

Ms. Christine Long
OEB Registrar
Ontario Energy Board
P.O. Box 2319, 27th Floor
2300 Yonge Street
Toronto, ON M4P 1E4

October 26, 2021

**Re: EB-2021-0183 Green Button Implementation Consultation
Pollution Probe Comments**

Dear Ms. Long:

In accordance with the OEB letter dated October 12, 2021 below are Pollution Probe's comments related to the Draft OEB Staff Guidance and Proposed Amendments to the Retail Settlement Code (RSC).

Green Button is the data standard selected by the Ontario government for use in providing customers access to their energy usage and account information, as well as the ability to authorize the sharing of that data with third parties. Pollution Probe supports the adoption of Green Button for electricity and natural gas in Ontario. Green Button has been successfully adopted in other jurisdiction, but has struggled to make progress in Ontario over the past decade. To be successful, Green Button needs to be flexible, comprehensive and in alignment with end-user tools that meet energy consumer needs. Success will not occur on its own without dedicated support from the Province of Ontario and agencies including the OEB. IESO will also have a role to play, particularly in unlocking consumer opportunities that align with their Conservation and Demand Management (CDM) objectives.

Pollution Probe supports in principle the Draft OEB Staff Guidance and proposed changes to the RSC. Implementation of Green Button by distributors by November 2023 is only the start of the journey. The end outcome is how the platform is leveraged and empowers energy consumers. Hopefully the Green Button implementation task force and others supporting partners can provide value throughout the implementation of Green Button to ensure that it meets the intended outcomes. Industry partnerships and collaboration have helped ensure success in these kinds of initiatives, including a similar energy benchmarking for large building introduced through Ontario Regulation 20/17. When the Province does not take an open collaborative approach with consumers and industry, the likelihood of achieving the objectives is significantly diminished. By tracking outcomes in an objective and transparent manner, the Province and OEB will be able to gauge progress and take corrective action as needed in collaboration with distributors and industry partners.

This is a new concept for most distributors and it will be important for open communication and to put in place opportunities to partner and adopt best practices during implementation. This will also reduce the overall cost/risk for implementation since issues and challenges can be brought forward early and not duplicated across multiple distributors.

It is recommended that the customer authorization process be as easy and simply as possible. Providing an opt-in from a customer's online accounts would be simple, with an alternative process where a customer does not have an online account or there is another barrier. Opportunity for approval through consumers apps should also be considered as long as they provide sufficient validation of customer information. It will be the end user tools that consumers will receive value from and if they can use those tools/apps to manage the entire registration process, that would be the most seamless customer experience.

Respectfully submitted on behalf of Pollution Probe.



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