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Aggregated Data Access: The 15/15 Rule in Illinois and Beyond

Tracking and benchmarking the energy use of buildings requires enhanced access to customer energy usage data. To protect customer privacy and ensure data security, many utilities access aggregated data that is compiled from a set of individual customer usage data.

Further, some states have enacted a privacy standard for utilities that helps ensure customer anonymity when energy data is released to third parties without customer consent. Often referred to as a "15/15 Rule," the privacy standard requires that aggregated data include a minimum of 15 customers with no one customer's load exceeding 15 percent of the group's energy consumption.

However, the rule varies from state to state. This fact sheet will help regulatory attorneys and others understand the definitions and differences.

The Origin of the 15/15 Rule in California and Colorado

The 15/15 Rule originates from a California Public Utilities Commission (CPUC) ruling in 1997 that applied to data access for Community Choice Aggregation programs. The California utilities later applied this rule to generic aggregated data access.

The CPUC is currently working with utilities to set specific standards, and does not condone applying the 15/15 Rule to energy use data that is to be used for benchmarking purposes[1].

In 2012, the CPUC adopted the 15/15 Rule for third-party data reporting. The Minnesota Public Utilities Commission is also considering the same rule, which has been proposed by Xcel Energy, an electric and natural gas service provider in both Colorado and Minnesota.

The 15/15 and 4/80 Rules in Illinois

In Illinois, the Illinois Commerce Commission (ICC) defines aggregated to mean compiling a set of individual customers' usage data, rather than summing up individual usage data[2]. Outside of Illinois, "aggregated" means that all energy use data are summed up for the entire group – making it very difficult to identify individual consumption behavior.

The 15/15 Rule defined by the ICC applies only to the access of anonymous, distinct energy use data. The ICC specified that the process of summing up energy use data was outside the scope of the proceeding, so the availability of that data for benchmarking purposes remains unchanged by this decision.

ComEd and other Illinois utilities continue to provide data using a 4/80 Rule, meaning that utilities can sum up energy data from a minimum of four customers as long as no one customer's load exceeds 80 percent of the group's energy consumption. This significantly improves data access over the original 15/15 Rule. It ensures privacy while removing the 15-tenant minimum, which prevents benchmarking the large percentage of multifamily buildings that have fewer than 15 tenants.

[1] Institute for Market Transformation. "Utilities Guide to Data Access for Building Benchmarking". March 1, 2013. p.14 http://research.cbei.psu.edu/media/files/IMT_Report_-_Utilities_Guide_-_March_2013.pdf

[2] See ICC Final Order, Docket No. 13-0506.