

December 7, 2023

VIA ELECTRONIC MAIL

Honorable Michelle L. Phillips
Secretary
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223-1350

RE: Case 20-M-0082 – Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data

REQUEST OF THE JOINT UTILITIES, NYSERDA, AND E SOURCE FOR AN EXTENSION REGARDING THE FINALIZATION OF DATA SHARING AGREEMENTS NECESSARY TO COMMENCE DATA TRANSFER TO THE IEDR PLATFORM

Dear Secretary Phillips:

Pursuant to the October 13, 2023 *Order Addressing Integrated Energy Data Resource Matters* in the subject proceeding (“Order”), the Public Service Commission directed each of the Joint Utilities¹ to finalize with the Integrated Energy Data Resource (“IEDR”) Administrator the data sharing agreements necessary to begin the transfer of data from each of the Joint Utilities to the IEDR platform within sixty (60) days of the Order issuance (*i.e.*, by December 12, 2023).² On November 17, 2023, the Joint Utilities provided a redlined data sharing agreement to the IEDR Administrator, E Source LLC (“E Source”), for their consideration. E Source provided its response to the redlined data sharing agreement on December 5, 2023. Although each of the Joint Utilities and E Source are committed to working collaboratively to resolve differences and finalize the data sharing agreements that will allow for customer data sets and system data to be transferred to the IEDR platform, it is not possible at this juncture to meet the December 12, 2023 deadline established in the Order. The approaching holidays will further complicate securing individual utility signatures on the agreement once it is in final and executable form.

¹ The Joint Utilities are Central Hudson Gas & Electric Corporation, Consolidated Edison Company of New York, Inc., New York State Electric & Gas Corporation, National Fuel Gas Distribution Corporation, The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, Niagara Mohawk Power Corporation d/b/a National Grid, Orange and Rockland Utilities, Inc., and Rochester Gas and Electric Corporation.

² Case 20-M-0082, *Proceeding on Motion of the Commission Regarding Strategic Use of Energy Related Data*, Order Addressing Integrated Energy Data Resource Matters (issued October 13, 2023), pp. 16-17, and Ordering Clause No. 4, pp. 17-18.

Upon conferring with Department of Public Service (“DPS”) Staff, the Joint Utilities believe that an extension of the date for commencing the transfer of customer data to the IEDR Platform to January 9, 2024, which is eighteen (18) business days from the date established in the Order, is appropriate. Granting such an extension should allow sufficient time to finalize the data sharing agreements and secure needed signatures from each of the Joint Utilities and E Source which is a prerequisite to commencing data transfer to the IEDR Platform.

The Secretary is granted the discretion to extend deadlines established in the Order.³ The Joint Utilities, New York State Energy Research and Development Authority (“NYSERDA”) and E Source hereby respectfully request an extension to January 9, 2024 to commence the transfer of data to the IEDR platform. The Joint Utilities will continue to keep DPS Staff informed on progress.

As the Order specifically required that a joint letter be submitted to the Secretary explaining the reason for any delay and providing an estimated timeframe as to when the data transfer to the IEDR platform can begin, this letter is intended to additionally satisfy that requirement.⁴

Thank you for your consideration in this matter.

Respectfully submitted,

On behalf of the Joint Utilities

/s/ Janet M. Audunson

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³ *Id.*, p. 18, Ordering Clause No. 5.

⁴ *Id.*, pp. 16-17, and Ordering Clause No. 4, pp. 17-18.

Hon. Michelle L. Phillips, Secretary
Case 20-M-0082 – Joint Utilities’ Request for Extension Regarding the Finalization of Data Sharing
Agreements Necessary to Commence Data Transfer to the IEDR Platform
December 7, 2023
Page 3 of 3

E Source

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