



December 1, 2022

Re: North Carolina Utilities Commission Docket NO. E-100 Sub 161

As a North Carolina chapter of the Association of Energy Engineers, a national organization whose mission is *"to promote the scientific and educational interests of those engaged in the energy industry and to foster action for Sustainable Development"*, the North Carolina Association of Energy Engineers (NCAEE) and our members are directly affected by the Proposal for Data Access Rules in this docket.

Access to accurate and complete energy billing and interval data is a critical first item in understanding our client's energy usage. The billing and interval data collected by our electric utilities provides critical information in understanding how we can help our clients both reduce energy usage and use it more effectively. There is a national standard for access to this information and our utilities, rather than creating their own interface, should build on **Green Button Connect**. Green Button Connect provides a standard interface, has multiple tools already built to access this data and has extensive security features already built in.

Further, until such time as Green Button Connect is implemented, both billing data and interval data should be made available in downloadable electronic form to all customers for all buildings. If errors or omissions are found in the electronic data, our utilities should work to address these errors and omissions in a timely and transparent fashion. The people of North Carolina have provided these utilities a monopoly, and in return these utilities should provide their customers and third parties with customer's permission access to complete and accurate billing and interval data at no additional cost.

Thank you,

A handwritten signature in blue ink that reads 'Phil Korest'.

Phil Korest, CEM  
President, North Carolina Association of Energy Engineers

**More information about the North Carolina Association of Energy Engineers:**

The **North Carolina Association of Energy Engineers** (NCAEE), is one of two North Carolina chapters of the Association of Energy Engineers (AEE). Based in Raleigh, NC, NCAEE serves energy engineers, facility managers and energy & sustainability managers from Greensboro, NC to the coast. Our national organization, AEE, is comprised of over 18,000 professionals in 97 countries and its widely recognized for its energy certification programs.

NCAEE has a board and several committees that run day-to-day operations and yearly goals, including scholarships, awards and outreach.