

SEC INTERROGATORY #70

INTERROGATORY

[B/6/1, p. 10] Please discuss the extent to which it is appropriate for an EM&V contractor to withhold from utilities specific information from NTG surveys that could be used to identify individual customers. Please include discussion of the appropriate application of this issue in the context of custom C&I NTG studies.

RESPONSE

Confidentiality is important and, if promised as part of the survey framework, it would be inappropriate to share sensitive information that could be used to identify individual customers. However, it is also important to provide transparency in how different responses drive the NTG estimates. In the experience of the Navigant team, it has always been possible to provide information in a manner that provides adequate transparency while also protecting individual customers.

Multiple (i.e., 3) interviewees stated that confidentiality of customer responses is important and evaluators often cannot or do not share individual responses. Although provision of individual responses was only reported in the Illinois case study (p. 25), in that instance identifying information was redacted. There are other ways to provide transparency into responses and calculations without divulging confidential information. As described on page 10 of the report, one interviewee stated:

cross-tabulations or frequencies can be used to understand how responses to certain questions drive the NTG values and conduct sensitivity analyses (e.g., looking at impacts of specific questions on the scoring algorithm). This approach protects confidentiality while providing information necessary to understand what questions and responses affect the final NTG estimates.

Another interviewee noted (p. 19) that in California, CPUC staff and consultants will hold a meeting with utility representatives to provide transparency on methods and calculations without providing confidential information.

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