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State of New Jersey
Board of Public Utilities
Sherri L. Golden, Secretary of the Board
44 South Clinton Ave., 1st Floor
Trenton NJ 08625

RE: IN THE MATTER OF THE IMPLEMENTATION OF FEDERAL INFLATION REDUCTION ACT HOMES (HOME EFFICIENCY REBATES) AND HEEHR (HOME ELECTRIFICATION AND APPLIANCE REBATES) PROGRAMS

DOCKET NO. QO23100733

NJBPU:

Please accept the following comments from UtilityAPI in response to the December 13th HOMES/HEEHR Energy Efficiency Incentives Technical Conference.

UtilityAPI is a software company on a mission to unleash the clean energy revolution by unlocking data. We accomplish this by developing and deploying software that collects, standardizes, and shares consumer utility data with organizations working to ignite a clean energy future for everyone.

UtilityAPI currently provides utility data access services in 39 states, including New Jersey. In 6 states, we have partnered with seven utilities and one state energy office to provide these data access services via a dedicated data access platform at no cost to consumers, companies, governments, or non-profits.

In the context of the HOMES and HEEHR, UtilityAPI aims to partner with State Energy Offices, like New Jersey's, to eliminate confusion and barriers that a state may face when enabling the customer utility data access needed to implement both rebate programs. As subject matter experts on the topic, UtilityAPI can support the development of New Jersey's data access plan and deploy a statewide data access platform that enables all New Jersey residents to participate in HOMES and HEEHR.

New Jersey can use HOMES and HEEHR to Break Down the Barrier of Utility Data Access, establish Partnerships, and Create a Simplified Experience for Consumers and Contractors

New Jersey's HOMES and HEEHR programs should enable equitable access to program funding by eliminating barriers that may limit participation. Historically, this has meant providing additional

funding to overcome health, safety, or structural barriers faced in an individual home. While it is clear from the December 13 Technical Conference that health and safety barriers remain an important consideration, the IRA Rebate programs present new challenges as well.

For example, the HEEHR program's rebate eligibility is based solely on a household income level, and the HOMES program rebate value is based on the amount of energy savings and household income level. The requirements surrounding these considerations are complex. NJBPU may find that investment in software solutions to address these requirements frees valuable capacity for other program work.

UtilityAPI encourages NJBPU to explore tools that ease its responsibility to meet the following program specifications:

1. household income verification;
2. energy savings modeling in compliance with the BPI-2400 standard;
3. energy efficiency certification;
4. program reporting required by the Department of Energy; and, of course
5. *utility data access*.

NJBPU can support contractors and aggregators in hard-to-reach communities by simplifying access to utility data, thus enabling more accurate estimates of energy and utility bill savings in advance of energy projects; and more accurate measurement of realized energy and utility bill savings following all energy projects. With this increased accuracy, contractors are able to better serve New Jersey rebate-seekers.

By easing access to utility data, and overcoming what is perceived by the market as an insurmountable barrier, NJBPU will increase the number of projects contractors and aggregators complete and decrease the energy burden for New Jersey residents, especially in disadvantaged communities.

Utility Data is Key to helping New Jersey residents make Informed HOMES and HEEHR Decisions

It was clear during the December 13 Technical Conference: NJBPU wants to equip New Jersey residents with a no-hassle resource for decision-making under HOMES and HEEHR programs. New Jersey consumers need to understand the energy and cost savings that will result from any energy project pursued under the HOMES or HEEHR programs. A foundational piece of this understanding is utility data. Ensuring that consumers, contractors, and aggregators have a simple and secure way of accessing utility data is a key educational resource, especially for the HOMES program.

Without consumer utility data, contractors and aggregators cannot estimate the utility bill impacts of proposed upgrades accurately. A contractor's inability to accurately inform the consumer will impact the consumer's ability to trust the contractor and as a result will limit participation in the NJBPU HOMES program.

On the other hand, access to a consumer's utility data, particularly energy usage, costs, and rate information, empowers energy service providers and contractors to more accurately estimate utility bill impacts of the consumer's investment. More accurate estimates can be used to inform the homeowners who are making energy improvement decisions in ways different from past programs.

Given the importance of utility data access in estimating and validating utility bill cost impacts, UtilityAPI recommends that NJBPU explore developing and deploying a statewide data access platform to support the HOMES and HEEHR programs. This platform would standardize and simplify how consumers digitally authorize and share their utility data with contractors and aggregators. With access to data granted, contractors and aggregators can more accurately estimate energy savings in advance of projects. These accurate energy savings estimates can be readily shared with consumers. Consumer participation will increase. Finally, the access to utility data will allow the contractor to monitor the utility bill impacts post-project. When those post-project energy savings align with the energy savings estimates that informed the consumer's decision, NJBPU will have achieved increased consumer confidence in the HOMES program and future NJBPU energy efficiency programs that employ utility data.

With utility data access NJBPU will have a more accurate, comprehensive picture of how successful HOMES was for New Jersey residents. This is important for reporting to DOE, but also for informing existing and future NJBPU energy programming.

NJBPU can impact Energy Burden through Utility Data Access

Access to standardized utility data used to inform energy efficiency and electrification projects under NJBPU's HOMES program is key to ensuring that all New Jersey residents decrease their energy burden through participation.

Using utility data to more precisely calculate the potential energy savings, utility bill reductions, and the simple payback period of an energy investment will empower New Jersey consumers to navigate the programs differently than they would be able to without such data. More accurate predictions will also help inform New Jersey residents about the risk an energy efficiency or electrification upgrade will increase their utility bills.

Data Access with UtilityAPI is Seamless to the Consumer

The New Jersey consumer experience accessing rebates under HOMES and HEEHR needs to be seamless. UtilityAPI works to ensure that accessing utility data is seamless not only for the consumer, but also for the contractors, aggregators and administrators involved.

The UtilityAPI statewide data access platform would provide NJBPU with a white-labeled consumer-facing interface that advances NJBPU's HOMES and HEEHR program design and objectives. From a NJBPU-branded homepage, New Jersey consumers will be able to view a dynamic, curated directory of third-party contractors that have been approved by NJBPU. Consumers may also read information about what the data sharing platform does and how it works as it relates to HOMES and HEEHR. The platform would enable approved third-party contractors to request data from New Jersey consumers through the custom user interface or fully-documented self-service APIs. Consumers can login to the platform to validate their identity, authorize data access, view their existing authorizations and revoke those authorizations if desired. Throughout this process, NJBPU or its administrator has control over the ability of third parties to request data access from New Jersey rebate seekers. In an effort to minimize confusion and overwhelm, UtilityAPI remains invisible to the consumers the platform would serve.

UtilityAPI aims to work with the program administrator selected by NJBPU to roll data access into the larger delivery platform that connects New Jersey consumers to incentives and rebates.

Utility Data Access is Secure & Private with a UtilityAPI Statewide Platform

UtilityAPI is committed to ensuring the safe and secure handling of private consumer data. UtilityAPI's founder, Daniel Roesler, helped develop the Green Button standard. UtilityAPI received a United States patent for its "split-stack" architecture–a secure method for third-party contractors to obtain authorization via electronic form to interact with a utility on a utility account holder's behalf. UtilityAPI's split-stack architecture allows third parties to locate and collect an account holder's energy usage and billing data, and process and store the data using the highest security measures.

Here's how UtilityAPI leads the industry in setting best practices for securely exchanging consumer utility data:

- SOC 2 Type II compliant, audited annually (2023 latest)
- Active participant in the OpenADE working group, which writes the Green Button standards
- Early adopter of the U.S. Dept of Energy DataGuard Energy Data Privacy Program
- Annual independent third-party penetration tests
- All data in transit is encrypted using modern ciphers (TLS 1.2+)
- All data is encrypted at rest using strong symmetric (AES) encryption
- Geo-specific data location (US data is stored in US, no overseas access or contractors)
- Support for Utility-specific Multi-factor authentication (MFA)
- Self-service and zero-downtime secret rotation for third-party contractors
- Session timeouts for energy consumers and third-party contractors
- Support for auditing customer authorizations, third-party contractor requests, and administrative history

To learn more about UtilityAPI and our data access solutions, please contact Chad Kruse, UtilityAPI's Director of Public Sector Engagement, at chad@utiltiyapi.com.