

Attachment 5

Utility Data Access Plan

State of Wisconsin Home Energy Rebates Home Efficiency Rebate (HOMES) Program

The State of Wisconsin selects option A2. Opt-In: Direct Utility Data Provision and Section A3. Opt-In: Residents/Owners. The sections below describe those options along with answers to the DOE questions on these options. DOE provided information is italicized.

Section A2. Opt-In: Direct Utility Data Provision

Pathway Background

In this pathway, states work directly with utilities to collect energy consumption data based on a customized approach to transfer data so that data is made available to program implementers, contractors, and/or aggregators.

There are multiple ways that a state may work effectively with utilities located in their state including:

- Coordinate directly with utilities on multiple program aspects, including program implementation, braiding of program resources, and energy consumption sharing.
- Create data sharing agreements with utilities, including memorandum of understanding or other such agreement based on the abilities of utilities to transfer participating customer data for the program. States may want to consider creating financial incentives for utilities to balance the effort and time required to share the data and increase the benefits for customers from more detailed data access.¹
- If relevant, work with regulators to require utilities to provide data to the state program and also receive cost recovery for the effort required.

For individually-metered multifamily properties, states could work out a special arrangement with utilities to conduct the whole-building aggregation in order to meet the opt-in provisions. Additionally, utilities may support the states by providing Geographic Aggregation data for pre-participation targeting purposes, see [Section C](#).

¹ DOE recommends that States reach out to utilities' contacts in government affairs, energy efficiency, or retail procurement. Most retail procurement teams at utilities have experience providing usage data to third parties.

Table 1. Opt-In: Utility Pathway Summary

<i>Advantages</i>	Utility provision of data is lower cost than some other pathways. This pathway allows utilities to control the costs of implementation. It requires customizable formats and protocols so that data can be tailored to the goals of the state, provided they meet minimum DOE Requirements. This pathway is easy for customers and avoids the need to monitor third parties on behalf of customers.
<i>Challenges</i>	One challenge with utility provision of data is that it requires states and utilities to collaborate to share data, which may be difficult given the number of utilities and existing relationships between entities in the state. Another challenge is lack of established protocols, which is exacerbated if a state has multiple utilities with which to work on the program. Data is unlikely to be provided in a consistent, standardized format, making it harder for third parties and government bodies to review or aggregate on a statewide basis. Third-party innovation may be minimized by the utilities' control of the data. The level of detail or frequency is likely to be updated less frequently than other pathways.
<i>Home Efficiency Rebates Program Consideration</i>	For both Section 50121 (Measured and Modeled) programs, this pathway provides Evaluation/Implementation data. Note: For multifamily properties, the Modeled program allows exception in modeling because BPI-2400 applies only to single-family homes. To support pre-participation targeting, states should also work with utilities to collect Geographic Aggregation data (See Section C).

Data Access Plan Template

[If your state plans to use an opt-in utility data pathway, please answer the following questions]

Intro and Overview of Data Access in Your State

1. Confirm your state plans to collect energy consumption data directly from utilities for at least some program options. (If no, then please refer to the general overview and pathway sections to determine correct pathway and template for completion)
 - Yes
2. Identify the Home Efficiency Rebates Program(s) that your state plans to use this pathway and home type for:
 - Modeled, Single-family
 - Modeled, Multifamily
 - Measured, Single-family
 - Measured, Multifamily
3. Identify the utilities from which your state will collect energy consumption and billing data.

The State of Wisconsin will collect energy consumption and billing data from all 120 electric utilities and 10 natural gas utilities that operate and provide services to state residents. A list and map of the utilities can be found [here](#). This list includes a broad range of utility partners (Investor-Owned Utility (IOU), municipal utilities, co-operatives, and underscores the flexible nature of the states plan to provide solutions for all potential customers across different service territories.

4. Describe any existing program activities, platforms or agreements that are in place in your state that enable the collection of data directly from utilities.

Customers participating in Focus on Energy, Wisconsin utilities' statewide program for energy efficiency and renewable energy, sign a utility authorization form¹, consenting utilities to release consumption and billing data to the program when consumption and billing data is required for an incentive application. The authorization form collects the utility customer's name, premise address(es), account number(s), meter number(s), and usage type. Focus on Energy staff email the form to the utility to acquire the utility data. Historically, utility data exchange has primarily occurred with commercial customers that complete larger, custom energy efficiency projects.

Home Energy Plus (HE+), which includes the Wisconsin Home Energy Assistance Program (WHEAP), Weatherization Assistance Program, and HE+ Program Services, has agreements in place with the state utilities to provide utility data. Customers consent to the sharing of their data as part of the enrollment application. Utility data for applicants with an open, active account with one of Wisconsin's five large investor-owned utilities (IOU) is provided via a Wisconsin Energy Fuel Information (WEFI) web services call. The WEFI web service will return all available cost and consumption and billing data for the application address and confirm electric and/or natural gas account numbers. HE+ has agreements with the non-IOU utilities to provide required utility data for applicants.

¹ [Focus on Energy Utility Customer Authorization Form](#)

5. Provide an overview of your state program's processes and entities that will gain consent, collect, transfer, and maintain the energy consumption data as provided by residents and owners. Examples of responses could include, but are not limited to:

- a. Consent will be requested of [owners and/or residents] and documented by [eligible parties e.g., program staff, home auditors] in the form of [a participation agreement].
- b. Energy consumption data will be requested from [utilities] and collected by [this system, in this format].
- c. Energy consumption data will be transferred from utilities via [this secure protocol] into the [INSERT NAME] secure system used by the [program staff, state staff, other].
- d. Energy consumption data will be maintained and stored in the [INSERT NAME] secure system and maintained by the [program staff, state staff, other].
- e. Individual energy consumption data will be provided to. [only eligible parties] in [the following instances such as for conducting the program requirements].
- f. Transfer to DOE: The [System/Process] will transfer data to DOE using the following protocols.

The State of Wisconsin will clearly communicate utility consumption and data requirements to applicants, partners, and contractors participating in the Home Efficiency Rebates program (hereinafter referred to as the HOMES program).

Wisconsin residents will be asked to provide their energy utility name(s) and account number(s) as part of the application intake process to reserve funding for their rebate, along with providing consent to program access of their utility consumption and billing data. This consent will confirm an understanding from the customer that they are authorizing the following:

- Their energy utility(s) to provide details on their account, including the past 12 months of usage and 12 months of usage post project completion.
- The utility account details provided can be shared with their selected contractor(s) and program partners, as needed.
- The utility account details can be shared with Focus on Energy to facilitate the application for applicable Focus on Energy rebates.

Energy consumption data will be requested in one of two ways. WEFI is a secure platform developed by the Wisconsin Department of Administration in conjunction with the five large investor-owned utilities to provide access to energy data for delivering energy assistance services to Wisconsin residents. The consumption and billing data for customers of these five utilities will be accessed through a WEFI web services call. Approximately 80% of customers' usage will be accessed via this method. Consumption and billing data for customers of utilities that do not utilize WEFI will be requested via phone call or secure email. Utilities will provide the utility data via email or over the

phone, with the requestor entering the utility data in a provided template. Emails must be encrypted and/or have password-protected file attachments.

Wisconsin has a large number of energy utilities operating within the state and no law requiring utilities to provide energy data to third parties, therefore the State plans to accept the consumption and billing data in the format the utility is able to provide it in. The data will be converted to HPXML for sharing and reporting purposes.

It is anticipated that the program partner requesting and providing the utility data will have access to the HOMES program implementer's system and will be able to upload the data directly to the customer's account. If access cannot be provided, the energy consumption and billing data will be transferred to the HOMES program implementer's system via API or STFP. The data is stored within an AWS S3 bucket with access limited to the site owner. Access to sensitive documentation (including customer utility data) will not be stored on CRM or program management system; this data will be stored within a secure S3 bucket limited to administrator access. Staff working on applications will see a link to view the document but are unable to directly access the document. Access to each customer's energy data is provided as links to the stored document(s). Access to the energy data will be provided to the following:

- The Assessor completing the energy modeling on the customer's home.
- Program staff as needed for program implementation and/or customer assistance. Systems used to deliver the program will rely on role-based permissions access to provide configurable, secure access and functionality based on user type.
- Program evaluator for program evaluation activities, including monitoring of the reliability of the models and tools.
- Focus on Energy upon the completion of the project to assist in the application for applicable rebates.

The transfer of data to the DOE is pending, dependent on the completion and functionality of an API currently in development. The decision on the protocol for data transmission to the DOE will be informed by the upcoming release of beta v3 of the API, which is being tested by Focus on Energy staff. Data transfer would entail use of the provided API or DOE-provided reporting template.

Energy consumption and billing data for multifamily properties will follow one of three paths. Each path requires the property owner to also authorize

release of the utility data for common areas and/or shared building use, such as a centralized HVAC system.

- Small multifamily properties, consisting of 2-4 units, will follow the same path as single family residents. Utility data must be provided for each unit and the common areas of the building. The utility account holders of each occupied unit must authorize the release of their utility data for program use.
- Larger multifamily buildings, consisting of 5 or more units, will be able to provide utility data via one of two methods.
 - If the property's utility is able to provide aggregated data for the property, aggregated energy data will be the preferred method of utility data. Multi-family property owner will post notice to tenants that a modeled savings project is being pursued and aggregated utility data is being collected for program use. A notification template containing all relevant terms and conditions will be provided to the property owner.
 - In situations where aggregated data is not available, utility data from 50% of occupied units must be collected. Tenants will complete a utility release form to authorize collection of utility data in cases where the property manager is not able to access the unit's utility account or the tenant is responsible for paying the utilities.

Security and Safety of Energy Consumption Data

6. Describe how your state will ensure that any data are transferred and maintained safely and securely, using established standards. Describe:
 - Encryption methods for data transfers
 - Protection of data collected and stored.
 - Protocols in place for security guidelines and data classification.
 - How the entity responsible for administering the program will notify a customer if there are data breaches or other security related events.

The State of Wisconsin will adhere to all policies and standards set by the Wisconsin Division of Enterprise Technology² for information systems and environments used in the delivery of the HOMES program as documented in the Privacy and Security Risk Assessment blueprint.

In addition, Focus on Energy has a detailed Policy Manual³ and existing procedures regarding data transfer and integrity that will be incorporated into the HOMES program manuals. New vendors, and contractors, must complete compliance

training and execute the Compliance Certification before receiving access to HOMES data systems. Staff must be re-certified annually.

All involved data systems for the HOMES program have not been identified. The State of Wisconsin is planning to use Secure File Transfer Protocol (SFTP) and APIs to securely transfer data. Encryption methods will be provided upon finalization of all data tools and systems.

Wisconsin Statute 134.98⁴ details the data breach notification requirements for the State of Wisconsin. The Public Service Commission will be responsible for the coordination for reporting and communicating any confirmed data breaches to the public and/or DOE, as required. Individuals impacted by the data breach will be contacted via letter or email, notifying them of the data potentially comprised and what steps they can take to protect their information.

² <https://det.wi.gov/Pages/policies.aspx>³ [FOCUS-2024-Policy-Manual-Final.pdf \(focusonenergy.com\)](#)

⁴ <https://docs.legis.wisconsin.gov/statutes/statutes/134/98>

Consent, Notification, and Revocation Process

7. Confirm that all residents/owners will provide their consent for energy consumption data to be transferred to the state from their utility.

Yes

No. Describe the state's alternative consent approach.

Data Details and Frequency

8. Indicate the timing of energy consumption data to be collected. If multiple options are selected, indicate those use cases:

Monthly _____

Hourly _____

Daily _____

Other (specify) _____

9. Indicate the frequency for energy consumption data be collected by the program (i.e., when will data be available for the program).

At the time of program intake for each participant _____

At a set duration agreed to by the program and utility (please define duration)

Other (specify) _____

Primary and Secondary Purpose

10. Please describe the primary purpose(s) of the energy consumption data.

- Implementation and reporting data for the program.
- Please describe any other primary purposes, if applicable (e.g., building benchmarking, emissions reductions etc.).

The primary purposes of the energy consumption data are implementation, data reporting, and evaluation of the program.

11. Describe any secondary purposes² of the energy consumption data and the entities that it will be provided to. (e.g., data will be provided to third parties to offer additional services like demand response initiatives, or other state-based programs).

The energy consumption data will be provided to Focus on Energy upon either the completion or cancellation of the project to assist the customer in the pursuit of applicable rebates and other energy saving opportunities for their home within the Focus on Energy program.

12. Identify if the program plans to Geographically Aggregate program data collected from utilities and provide it publicly.

No

Yes. Describe how data will be aggregated and anonymized and how it is intended to be published.

Eligibility, Oversight, and Enforcement of Third Parties

13. Describe the eligibility criteria for third parties to access energy consumption data collected from utilities (e.g., contractual agreement with the state or program implementer that requires data security and privacy).

² Secondary purposes may include the use of customer data in outreach and education and additional product offerings that the customer does not already receive or has not authorized. Examples of secondary purposes may include targeted advertising for other energy equipment and sharing data with a third party for a service not included in the State program.

The State will establish data security and privacy provisions to be included in contracts for all partnering entities that will have access to energy consumption and billing data.

Qualified contractors participating in the program will agree to the Participation Agreement, which will include data security and privacy provisions.

14. Confirm that the entities with access to energy consumption data will only use the data as approved for program purposes.

Yes

No. Describe the entities and purposes of their use of the data and how consent was obtained for these purposes.

Section A3. Opt-In: Residents/Owners

Pathway Background

In this pathway, the program collects data from the homeowners, tenants, or building owners directly. The program would likely request copies of metered energy consumption bills, either in paper format or electronically directly from homeowners, tenants, or multifamily building owners. There may be other innovative ways for the program to access the data, such as a third-party access of energy consumption data of program participants.

For individually metered multifamily buildings, this data collection may be especially difficult, especially for properties with a large number of units. DOE recommends using the exception path for Home Efficiency Rebates Modeled approach for these properties (See Section 3.2.4 in DOE’s Program Requirements³).

Table 2. Opt-In: Owner Provision of Data or Access

<i>Advantages</i>	This pathway requires data to be collected onsite, and therefore it may have a lower cost for setup, including the protocols and agreements of previously described pathways.
<i>Challenges</i>	Data must be collected onsite, which is limited by data availability, may be time consuming, and requires a manual process for collecting and entering data, a step that is prone to user error. There is limited automation to increase efficiency over time, and new data requests require training of onsite auditors.
<i>Home Efficiency Rebates Program Considerations</i>	<p>For Section 50121- Modeled programs: For single-family homes, calibration consistent with BPI-2400 allows for energy consumption data at a monthly data or annual level, which provides flexibility in collecting data from residents/owners.</p> <p>For multifamily properties, the Modeled program allows exception in modeling because BPI-2400 applies only to single-family homes.</p> <p>For Section 50121- Measured programs: Energy consumption data will need to be collected both prior to and one year after installation.</p> <p>To support pre-participation targeting, states should attempt to work with utilities to collect Geographic Aggregation data (See Section C).</p>

³ [Home Energy Rebates Programs Requirements & Application Instructions](#)

Data Access Plan Template

[If your state plans to use an opt-in residents/owners pathway, please answer the following questions]

Intro and Overview of Data Access in Your State

1. Confirm your state plans to collect energy consumption data directly from residents/owners. (If no, then please refer to the general overview and pathway sections to determine correct pathway and template for completion)

Yes

2. Identify the Home Efficiency Rebates Program(s) that your state plans to use this pathway and home type for:

Modeled, Single-family

Modeled, Multifamily

Measured, Single-family

Measured, Multifamily

3. Describe any existing program activities, platforms or agreements that are in place in your state that enable the collection of data directly from owners.

Customers participating in Focus on Energy, Wisconsin utilities' statewide program for energy efficiency and renewable energy, are able to directly provide their energy consumption and billing data for projects that require this information. The Applicant's signature on an Application constitutes the Applicant's consent for its electric and/or natural gas utility to disclose the Applicant's energy usage data directly to Focus on Energy, per the Terms and Conditions of the program⁵. Historically, programmatic utility data collection has focused on commercial properties due to the nature of energy efficiency upgrades undertaken.

⁵ <https://focusonenergy.com/terms-and-conditions>

[Focus on Energy Utility Customer Authorization Form](#)

Home Energy Plus (HE+), which includes the Wisconsin Home Energy Assistance Program (WHEAP), Weatherization Assistance Program, and HE+ Program Services, has agreements in place with the state utilities to provide utility data. Customers consent to the sharing of their data as part of the enrollment application. Utility data for applicants with an open, active account with one of Wisconsin's five large investor-owned utilities (IOU) is provided via a Wisconsin Energy Fuel Information (WEFI) web services call. The WEFI web service will return all available cost and consumption and billing data for the application address and confirm electric and/or natural gas account numbers.

HE+ has agreements with the non-IOU utilities to provide required utility data for applicants.

4. Provide an overview of your state program's processes and entities that will collect, transfer, and maintain the energy consumption data as provided by residents and owners. Examples of responses could include, but are not limited to:
 - a. Consent will be requested of [owners and/or residents] and documented by [eligible parties e.g., program staff, home auditors] in the form of [a participation agreement]
 - b. Energy consumption data will be collected by [program staff, home auditors] in the form of [paper bills, access to utility bills through electronic means]
 - c. Energy consumption data will be [transferred to, uploaded] into the [INSERT NAME] secure system used by the [program staff, state staff, other]
 - d. Energy consumption data will be maintained and stored in the [INSERT NAME] secure system used by the [program staff, state staff, other].
 - e. Individual energy consumption data will be provided to [only eligible parties] in [the following instances such as for conducting the program requirements]
 - f. Transfer to DOE: The [System/Process] will transfer data to DOE using the following protocols.

The State of Wisconsin will clearly communicate utility consumption and data requirements to applicants, partners, and contractors participating in the HOMES program.

Wisconsin residents will be asked to provide their energy utility name(s) and account number(s) as part of the application intake process to reserve funding for their rebate, along with providing consent to program access of their utility consumption and billing data. This consent will confirm an understanding from the customer that they are authorizing the following:

- Their energy utility(s) to provide details on their account, including the past 12 months of usage and 12 months of usage post-project completion.
- The utility account details provided can be shared with their selected contractor(s) and program partners, as needed.
- The utility account details can be shared with Focus on Energy to facilitate the application for applicable Focus on Energy rebates.

Energy consumption data may be collected by home auditors in the form of paper bills or access of utility bills through the utility's customer service portals. Many Wisconsin utilities provide customer account portals to access account information and directly download their utility data as an .xlsx or .csv file. Several IOUs and municipal electric utilities utilize the MyMeter platform to provide this service to customers. Customers will also have the opportunity to upload their energy consumption data as part of the application intake process to reserve funding for their rebate.

Wisconsin has a large number of energy utilities operating within the state and no law requiring utilities to provide energy data to third parties, therefore the State plans to accept the consumption and billing data in the format the utility and customer is able to provide it in. The data will be converted to HPXML for sharing and reporting purposes during completion of the energy assessment and subsequent modeling.

Energy consumption and billing data will be transferred to and maintained in the HOMES program implementer's system, which is stored within AWS S3 bucket with access limited to the site owner. Access to individual energy consumption data will be provided to assessors completing the energy modeling on the customer's home, program staff as needed for program implementation and/or customer assistance, the program evaluator for program evaluation activities, and Focus on Energy throughout completion of the project to assist in the application for applicable rebates. Access to the energy data will be provided to the following:

- The Assessor completing the energy modeling on the customer's home.
- Program staff as needed for program implementation and/or customer assistance.
- Program evaluator for program evaluation activities, including monitoring of the reliability of the models and tools.
- Focus on Energy upon the completion of the project to assist in the application for applicable rebates.

The transfer of data to the DOE is pending, dependent on the completion and functionality of an API currently in development. The decision on the protocol for data transmission to the DOE will be informed by the upcoming release of beta v3 of the API, which is being tested by Focus on Energy staff.

Data transfer would entail use of the provided API or DOE-provided reporting template.

Security and Safety of Energy Consumption Data

5. Describe how your state will ensure that any data are transferred and maintained safely and securely, using established standards. Describe:

- Encryption methods for data transfers.
- Protection of data collected and stored.
- Protocols in place for security guidelines and data classification.
- How the entity responsible for administering the program will notify a customer if there are data breaches or other security related events.

The State of Wisconsin will adhere to all policies and standards set by the Wisconsin Division of Enterprise Technology⁶ for information systems and environments used in the delivery of the HOMES program as documented in the Privacy and Security Risk Assessment blueprint.

In addition, Focus on Energy has a detailed Policy and existing procedures regarding data transfer and integrity that will be incorporated into the HOMES program manuals. New vendors, and contractors, must complete compliance training and execute the Compliance Certification before receiving access to HOMES data systems. Staff must be re-certified annually.

All involved data systems for the HOMES program have not been identified. The State of Wisconsin is planning to use Secure File Transfer Protocol (SFTP) and APIs to securely transfer data. Encryption methods will be provided upon finalization of all data tools and systems.

Wisconsin Statute 134.98⁸ details the data breach notification requirements for the State of Wisconsin. The Public Service Commission will be responsible for the coordination for reporting and communicating any confirmed data breaches to the public and/or DOE, as required. Individuals impacted by the data breach will be contacted via letter or email, notifying them of the data potentially comprised and what steps they can take to protect their information.

⁶ <https://det.wi.gov/Pages/policies.aspx>

⁷ [FOCUS-2024-Policy-Manual-Final.pdf \(focusonenergy.com\)](#)

⁸ <https://docs.legis.wisconsin.gov/statutes/statutes/134/98>

Consent, Notification, and Revocation Process

6. Confirm that all data will be collected from residents/owners with their consent.

Yes

No. Describe the state's alternative consent approach.

Data Details and Frequency

7. Indicate the timing of energy consumption data to be collected. If multiple options are selected, indicate those use cases:

Monthly _____

Annual _____

Other (specify) _____

8. Indicate the frequency for energy consumption data be collected by the program (i.e., when will data be available for the program).

At the time of home audit _____

12 months after program (likely for measured) _____

Other (specify) Customer can submit consumption data during application intake process when reserving funds.

Primary and Secondary Purpose

9. Please describe the primary purpose(s) of the energy consumption data.

- Implementation and reporting data for the program.
- Please describe any other primary purposes, if applicable (e.g., building benchmarking, emissions reductions etc.).

The primary purposes of the energy consumption data are implementation, data reporting, and evaluation of the program.

10. Describe any secondary purposes⁴ of the energy consumption data and the entities that it will be provided to (e.g., data will be provided to third parties to offer additional services like demand response initiatives, or other state-based programs).

The energy consumption data will be provided to Focus on Energy upon either the completion or cancellation of the project to assist the customer in

⁴ Secondary purposes may include the use of customer data in outreach and education and additional product offerings that the customer does not already receive or has not authorized. Examples of secondary purposes may include targeted advertising for other energy equipment and sharing data with a third party for a service not included in the State program.

the pursuit of applicable rebates and other energy saving opportunities for their home within the Focus on Energy program.

11. Identify if the program plans to Geographically Aggregate program data collected from residents/owners and provide it publicly.

No

Yes. Describe how data will be aggregated and anonymized and how it is intended to be published.

Eligibility, Oversight, and Enforcement of Third Parties

12. Describe the eligibility criteria for third parties to access energy consumption data (e.g., contractual agreement with the state or program implementer that requires data security and privacy).

The State will establish data security and privacy provisions to be included in contracts for all partnering entities that will have access to energy consumption and billing data.

Qualified contractors participating in the program will agree to the Participation Agreement, which will include data security and privacy provisions.

13. Confirm that the entities with access to energy consumption data will only use the data as approved for program purposes.

Yes

No. Describe the entities and purposes of their use of the data and how consent was obtained for these purposes.