

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF
COLORADO**

IN THE MATTER OF THE PROPOSED
RULES RELATING TO SMART GRID DATA
PRIVACY FOR ELECTRIC UTILITIES, 4
CODE OF COLORADO REGULATIONS 723-3.

DOCKET NO. 10R-799E

**COMMENTS OF THE
DEMAND RESPONSE AND SMART GRID COALITION (DRSG)**

The Demand Response and Smart Grid Coalition (DRSG) is pleased to provide comments in the Notice of Proposed Rulemaking on Smart Grid Data Privacy. DRSG is the trade association for companies that provide products and services in the areas of demand response and smart grid. DRSG applauds the Commission for taking a step to address Smart Grid data privacy and disclosure and appreciates the opportunity to comment.

DRSG works to educate and provide information to policymakers, utilities, the media, the financial community and stakeholders on how demand response and smart grid technologies such as smart meters can help modernize our electricity system and provide customers with new information and options for managing their electricity use. DRSG's more than 50 members include numerous technology companies and leading providers of products and services for consumers and the business community.

I. Introductory Comments

DRSG believes that the United States is entering a new age of electricity—a so-called smart age, and DRSG urges the adoption of rules in Colorado that support movement toward this new era, while still recognizing that the electricity industry is in a period of transition.

DRSG believes that the introduction of smart grid technologies and products, and new practices such as demand response, will yield entirely new capabilities to those who manage the planning and operation of the electricity system and to consumers—large and small—who seek to manage their electricity consumption. The system will now have sensors and automatic control technologies that allow optimization of production, transmission and delivery of not only electricity but also services related to it. Customers will receive information that they have simply never had before, in most cases because the technology was not in place to produce it. That information will be used by customer-focused technologies to provide new opportunities to consumers to optimize their electricity usage according to a number of different parameters. The information will also be used by non-utility parties to provide a brand new range of products and services for consumers related to their electricity use.

This information-based age of electricity is still emerging, but it is not all in the future. It is already here and continues to unfold in real time. The early returns show that it is “a hit” with all electricity customers, who are used to making information-based decisions and who are accustomed to using information-based technology in the way they live their lives and run their businesses.

Key to making this electricity information age happen at a fast yet responsible pace is for policymakers to foster the development of policies and procedures which allow electricity customers easy and timely (including real-time) access to information about their electricity usage.

The Commission should adopt rules, policies and procedures that ensure customers are provided reasonable access to their detailed energy usage information in a manner that allows them to reduce energy use and manage their bills. Further, data access rules should enable the development of service offerings for customers that are based on both historical and real-time energy-usage information, as well as other parameters.

Any such rules, policies and procedures certainly must take into account data privacy and data access. However, DRSG believes that the rules proposed in Colorado to address these areas do not meet the test of accommodating the introduction of smart grid and do little to advance establishment of “innovative” consumer data uses or service offerings. The rules seems to be almost entirely designed for ad hoc, one-time requests for information and for the most part not designed at all for what might be considered “subscription” services, whereby a consumer or authorized third party would receive information on an ongoing basis.

II. General Comments on Data Privacy and Data Access

The Commission should recognize that, while smart grid technologies give rise to some new issues with regard to consumer privacy, there are existing privacy guidelines and consumer protection mechanisms in place today. The Commission should not begin with a default position that the development and deployment of the Smart Grid is introducing unique privacy issues. Rather, the Commission should begin its examination of privacy by considering existing consumer privacy concerns in other industry sectors and how they have or have not been addressed.

DRSG notes that no single data privacy standard fits all needs. As such, DRSG thinks the Commission should require a threshold of procedural safeguards, including meaningful disclosure and clear and simple opportunities to give or withhold consent. The goal is to enable customers to make meaningful choices about the use of their data. As long as these requisites are in place—information and choice—privacy interests are protected while leaving room for innovation and creativity. As part of its efforts to address privacy, the Commission needs to specifically articulate how security and authentication will be handled within the customer premises to safeguard data privacy.

DRSG believes that the customers and the utility each need rights of access to energy-usage data that are commensurate with their respective needs, such as billing in the case of the utility. The

Commission should establish rules that enable customers to both access their data and share it with authorized partners that will provide energy management or other service offerings. Rules governing this data access should establish fair market access for market participants.

III. Specific DRSG Comments on Specific Rules Proposed on Attachment A

COLORADO DEPARTMENT OF REGULATORY AGENCIES Public Utilities Commission

4 CODE OF COLORADO REGULATIONS (CCR) 723-3

PART 3 RULES REGULATING ELECTRIC UTILITIES

GENERAL PROVISIONS

3001. Definitions.

DRSG Comment: DRSG provides comment on several of the proposed definitions below. However, it also notes that there may be other new and additional definitions needed to allow the rules to accommodate smart grid technologies, products and services. Examples of these include “real time”, “near real-time”, “direct meter access”, and “direct meter access data.”

The following definitions apply throughout this Part 3, except where a specific rule or statute provides otherwise. In addition to the definitions stated here, the definitions found in the Public Utilities Law apply to these rules. In the event of a conflict between these definitions and a statutory definition, the statutory definition shall apply.

- (b) “Aggregated Data” (AD) means aggregated ~~energy usage~~ data that is sufficiently anonymous in its aggregated form so that any individual customer data or reasonable approximation thereof cannot be determined from the aggregated amount.

DRSG Comment: The rules should address “aggregate” and “anonymous” as separate elements. This rule as drafted mixes the two descriptions. Aggregation of customer data is not something that is only done by utilities. Aggregation of data is a key component of some of the new third party services provided by demand response providers.

- (i) “Customer Data” (CD) means customer-specific ~~energy usage~~ data ~~reflecting including~~ the energy units consumed, including kWh and kW, and other data ~~collected that may be produced by through~~ the customer’s meter such as VARs and power factor, and the resulting amount billed to a customer for utility related services. Additionally, information regarding the customer’s participation in regulated utility programs such as renewable energy, demand-side management, load management, and energy efficiency is also considered CD.

***DRSG Comment:** By using the phrase “collected through the customer’s meter”, this rule excludes information that is available directly from the meter (and may not be “collected” by the utility). Further, the term “resulting amount billed” could be interpreted to exclude information that does affect a customer’s bill (such as interval data), but would be useful to improve energy management. New information related to consumption will be created and collected by new devices and equipment in the home and business and it is necessary to consider that in the drafting of these provisions.*

- (ee) “Standard,” when used to describe CD, means data ~~that can reasonably be~~ maintained by a utility in the ordinary course of business, including at a minimum energy usage information sufficient to allow customers to understand their billed usage and analyze energy usage patterns at level of detail commensurate with the meter or network technology deployed by the utility at the customer’s premise. When used to describe an AD report, it means those reports that are created using Standard CD.

***DRSG Comment:** Data maintained by a utility in the “ordinary course of business” seems vague and gives all discretion to the utility to define “ordinary.” In keeping with earlier observations, this rule does not anticipate what will be “ordinary” in the very near future as a result of smart grid technology being in place. This rule should be expanded to include information that advances cost-effective energy management and consumer empowerment tools.*

3011 Disclosure of Customer Data.

***DRSG Comment:** DRSG believes that customers should be able to access electricity data directly from the meter that is measured and created by a meter in real- or near real-time. The introduction of smart meters will introduce new capabilities to provide new data that needs to be accessible directly from the meter to the customers, and any designated third party, without having to be backhauled through the utility data management system. Among the reasons for*

allowing such timely access is to allow customers and their third party representative to participate in various markets and provide new products and services.

DRSG believes that the following section is drafted from the “business as usual” standpoint of a utility. As noted throughout these comments, the introduction of smart grid technologies and practices means that there are new opportunities to create data and use that data for energy management by the customer. Thus timeliness of data creation, data access and mode of access becomes critical. DRSG does not believe that the section as written sufficiently accommodates these new data parameters.

- (a) A utility in the ordinary course of business is authorized to collect and use CD for regulated utility operations.
- (b) A utility shall not disclose CD unless such disclosure conforms to these rules.
- (c) A utility shall include in its tariffs a description of standard and non-standard CD that the utility is able to provide to the customer or to any third-party recipient to whom the customer has authorized disclosure of the customer’s data. A minimum, the utility’s tariff will provide the following:

DRSG Comment: this provision does little to establish what the minimum thresholds should be for what is considered “standard.” As drafted, it is information deemed “standard” by the utility, but ~~is not~~does not seem to be informed at all by what the consumer would reasonably consider standard.

- I. A list of standard and non-standard CD available from the utility, including:
 - a. A description of standard CD (billing determinants or other collected data) and frequency of data collected (annual, monthly, twenty-four hours, etc.);
 - b. A description of non-standard CD and an explanation of why it is considered non-standard. This shall include an explanation as to the technical feasibility or infeasibility of making such non-standard CD available to the customer.
 - a.—
 - b-c. The method of transmittal access available (electronic, paper, etc.), ~~and~~ the security protections or requirements for such transmittal, and instructions for how to initiate access;

~~e.d.~~ A timeframe for processing the request; and

~~e.e.~~ Any rate associated with processing the request.

DRSG Comment: *DRSG believes that as written above, the provision of real time data to customers and authorized third parties in near real time would not be accommodated. It may also provide too much latitude in the establishment of fees.*

- II. A request form for submitting a data request for CD or AD reports to the utility identifying any information necessary from the requestor and/or customer for the utility to process such a request.

DRSG Comment: *This provision seems to be written as if the requests will be ad hoc and infrequent. Instead, it is necessary to address a continual, systematic provision of customer data to customers and authorized third parties. This must of course include a process for periodic review and approval of continuation.*

- III. A Consent to Disclose Customer Data form conforming to the requirements contained in Rule 3013.

DRSG Comment: *See above*

- IV. A statement that if the utility that complies with the CD rules, it shall not be responsible for any damages resulting from the disclosure of CD, including any loss of profits or other consequential damages.

- (d) A utility shall provide to a customer and to any third-party recipient to whom the customer has authorized disclosure of the customer's CD, access to the customer's CD in electronic machine-readable form, in conformity with nationally recognized open standards ~~and best practices~~ issued by nationally recognized standards-setting bodies, in a manner that ensures adequate protections for the utility's system security and the continued privacy of their CD during transmission. The utility's obligation to provide a customer's CD is limited to standard CD and by its current technological and data delivery capabilities.

***DRSG Comment:** The last sentence of this provision is drafted as if “standard data” and “currentcapabilities” will be more static than will be the case. Data creation and provision is now on a technological continuum that will need to be accommodated by any rules that apply to data and data access.*

Each electric consumer in the United States should have the right to access (and to authorize 1 or more third parties to access), from such consumer’s retail electric utility, the retail electric energy information of such electric consumer in electronic machine-readable form, in conformity with applicable nationally recognized open standards, developed by a nationally recognized Standards Organization, free of charge, and in a manner that is timely and that provides adequate protections for the security of such information and the privacy of such electric consumer.

- (e) Notwithstanding paragraph (b) of this rule, a utility may disclose CD as required by law, which includes in response to requests of the Commission, warrants, subpoenas, court orders, requests from the emergency service providers, or as authorized by § 16-15.5-102, C.R.S. The utility may also disclose CD to third-parties that assist the utility with its operations, so long as the utility meets the requirements of Rule 3014.
- (f) Nothing in this section shall be construed to limit a customer’s ability to access that customer’s own CD which is available through the meter
- (g) Need for liability limitation rule to be commented upon.

3012. Customer Notice.

- (a) A utility shall annually provide written notice to its customers and conspicuously post on its website notice of its privacy and security policies governing access to and disclosure of CD and AD to third-parties. This notice shall advise customers that their own CD will not be disclosed to third-parties, except: (1) as necessary to provide utility services to the customers, (2) as provided in Rule 3011(e), or (3) pursuant to the written or electronic authorization given by the customer consistent with these rules.
- (b) The notice shall also advise customers that their energy usage data can be used to obtain insight into their activities within the premises receiving service. The notice shall explain how the CD collected may reveal information about the way customers use energy at their premises. The notice shall advise the customer to consider the proposed scope, purpose, and use of CD prior to authorizing the disclosure of CD to third-parties.
- (c) The contents of the notice required by this rule shall:

- I. Include a description of the CD;
- II. State the frequency of obtaining the CD;
- III. Inform customers that the privacy and security of their CD will be protected by the utility while in its possession;
- IV. State that customers can access their standard CD, as identified by the utility's tariff, free of charge;
- V. State that, with the exception of the data disclosures provided in Rule 3011(e), customers have an expectation of privacy for their CD.
- VI. Outline the utility's policies regarding how customers can authorize access and disclosure of their CD to third-parties not falling within the exceptions outlined in Rule 3011(e). With regard to such third party data disclosure, the notice shall:
 - a. Inform customers that declining a request to consent to the disclosure of their own CD to a third-party will not affect the provision of utility service which the customer receives from the utility;
 - b. State that any customer consent for access to, disclosure of, or use of their own CD by a third-party may be revoked or limited by the customer of record at any time and inform them of the process for doing so;
- VII. Inform customers that CD may be used to create AD, and that the utility may provide AD to third-parties, subject to its obligation under Rule 3016(b).
- VIII. Be viewable on-line ~~or~~ and printed in 12 point or larger font;
- IX. Be mailed either separately or included as an insert in a regular monthly bill conspicuously marked and stating clearly that important information on the utility's privacy practices is contained therein;
- X. Be printed in English and any specific language or languages other than English where the utility's service territory contains a population of at least thirty percent who speak a specific language other than English as their primary language as determined by the Commission using the latest U.S. Census information.
- XI. Provide a customer service phone number and web address where customers can direct additional questions or obtain additional information regarding their CD, the disclosure of CD or AD, or the utility's privacy policies and procedures with respect to CD or AD.

3013. Customer Consent Form for the Disclosure of their CD to Third-party Recipients.

***DRSG Comment:** DRSG believes that the following provision is simply inappropriate relative to the smart grid data access and provision capabilities that are or soon will be available to customers. As written, the provision requires each consent form to include detailed information about the incorporation status, names of officers and other corporate information. These are more onerous requirements than commonly accepted for data in other industries. Further, this provision is a static statement of data uses and it provides no reasonable mechanism for service providers to upgrade services without requiring a new, updated consent form. This is not practical for an innovation economy.*

DRSG believes customers should have the right to authorize a third party to have access to their consumption data. No third party should have access to a customer's consumption or billing information without that customer's authorization. There are third party services based on consumption data, particularly in the area of demand response, which will facilitate and/or enhance the energy-management actions undertaken by customers. This is one reason why it is important for customers to have the right to authorize third-party access to their data. Customers, furthermore, should be free to choose third-party services available from an open and transparent marketplace.

DRSG believes that third parties that provide essential services on a contractual basis to utilities should have access to customers' data, only if specifically authorized by the customer, with this authorization being subject to periodic review by the customer. These utility contractors should not be able to use customers' information for any other purposes than those that support their contractual relationship with the utility.

- (a) A utility shall make available on its website to any customer or third-party who requests it a Consent to Disclose Customer Data form ("Consent Form") with which the customer uses to authorize the disclosure of their own CD to a specified third-party recipient.
- (b) A utility shall provide and make available a paper and electronic version of a Consent Form for use to obtain consent to the disclosure of the customer's CD. The contents of the Consent Form must:
 - (I) Reference the customer's rights under Rule 3012(c)(V); and
 - (II) Provide spaces for the following information regarding the third-party recipient to be populated by that third-party recipient on the Consent Form:
 - (a) The name, including trade name if applicable, physical address, mailing address, and telephone number, and

- (b) A copy of the third-party recipient's assumed trade name or trade name registration, if applicable.
- (c) The name, mailing address, and telephone number of the third-party recipient's data custodian, and
- (d) The name and address of the third-party recipient's Colorado agent for service of process, and
- (e) A statement describing the third-party recipient's business structure (corporation, limited liability company, partnership, sole proprietorship, etc)
- (f) If the third-party recipient is a corporation: the name of the state in which it is incorporated; the location of its principal office, if any, in Colorado; ~~the names of its directors and officers;~~ and a ~~certified copy~~the registration number of its certificate of good standing authorizing it to do business in Colorado, ~~certified within 14 days prior to the submission of the Consent Form, and the date of such certificate.~~
- (g) ~~If the third party recipient is a limited liability company: the name of the state in which it is organized; the complete mailing address and physical address of its principal office; the name of its managers; and a certified copy of its certificate of good standing authorizing it to do business in Colorado, certified within 14 days prior to the submission of the Consent Form.~~The URL for the third-party recipient's website that displays additional information about the recipient.
- ~~(h) If the third party recipient is a partnership: the names, titles, and addresses of all general and limited partners; and a copy of the partnership agreement establishing the partnership and all subsequent amendments.~~

- (III) State the uses of the data for which the customer is allowing disclosure;
- (IV) State the purposes of the data collection;
- (V) State the date(s) of disclosure;
- (VI) State the description of the data disclosed;
- (VII) State the duration of time for which the consent is valid;
- (VIII) State any additional terms;
- (IX) Provide notice to the customer that the utility shall not be responsible for monitoring or taking any steps to ensure that the party to whom the data is disclosed is maintaining the confidentiality of the data or using the data as intended by the customer.

- (c) A third-party recipient may provide its own consent form so long as the contents of the consent form include the elements to be provided pursuant to subsection (b) of this rule and the consent form generally follows the format of the model Consent Form.
- (d) The use of an electronic signature is allowed as provided in § 24-71-101, C.R.S.
- (e) The Consent Form may be submitted through written or electronic methods. If a written copy is submitted then the Consent Form shall be signed by the customer of record ~~and notarized~~.

***DRSG Comment:** This provision requires notarization of any consent form. This is inappropriate and impractical and another example of how the rules being proposed do not accommodate smart grid technologies, services and capabilities. We are not aware of any other utility-consumer interaction (including establishing service) that requires a notarized document.*

- (f) A model Consent Form is found in rule 3017.

3014. Utility Related Third-Party Access to CD.

***DRSG Comment:** DRSG believes that customers, or third parties that they authorize to act on their behalf, should have access to all data that pertain to their energy usage. That information should include:*

- *Information generated by the meter used for measurement by the utility or other party for the purpose of billing the customer. Such information will include electricity usage by interval, but in some cases, particularly with C&I meters, may also include peak demand, voltage, frequency, amperage, power factor and power quality parameters.*
- *Information generated by other devices deployed by the utility to help control or manage the customer's energy usage in the business or premise.*
- *Information specific to the customer that is deposited in and/or created by a utility or third party in a customer's record.*

- (a) A utility may disclose CD to a third-party entity, including an affiliate, who has been contracted to assist the utility in the provision of regulated utility services or in the aggregation of CD, provided the utility has required, by contract, that the third-party entity shall:
 - I. Implement and maintain reasonable data security procedures and practices appropriate to the private nature of the information to protect the CD from unauthorized access, destruction, use, modification, or disclosure;

- II. These data security procedures and practices shall be equal to or greater than the data privacy and security policies and procedures used by the utility internally to protect CD;
 - III. Use CD solely for the purpose of the contract, and prohibit the use of CD for a secondary commercial purpose not related to the purpose of the contract without first obtaining the customer's consent as provided for in these rules;
 - IV. Execute a non-disclosure agreement with the utility.
- (b) The utility shall maintain records of the disclosure of CD to a utility related third-parties. Such records shall include all of the contracts with the third-party entities and the executed non-disclosure agreements.

3015. Non-Utility Related Third-Party Access to CD.

- (a) Except as outlined in Rules 3011(e), 3014(a) and 3016(f), a utility shall not disclose CD to any third-party unless the customer or a third-party acting on behalf of a customer submits a written or electronic signed Consent Form that has been executed by the customer of record.

- (b) ~~A request for the disclosure of a customer's CD shall not be combined with an inducement for such disclosure.~~

***DRSG Comment:** DRSG believes this provision to be arbitrary, vague and detrimental. As a practical matter, (and with no definition of "inducement"), this rule would eliminate the ability of any service provider to propose any offerings for the consumer that are common business practices (introductory offers, discounted equipment, discounts of any kind, etc.). This simply makes no sense for at least two reasons. First, smart grid products and services are new, and as with any new product and service area, businesses should be allowed to provide discounts and other business practices that encourage consumers to adopt the product or practice. Second, the Commission should encourage competition in the provision of new products and services that enable consumers to better manage their usage and costs. Eliminating the practices by which businesses compete for the consumer is contrary to this.*

- (c) In order to be valid, the Consent Form must be signed by the customer of record and the third-party must have included in the Consent Form all of the required information set forth in rule 3014. Incomplete Consent Forms shall ~~not~~ be rejected processed by the utility with an explanation as to the reason for such rejection provided in written or electronic form to the customer and third party within 5 business days from the date of submittal of the signed consent form.

DRSG Comment: *This provision is ambiguous with regard to what is “incomplete” and we find the prescriptive “shall not be processed” onerous. As a practical matter, we believe this could lead to indiscriminate rejection of requests.*

- (d) The utility shall maintain records of all of the disclosures of CD to third-party requestors. Such records shall include a copy of the customer’s signed Consent Form, all identifying documentation produced by the third-party requestor, the customer’s agreed upon terms of use, the date(s) of disclosure, and a description of the CD disclosed.
- (e) The utility shall maintain records of CD disclosures for a minimum of three years and shall make the records of the disclosure of a customer’s CD available for review by the customer within 5 business days of receipt a written or electronic request from the customer, or at such greater time as is mutually agreed between the utility and the customer.

3016 Requests for AD Reports

DRSG Comment: *We believe the rules should establish “aggregated data” as a standard offering from the utility that can be used for benchmarking purposes. Such benchmarking is a fundamental component of measuring individual performance as well as public policy effectiveness.*

- (a) A utility shall not disclose AD unless such disclosure conforms to these rules.
- (b) In aggregating CD to create an AD report, a utility must take steps to ensure the individual customer’s privacy. At a minimum, a particular aggregation must contain: (1) at least fifteen customers or premises, and (2) no single customer or premise’s energy usage may comprise 15 percent or more of the aggregated data amount (the “15/15 Rule”). Notwithstanding, the 15/15 Rule, the utility shall not be required to disclose AD if such disclosure would compromise the individual customer’s privacy or the security of the utility’s system.
- (c) If a single customer’s or premise’s load is 15 percent or more of the total data requested, the utility will notify the requestor that the AD, as requested, cannot be disclosed and identify with specificity the reason the request was denied. The requestor shall be given an opportunity to revise its AD request in order to address the identified concerns. An AD request may be revised by expanding the number of customers or premise accounts in the request, expanding the geographic area included in the request, combining different customer classes or rate category, or other applicable means of aggregating.

- (d) A utility shall include in its tariffs a description of standard and non-standard AD reports that the utility is able to provide to any requestor. A minimum, the utility's tariff shall provide the following:
- I. A list of standard and non-standard AD reports available from the utility, including:
 - a. A description of standard and non-standard AD reports available from the utility (billing determinants or other collected data);
 - b. The frequency of data collection (annual, monthly, twenty-four hours, etc.);
 - c. A description of the selection parameters available for compiling an AD report and how the utility will support third-party recipients in translating their requests into the available selection parameters;
 - d. The method of transmittal available (electronic, paper, etc.) and the security protections or requirements for such transmittal;
 - e. The charge for providing a standard AD report or the hourly charge for compiling a non-standard AD report; and
 - f. The timeframe for processing the request;
 - II. A request form for submitting a data request for AD reports to the utility identifying any information necessary from the requestor in order for the utility to process the request; and
 - III. Any limitations on liability for the utility related to the disclosure of AD to a requestor.
- (e) If a utility is unable to fulfill an AD report request because it does not have and/or does not elect to or cannot obtain all of the data the requestor wishes to include in the AD report, then the utility shall contract with a data aggregator, acceptable to both the requestor and the utility, to include the additional data, along with the CD in the utility's possession, prior to generating an AD report. The contract between the utility and the data aggregator selected by the requestor and the utility shall conform to rules 3014 and 3016(b) and shall not prohibit the data aggregator from combining data from multiple utilities. The utility shall be entitled to review the AD report prior to the report's release by the data aggregator to the requestor to ensure compliance with rules 3014 and 3016, so long as any non-publicly available information is redacted before the utility's review
- (f) A utility shall disclose CD to data aggregators selected by Colorado governmental entities who request AD reports for the purpose of promoting energy assistance, conservation, or environmental advocacy, or for public research so long as such data aggregator is acceptable to the utility and enters into a contract with the utility that conforms to rules 3014 and 3016(b).

- (g) A utility that complies with this section shall not be responsible for any damages resulting from the disclosure of an AD report, including any loss of profits or other consequential damages.

3017 Model Consent Form

- (a) Attached to these rules is the approved model Consent Form.

Conclusion

DRSG appreciates the opportunity to file comments.

Respectfully submitted this 24th day of March, 2011,

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