating the data transfer process with tools to provide feedback on the data provided and mechanisms to promote high-quality data ingestion for data sent to the IEDR platform.