Date Filed: September 28, 2026

Witness: Jared A. Lawrence
Request from: Office of Consumer Counsel

Question:
Refer to Exhibit CLP-AMI-2 at 49, "Green Button Connect".

a. Please provide the data requirements that will be shared with authorized third parties including the following:
   i. Data Types (e.g raw meter usage, billing quality meter usage, customer account information, customer bill etc.)
   ii. Data fields for each data type
   iii. Interval, update frequency and number of historical years of data for each data type
b. Please provide details on the following functional requirements that will inform the implementation of green button connect including the following:
   i. Registration and onboarding process
   ii. Authorization and authentication
      1. Regarding authorization and authentication, please indicate whether the Company intends to allow third parties to allow the bulk authorization and authentication of customers
   iii. Any Terms & Conditions that will be required for third parties to use the platform
c. Please describe what the Company means by "bulk data sharing", how this will be implemented and whether this will be separate or incorporated into the green button connect implementation.
d. Please describe any metrics the Company intends to report on for the performance of green button connect.
e. Does the Company intend to design the platform to be extensible to other types of energy data? If so, please describe how this will be implemented.
f. Please describe whether the Company intends to conduct stakeholder engagement to inform the Green Button Connect implementation. If so, please describe how this will be implemented.

Response:

(a) The data requirements that will be shared with authorized third parties include the following:

1. The Company anticipates making the following categories of data available to authorized third parties through its Green Button Connect ("GBC") and associated data sharing platforms:

- Customer account and service information.
- Billing-quality usage data, including validated consumption and demand information.
- Interval usage data from Advanced Metering Infrastructure ("AMI") meters.
- Supplier and service relationship information.

The Company does not currently anticipate providing bill image PDFs through the platform. However, the underlying billing and usage data elements associated with customer bills may be made available.

2. The data fields anticipated to be available include, but are not limited to, the following:

- <u>Customer Account and Service Information</u>
  - Account number
  - Customer name
  - Customer email address
  - Customer phone number
  - Service address
  - Mailing address
  - Rate class/rate code
  - Meter number
  - Supplier identifier
  - Supplier name
  - Supplier type
  - Supplier effective date

- <u>Billing and Usage Information</u>
  - Billing period
  - Current and previous meter readings
  - Consumption for current period
  - Consumption for prior period
  - Commodity type
  - Bill amount
  - Customer charge
  - Delivery charge
  - System benefit charge
  - Applicable taxes and surcharges
  - Peak demand
  - Quality of reading indicators

- Interval Usage Information
  - Interval reading date and timestamp
  - Interval consumption value
  - Interval duration
  - Interval quality indicator
  - Time-of-use designation, where applicable

3. The Company anticipates providing validated, estimated, and edited ("VEE") billing-quality AMI data rather than raw meter data. Data will generally be available within approximately 24 to 48 hours after collection and validation.

   The Company currently anticipates the following:

   - Billing-quality usage data: updated within approximately 24-48 hours; up to twenty-four (24) months of historical data available.
   - Interval usage data: updated within approximately 24-48 hours following VEE processing; up to twenty-four (24) months of historical data available.
   - Bulk supplier data: provided on a recurring daily basis.

(b) The functional requirements that will inform the implementation of Green Button Connect, including the following:

1. Eversource anticipates a registration and onboarding process whereby third-party data recipients must:

   - Register through Eversource Energy's data sharing platform.
   - Provide company and user information.
   - Complete required certifications, attestations, and security reviews.
   - Execute applicable platform agreements and data protection requirements.
   - Receive Company approval prior to obtaining customer data access.

   For customer-authorized data sharing, approved third parties may submit authorization requests to customers through the platform. Customers may then authorize access using their existing utility account credentials through a single sign-on process.

2. For authorization and authentication, Eversource anticipates utilizing the Green Button Connect standard together with existing customer account authentication processes. Customers will authenticate using their utility credentials and will be able to grant, review, modify, and revoke authorizations through CL&P's customer-facing data sharing portal.

Third-party access will be limited to the scope, duration, and permissions established through the applicable customer authorization process.

For certain authorized market participants, such as competitive suppliers, Eversource anticipates supporting an opt-out data sharing framework, subject to regulatory approval. Under such a framework:

a) Customers associated with an authorized supplier may be automatically enrolled in data sharing.

b) Green Button authorizations may be established automatically based on the applicable customer relationship.

c) Customers would retain the ability to view, manage, and revoke such authorizations at any time through Eversource Energy's data sharing portal.

Accordingly, the anticipated framework would support authorization and authentication processes for groups of customers associated with approved entities, while preserving customer control through opt-out functionality.

1. Eversource anticipates requiring participating third parties to access customer usage data through its Green Button Connect platform to agree to the applicable terms, conditions, and cybersecurity requirements governing participation in the program.

   The specific requirements applicable to third parties are set forth in Eversource's:

   1. Cybersecurity Self-Attestation Requirements, available at: https://www.eversource.com/residential/account-billing/manage-bill/about-your-bill/share-usage-data/third-party-suppliers-terms/cybersecurity-self-attestation
   2. Third-Party Data Services Agreement, available at: https://www.eversource.com/residential/account-billing/manage-bill/about-your-bill/share-usage-data/third-party-suppliers-terms/third-party-data-services-agreement

   These documents set forth the requirements applicable to third parties, including, among other things, cybersecurity obligations, data protection requirements, confidentiality provisions, permitted uses of customer data, compliance obligations, audit and reporting requirements, and other conditions of participation. Third parties must satisfy the applicable requirements and agree to the governing terms and conditions prior to receiving customer data through the platform.

(c) Eversource uses the term "bulk data sharing" to refer to the provision of customer data to authorized entities, such as competitive suppliers for groups of customers rather than through individual customer-by-customer authorization workflows.

Eversource anticipates implementing bulk data sharing through a Green Button Connect-based platform that would:

a) Maintain approved third-party registrations.
b) Receive and process customer enrollment information.
c) Establish customer authorizations under an approved opt-out framework.
d) Deliver customer data files on a recurring basis.
e) Support API-enabled data exchange and retrieval.

Bulk data sharing is anticipated to be implemented as a component of the broader Green Button Connect data sharing framework.

(d) Eversource anticipates monitoring and reporting operational and performance information, including:

a) API transaction activity.
b) Data request volumes.
c) Request completion status.
d) Successful and failed transactions.
e) Error reporting and exception tracking.
f) User activity and transaction history.

(e) Yes. Eversource anticipates designing the platform using standardized Green Button Connect protocols and API-based architecture that can support future expansion and additional use cases.

Potential future applications may include:

a) Distributed Energy Resource ("DER") programs.
b) Demand response programs.
c) Energy benchmarking initiatives.
d) Load forecasting applications.
e) Additional authorized customer energy data services are approved through future regulatory proceedings.

The use of standards-based APIs is intended to facilitate future enhancements while allowing utility systems to remain the authoritative source of customer information.

(f) Yes. Eversource anticipates continuing stakeholder engagement throughout implementation of Green Button Connect and related data-sharing capabilities. This engagement may include collaboration with competitive suppliers, customer advocates, technology providers, PURA, and other interested stakeholders.

Eversource notes that the Green Button Connect standard was selected following stakeholder consultation, technical review, and regulatory guidance in other jurisdictions. Eversource expects stakeholder input to continue informing implementation activities, operational processes, performance expectations, and future enhancements to the platform.