Better Buildings®
U.S. DEPARTMENT OF ENERGY

Energy Data Accelerator

Stakeholder Engagement Strategy Guide

U.S. DEPARTMENT OF ENERGY

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About the Energy Data Accelerator

The U.S. Department of Energy's Better Building Energy Data Accelerator (BBEDA) was a two-year partnership with cities and utilities to improve energy efficiency by making energy data more accessible to building owners. As a result of best practices developed by partners in this Accelerator, 18 utilities serving more than 2.6 million commercial customers nationwide will provide whole-building energy data access to building owners by 2017. This historic expansion of data accessibility will increase building energy benchmarking, the first step many building owners take to improve the energy efficiency of their buildings.

The *Stakeholder Engagement Strategy Guide* is part of the Energy Data Accelerator Toolkit, a collection of resources drawn from partners. By sharing how these partners overcame technical and policy barriers to whole-building energy data access, the Toolkit enables other communities to benefit from the work that has been done and foster the replication of these best practices throughout the country.

Introduction

The purpose of this guide is to help utilities and local governments design a productive stakeholder engagement process when developing approaches to improve energy data access. Based on the experience of Better Buildings Energy Data Accelerator (BBEDA) partners, it identifies the stakeholder groups that often participate in data access efforts, and describes the key interests and potential roles of each group. It also shares the experience of BBEDA partners in finding successful tactics and forums for effective stakeholder engagement.

Across the nation, building owners and operators are measuring and tracking the energy performance of their buildings more than ever before. Known as energy benchmarking, this process helps building owners manage energy consumption, identify opportunities to improve energy efficiency, and quantify financial outcomes. Benchmarking has also been shown to increase customer participation in utility energy efficiency programs. [1]

To conduct benchmarking, building owners need to know how much energy is used in the entire building. Yet, they are often prevented from accessing energy information for tenant-occupied spaces, where the tenant is the utility customer of record. Building owners frequently city this inability to gather data as a primary obstacle to benchmarking and improving the energy efficiency of their buildings.

Many BBEDA partner utilities are now offering, or are in the process of offering, solutions that provide building owners with information to conduct benchmarking while respecting customer confidentiality. State and local governments often worked closely with their utilities to engage a diverse set of stakeholders in shaping the technical and policy aspects of these data access solutions. Each stakeholder has specific interests, concerns, and needs related to data access that they would like to see addressed.

A stakeholder engagement process provides the opportunity for all of these issues to be understood and considered. Deployed effectively, a stakeholder engagement process will result in a data access solution that is appropriately designed for local needs, and that all parties view as satisfactory.

Drivers for Data Access

Salt Lake City, UT

In the case of Salt Lake City, several overlapping drivers helped to put data access on the City's radar. To start, the Utah Governor's Energy Efficiency and Conservation Plan had already recommended automating the flow of data from utilities to commercial customers to drive voluntary benchmarking and energy performance improvements in commercial buildings. At the same time, Salt Lake City was beginning its participation in the City Energy Project, an initiative working with 10 cities to develop customized energy efficiency programs and policies. Salt Lake City understood that the successful implementation of any benchmarking initiative would require streamlined access to energy consumption data, so they pursued data access early as a foundational issue.

Salt Lake City, Credit: Photo by Pond5, photo/44048763

[1] See pp. 2-3 of the Transmittal Letter from NMR Group, Inc. and Optimal Energy Inc. (2012). *Statewide Benchmarking Process Evaluation: Volume 1*: Report. Accessed February 2015: http://www.energydataweb.com/cpucFiles/pdaDocs/837/Benchmarking%20Report%20(Volume%201)%20w%20CPUC%20Letter%204-11-12.pdf.

Framing the Energy Data Access Discussion

The need for solutions that provide building owners with energy information about their buildings is rapidly increasing as benchmarking demand continues to grow in the buildings sector. Many building owners wish to benchmark their building portfolios as an energy management best practice, or to participate in voluntary energy efficiency programs run by real estate associations, governments, nonprofit organizations, and utilities. In some cases, state and local governments are now requiring benchmarking. Informational barriers that prevent benchmarking limit the ability of building owners, policymakers, utilities, and other parties from achieving their energy efficiency goals. The examples of Salt Lake City, UT and Washington, DC, illustrate some of the local factors that are driving benchmarking and the need for data access solutions.

Drivers for Data Access

Washington, DC

Washington, DC, which became one of the first cities to adopt a local benchmarking ordinance in 2008, began pursuing data access solutions shortly after passing its ordinance. During the initial stages of implementation, it became clear that certain building types – especially large multifamily and multi-tenant office buildings – would have substantial difficulties complying with the law without a whole-building data solution. The city convened a multi-year stakeholder engagement process that resulted in the local gas and electricity utilities' agreement to provide whole-building data access to facilitate benchmarking and compliance by all affected building owners. A requirement for utilities to provide data access was adopted in District legislation in 2014.

Washington, DC, Credit: Photo by Pond5, photo/31499620

Understanding Major Stakeholders

Once energy data access is recognized as a topic of importance by a utility, local government, or other influential party, an array of audiences is likely to voice a diverse set of interests, considerations, and/or concerns – some of which could be overlapping and/or competing. BBEDA partners found that involving multiple participants representing different viewpoints enhances the likelihood that the outcome of a stakeholder engagement process will be viewed as satisfactory by relevant parties. Partners have also found that the initial outreach and information gathering associated with identifying and recruiting stakeholders can help to build relationships, establish a sense of shared purpose, and signal the value of multiple perspectives. At the same time, attempting to be over-inclusive can also lead to delays. For this reason, a utility, local government, or other organization convening stakeholders will want to consider the relative benefits of an "invite-only" stakeholder process versus a process that is open to the wider public.

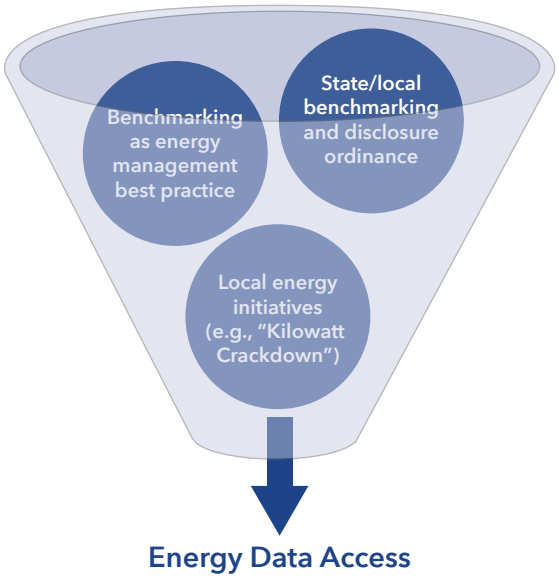

Figure 1: Energy Data Access Drivers

Although the specific mix of stakeholders varies by jurisdiction, BBEDA partners have found that the audiences most concerned with whole-building data access for benchmarking are likely to include:

Local government officials/policymakers

Who are they? Mayor's offices, city and county sustainability officials, regional planning commissions, city councils, etc.

What is their interest in data access? Support local energy efficiency policy and program objectives by ensuring that building owners have the information they need to conduct benchmarking.

What do they bring to the stakeholder engagement process? Help to clearly articulate and establish the policy context for benchmarking and data access, and to convene multiple stakeholder groups around the issue.

State officials/policymakers

Who are they? State energy offices.

What is their interest in data access? Accelerating statewide goals and programs related to energy efficiency, including by making ratepayer-funded energy efficiency programs more effective.

What do they bring to the stakeholder engagement process? Ability to work collectively with utilities, state utility regulators, local governments, and industry stakeholders to overcome obstacles to data access.

Commercial building owners/operators

Who are they? Property and facilities managers, real estate developers and investors, asset managers, and local chapters of trade associations such as the Building Owners and Managers Association (BOMA) International or the Institute of Real Estate Management (IREM).

What is their interest in data access? Develop a process that provides them with streamlined, whole-building data access to enable voluntary benchmarking and/or compliance with local benchmarking requirements.

What do they bring to the stakeholder engagement process? Help cities and utilities understand the challenges in obtaining whole-building data for multi-tenant properties, and articulate the need for a streamlined solution to data access that will facilitate the benchmarking process. Industry associations may also serve as conveners.

Local utilities

Who are they? Investor-owned and municipal utilities that provide energy services to buildings within a given jurisdiction. In most cases, the utility will be the architect/provider of a data access solution, and should include representatives from multiple divisions, including information technology,

Gather Information from Building Owners and Operators

In addition to articulating the need for data access within a specific city, commercial building owners and operators can also promote the replication of best practices across jurisdictions. Large owners/operators often control property portfolios in multiple cities, positioning them to help stakeholders understand the best practices and challenges of different data access solutions based on first-hand experiences. Many of these lessons are captured in the Better Buildings Energy Data Accelerator Toolkit.

demand-side management, customer service, and legal. The utility should also designate a point person to lead and coordinate the organization's participation in the stakeholder engagement process.

What is their interest in data access? Arrive at a cost-effective solution that provides building owners with information to conduct benchmarking while protecting the confidentiality of individual utility customers within buildings. Understand how data access can provide ancillary customer service and demand side management benefits.

What do they bring to the stakeholder engagement process? Help cities, building owners, and other stakeholders understand the legal and technical feasibility of a data access solution.

Utility regulators

Who are they? Public utility commissions (PUCs) and/or other regulatory bodies that provide oversight of utility companies.

What is their interest in data access? Ensure that any data access solution balances the interests of utilities, customers/ratepayers, and relevant stakeholders, as well as the costs and benefits incurred by each party.

What do they bring to the stakeholder engagement process? Their contributions depend on their role. PUCs may participate in stakeholder processes informally as observers, in which case their participation may add credibility and legitimacy to the data access issue. If a data access solution is proposed formally through PUC proceedings, regulators will convene and oversee the process, providing the final ruling on a utility's proposed data access solution and allowable cost recovery.

Consumer/ratepayer advocates

Who are they? Organizations that intervene in utility rate cases and other regulatory proceedings to protect the interests of consumers. These entities have different titles in different jurisdictions, such as Office of the People's Council, Office of Consumer Advocate, or Office of Consumer Council. The relevant national group is the National Association of State Utility Consumer Advocates (NASUCA).

What is their interest in data access? Ensure that any costs imposed upon utility ratepayers to fund a data access solution are both justified and fair, and that any utility program offering advances (or at least does not harm) consumer rights and interests (e.g., equity, access, privacy).

What do they bring to the stakeholder engagement process? Represent the broader ratepayer perspective beyond just commercial building owners and promote alignment between the customer classes that pay for the solution and those who benefit from the solution.

Leveraging EPA's ENERGY STAR® Program

Because EPA's ENERGY STAR Portfolio Manager® has become the industry-standard commercial benchmarking tool, cities pursuing data access solutions have found great value coordinating with EPA around stakeholder engagement efforts. EPA's ENERGY STAR team offers technical and programmatic support for cities and utilities pursuing streamlined approaches to providing data and facilitating benchmarking, including dedicated assistance with Portfolio Manager Web services, which allow for the automation of energy data transfer from utility systems to customers' building records in Portfolio Manager.

Regional/national energy efficiency groups

Who are they? Federal agencies (e.g, DOE, U.S. Environmental Protection Agency), non-governmental organizations (e.g., Institute for Market Transformation, ICLEI Local Governments for Sustainability, National Resources Defense Council, U.S. Green Building Council), and regional energy efficiency organizations (e.g., Midwest Energy Efficiency Alliance, Northeast Energy Efficiency Partnerships, Northwest Energy Efficiency Alliance, South-central Partnership for Energy Efficiency as a Resource, Southeast Energy Efficiency Alliance, Southwest Energy Efficiency Partnership).

What is their interest in data access? Contribute to the development and implementation of data access solutions to expand benchmarking and energy efficiency, and promote the sharing of data access best practices.

What do they bring to the stakeholder engagement process? Act as advisors to the utilities and cities, facilitate networking with stakeholders from other jurisdictions, and assist in obtaining the participation and buy-in of stakeholders.

Energy efficiency service providers/vendors

Who are they? Companies that provide energy efficiency products and services to the commercial building industry, including energy service companies, sustainability consulting firms, building system/automation vendors, engineering consulting firms, and organizations that provide energy metering and monitoring services.

What is their interest in data access? Overcoming market failures that constrain energy efficiency uptake, such as informational barriers and lack of awareness about energy efficiency opportunities. They may also be interested in expanding the utility energy efficiency marketplace by offering data access technical solutions and consulting services, and demand-side management expertise that leverages benchmarking.

What do they bring to the stakeholder engagement process? Help stakeholders understand how a streamlined, standardized process for data access can drive the local market for energy efficiency services.

Local colleges/universities

Who are they? Higher education institutions, including public and private colleges and utilities, community colleges, and trade/vocational schools.

What is their interest in data access? Support research and workforce development/training initiatives related to energy efficiency and benchmarking. In jurisdictions with benchmarking mandates, some local colleges and universities are providing benchmarking training support for building owners/operators. Academic researchers are also assisting some jurisdictions in the analysis of collected benchmarking data.

Identifying Stakeholders

Many strategies exist for identifying the "right" stakeholders for participation in data access discussions. Boston convened an advisory committee consisting of representatives from the major commercial building sectors/types that would be affected by its benchmarking mandate. In Salt Lake City, a non-profit organization, Utah Clean Energy, leveraged its role on utility demand-side management advisory groups and took the lead in identifying and recommending stakeholders based on interest, prior experience benchmarking, and profile/reputation.

What do they bring to the stakeholder engagement process? Help stakeholders quantify the downstream environmental and economic impacts of data access and benchmarking.

Key Issues Among Stakeholders

What are the key issues stakeholders wish to discuss related to data access solutions? Based on the experience of EDA partners, the following issues are commonly part of the conversation:

- **Understanding/establishing the case for benchmarking.** Across many jurisdictions, data access is framed within a broader conversation about benchmarking. Where benchmarking (voluntary or mandatory) has wide support from stakeholders, data access solutions are typically prioritized and supported as well. But in cases where stakeholders have less interest in benchmarking, the need for data access may be perceived as less valuable and important.
- **Commercial owner/operator need for whole-building data access.** Most leading building owners/operators understand that "you can't manage what you don't measure," and see this as a primary rationale for conducting benchmarking. However, it can be time-consuming or even impossible to access complete energy data in some buildings, especially where there are multiple tenants directly metered by the utility. In the absence of a streamlined solution for accessing whole-building energy data, property owners may not be able to take the important first step of measuring and tracking their energy performance—and this may lead to compliance issues in jurisdictions where benchmarking has been mandated.
- **Technical feasibility of system development.** Any wide-reaching, systematic approach to the issue of whole-building data access will likely require an IT solution. In the case of utilities, this can entail integration with existing customer information systems, raising questions of compatibility, data security/integrity, and ability to query legacy databases for new information. In addition to system constraints, utility IT departments are often overwhelmed with competing demands from multiple business units, and may have difficulty understanding and prioritizing energy data access as a critical task.
- **Cost of implementation/cost recovery.** Utilities developing data access solutions will incur costs associated with system build-out. Utilities must determine where the funding will come from (e.g., IT budget, DSM program budget, customer service budget, general fund), and if/how they will seek cost recovery from ratepayers, with approval of their PUC.
- **Customer data privacy.** When considering how to provide building owners with whole-building energy data for benchmarking, utilities must take into account the confidentiality of individual customers that lease space within a building. Regulations governing utility customer privacy can vary significantly between different states, and those regulations are sometimes interpreted differently even by utilities within the same state. Most utilities that offer whole-building data access solutions have developed minimum thresholds to protect customer privacy in cases where only a few tenants occupy a building.

Each of these issues will be prioritized differently depending upon the specific stakeholders involved in unique data access stakeholder efforts. Some issues will be more important to certain groups than to others, some groups may have multiple concerns, and some issues may be understood differently by different parties. By mapping out the network of stakeholders and their respective concerns, it is possible to anticipate the relative complexity of the stakeholder engagement process in a given jurisdiction, and to identify any potential "sticking points" at the outset. Table 1 below provides an indicative example of how typical issues might align with various stakeholder groups.

Table 1. Typical Data Access Issues Likely to be Raised by Various Stakeholder Groups

Stakeholder	Typical Issues
State/Local Government 	Ensuring compliance with benchmarking mandates (where applicable)
	Achieving energy efficiency policy goals, including transparency and performance improvement
Building Owner 	Obtaining access to energy usage data usage in order to successfully benchmark (regardless of voluntary or mandatory drivers)
Local Utility 	Technical feasibility and cost of building and delivering a data access solution
	Fulfilling obligations regarding customer data privacy
Utility Regulator 	Ensuring a balance between quality, reliability, and cost of utility service to customers
	Balancing legal requirements for data privacy against the need for data access
Consumer and Ratepayer Advocates 	Ensuring that any costs passed on to consumer are reasonable, justified, and fair
	Ensuring that customer data privacy is not diminished
Regional/National Energy Efficiency Groups 	Ensuring that the stakeholder engagement process and eventual system design is informed by best practices observed across the country, and consistent with broader market transformation goals
Energy Efficiency Service Providers/Vendors 	Providing insight regarding the role that data access can play in identifying and driving actual energy savings projects
	Identifying the secondary market and workforce impacts of enhanced access to energy data
Local Colleges/Universities 	Identifying value-added analyses that can be performed on large benchmarking data sets (enabled by data access)

Seattle's Informal Approach to Stakeholder Engagement

The development of a data access solution in Seattle, Washington, was facilitated by a pre-existing statewide benchmarking law (RCW 19.27A.170) that required large utilities to maintain customer billing data in a format suitable for upload into EPA's Portfolio Manager tool. Therefore, when the City of Seattle began developing its own benchmarking mandate, the local utilities were already primed to understand the importance of whole-building energy consumption data, and they quickly saw the value in providing a data access solution. As a result, an explicit stakeholder engagement process was not needed. While this allowed for the rapid implementation of data access solutions by local utilities, it also resulted in certain system design elements that impacted customer experience and usability, and that needed to be addressed in subsequent years. In fact, when Puget Sound Energy implemented upgrades to its data access approach in 2013, the development team made a point to engage local building owners to ensure that the design of its new system addressed specific customer and City of Seattle feedback that had been received regarding the prior version.

Seattle, Credit: Photo by Pond5, photo/24867423

Determining the Forum for Stakeholder Engagement

Creating a forum to organize complex stakeholder conversations is essential. Table 2 describes the range of options that EDA partners have used to convene stakeholders.

Table 2. A Range of Pathways for Stakeholder Engagement Around Data Access

Informal	Semiformal	Formal
Description		
▸ Limited number of stakeholders ▸ Meetings held as needed, rather than according to a published schedule ▸ Focus of discussion is not whether the utility will provide a data access solution, but how the solution will work	▸ Interested parties work together through various mechanisms without formal regulatory structure ▸ May entail large group meetings, as well as satellite working groups and/or informal discussions	▸ Stakeholder process takes the form of a regulatory proceeding, led by the Public Utility Commission (PUC) ▸ Proceeding entails formal notice and comment periods, public hearings/workshops, and maintenance of a docket to ensure transparency
When to Use		
▸ Local government and utility company have already agreed (e.g., via MOU) that whole-building data access will be provided or ▸ Utility is already required to provide a data access solution, per city or state law ▸ May be pursued in advance of a benchmarking ordinance or in order to facilitate a local energy initiative (e.g., Kilowatt Crackdown, Better Buildings, City Energy Project)	▸ May be needed when there is a large diversity of stakeholders and issues to be considered ▸ May be the best choice when whole-building data access is understood to be a shared goal, but the various parties need to be brought to same level of understanding	▸ May be required by law ▸ May be needed when stakeholders are expressing a number of competing concerns/ issues, and if the process is likely to become adversarial
Pros		
▸ Fewer stakeholders mean less coordination required ▸ This can translate to a quicker and less resource-intensive process in which decisions are more easily reached	▸ Process provides the opportunity to obtain buy-in from multiple stakeholders ▸ Allows for disagreements to be addressed and worked through, so that the ultimate solution is viewed as legitimate	▸ Fully documented, transparent process becomes part of public record ▸ Established process for proceedings

Informal	Semiformal	Formal
Cons		
▸ Eventual solution may not reflect the needs of all interested or affected parties	▸ Process requires time and coordination	▸ Highly structured process can last months or years
Examples		
▸ Seattle, WA ▸ Boston and Cambridge, MA	▸ Salt Lake City, UT ▸ Philadelphia, PA	▸ California ▸ Colorado ▸ Minnesota

Key Elements of the Engagement Process

Once a utility, local government, or other influential party begins the stakeholder engagement process, the bulk of the activity will involve conversations and working meetings between different stakeholder groups. The progression of meetings may range from large, informational, public meetings to smaller, tactical, working groups or targeted discussions. Most successful stakeholder engagement approaches used by BBEDA partners have incorporated one or more of the following elements:

Capable and Respected Convener

The convener serves as a "master of ceremonies," responsible for recognizing and communicating the importance of data access, identifying and bringing together interested parties, helping to articulate key issues across participating groups and define a working agenda, coordinating logistics, and maintaining group momentum over time. The following is a list of characteristics, roles, and responsibilities typically associated with a convener:

- Does not necessarily have to be an independent third party or a professional facilitator, but should hold a credible reputation among stakeholders.
- Demonstrates a willingness and ability to invite multiple points of view.
- Commits to seeing the process through from beginning to end.
- Takes responsibility for tracking where various issues and discussions stand, where solutions/agreements have been reached, and which issues still remain unresolved.
- Ensures that all stakeholders are kept apprised of next steps, action items, and timelines.

Diversity of Meeting Formats

Large-group, in-person meetings can be extremely useful in the stakeholder engagement process, but it is important to recognize that other formats may also be effective. The use of smaller, less formal working group sessions may be valuable for working through finer details, or providing a venue for a limited number of parties to address a concern that does not

Convener Examples

- Mayors' offices, which can initiate discussions among participants (this may take place within a broader context of municipal energy efficiency/sustainability planning.)
- A local nonprofit or research organization, which is pursuing market solutions for building energy efficiency.
- Local chapters of real estate trade organizations, such as the Building Owners and Managers Association (BOMA) or Institute of Real Estate Management (IREM), who can draw upon their members.

Driver for Data Access: Philadelphia

Recognizing that data access plays an important role in driving energy savings, Philadelphia asked the Consortium for Building Energy Innovation (CBEI, formerly EEBHub) to serve as a convener and a technical advisor for its data access stakeholder engagement process. In 2012, CBEI organized a series of meetings that included key stakeholders such as the mayor of Philadelphia, CEOs of leading real estate companies, utilities, DOE, and EPA. The working group met three times to identify regional needs and to learn from other utilities and jurisdictions to craft a solution applicable to Philadelphia. As a result, local utility PECO agreed to provide automated upload of commercial building energy data to Portfolio Manager, and to use the Green Button format as another means of making data more readily available.

impact all stakeholder groups. In designing a meeting schedule, consider the following:

Large, full-group in-person meetings

- May serve as important milestones in the process to impose deadlines and maintain forward momentum.
- Can be more productive and relevant for attendees if broken up by topic issues (e.g., privacy, cost, technical issues).
- Create opportunities to host guest speakers from other jurisdictions and organizations that can speak to various successful or unsuccessful approaches.

Separate, specific working group meetings

- Helpful for working through finer details that might otherwise delay or derail a larger group meeting.
- Can be tasked with presenting their findings at the larger public meetings.

Memoranda of Understanding (MOU)

In some cases, a city may wish to coordinate with its local utility (or utilities) on data access prior to launching a broader stakeholder engagement initiative. For example, the city and utility may execute a memorandum of understanding (or similar agreement) stating that the utility commits to providing commercial building customers with access to aggregated whole-building data. With these assurances, the city can proceed with the development and implementation of its benchmarking policy initiatives (whether mandatory or voluntary) with the knowledge that affected building owners will have the information needed to participate/comply. With this kind of agreement in place, the nature of the stakeholder engagement around data access can focus on specifics (e.g., aggregation thresholds), as opposed to whether data access should be provided in the first place.

Expressions of Support from Industry

A "letter of support" from a local real estate association to local utilities (and/or the group of stakeholders as a whole) can help articulate the need for streamlined access to whole-building energy data, and help to express the real value that data access provides to building owners and operators. Often, utilities are not aware of the barrier that data access presents to their commercial building customers. A letter of support can be a critical step in establishing a shared sense of urgency and purpose. Furthermore, a letter from a group of large customers positions the issue of data access in the context of customer satisfaction, as opposed to simply a question of information technology. This approach was used as part of the Salt Lake City stakeholder engagement process, where the leadership of BOMA-Utah drafted and sent a letter to its local utilities, Rocky Mountain Power and Questar Gas.

Continue Stakeholder Engagement Through Implementation of Data Access Solution

Once a utility has decided to implement a data access solution, the stakeholder engagement process is not over. Although the actual development of a solution may be carried out by a utility's IT team (or contracted vendor), it is still critical to keep stakeholders apprised of the process, including timeline, milestones reached, expected date of implementation, and any unforeseen changes

Using MOUs to Drive Data Access

The City of Boston discussed whole-building energy data access with its local utilities, National Grid, Eversource, and Veolia, when developing its benchmarking ordinance. This helped facilitate passage of the ordinance and subsequent development of the implementing regulations, because affected building owners knew that they would be able to access to the data needed for compliance. This pre-existing agreement also helped lighten the load for neighboring city Cambridge, when it sought to enact a similar benchmarking ordinance. In both cases, the cities and utilities viewed themselves as partners with a common goal – empowering building owners to comply with the ordinances and better understand energy consumption in their buildings.

Leveraging Stakeholders as Data Access Solution Testers

In Washington, DC, three organizations – Tower Companies, DTZ, and Vornado – were instrumental in beta-testing the Pepco data access tool before its launch to the broader market.

to schedule (especially if these changes impact benchmarking compliance deadlines).

Furthermore, to the extent that the utility is able to engage in "usability testing" of their solution, the stakeholder group can provide end users able to provide meaningful feedback, and can help the utility ensure that the data access solution is fully functional when it is launched to the local market.


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