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SMUD Comments Re 25-OIR-02

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Additional submitted attachment is included below.



February 25, 2026

Docket Office
California Energy Commission
715 P Street
Sacramento, CA 95814

RE: Sacramento Municipal Utility District’s Comments on Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection Rulemaking

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the California Energy Commission’s (CEC)’s “Energy Data Collection – Phase 3 for Natural Gas and Renewable Natural Gas Data Collection” rulemaking. SMUD is a local publicly owned electric utility serving approximately 673,000 customer meters, or a population of about 1.5 million, in Sacramento County and small adjoining portions of Yolo and Placer Counties. SMUD has established an ambitious goal of removing all greenhouse gas (GHG) emissions in its power supply by 2030, working within the guardrails of ensuring reliable and affordable electric service.

As a local publicly owned electric utility that does not provide gas service to customers, SMUD had not anticipated filing comments on a natural gas and renewable natural gas data collection rulemaking. However, SMUD recently learned that the proposed amendments include revisions to electricity demand and billing data reporting for utilities with an annual peak demand exceeding 1,000 MW.¹ Because SMUD has an annual peak demand exceeding 1,000 MW, SMUD would be directly affected by these changes.

SMUD therefore offers the CEC the following feedback and respectfully requests the CEC consider all of its comments before finalizing the proposed regulations.

CEC should clarify proposed additions to electricity demand and billing data reporting

The CEC’s proposed amendments to section 1353 include multiple revisions that will change SMUD’s existing reporting and that will require new development, technical

¹ The proposed 45-day amendments ([Express Terms Gas Data Rulemaking](#)), proposed 15-day amendments ([Notice of Additional Comment Period](#)), and other rulemaking documents are available in [25-OIR-02](#).

resources, coordination with CEC staff, and quality control testing for SMUD to implement. These changes include:

- Increased reporting frequency (sections 1353 (a)(1) and (b)).²
- Addition of meter-level latitude and longitude data (section 1353 (b)(1)(A)).
- Addition of customer identification numbers (section 1353 (b)(1)(F)) and customer groups (section 1353 (b)(1)(G)(v)).
- Addition of baseline territory for service accounts being billed (section 1353 (b)(G)(ii)).
- Addition of MIDAS rate identification numbers (RINs) (section 1353 (b)(1)(G)(iii)).

Some of these changes may seem straightforward. However, the reporting structure for electricity demand data is complex. Information technology (IT) teams must build programs that query and group specific data elements across multiple, vast, complex systems without interfering with the performance of these systems. Unclear definitions and requirements risk misalignment between reporting utilities and the CEC, which can and does result in delayed reporting and significant costs. It is therefore critical to have a clear and precise understanding of each new data element *and* how it relates to all existing data elements.

Accordingly, SMUD requests clarification regarding several proposed additions to reporting, including, “customer identification number,” “customer group,” and “baseline territory.” These terms are currently undefined in the proposed amendments and may be interpreted differently by the CEC and utilities. SMUD additionally requests that the CEC clearly describe or illustrate the required data relationships for all reporting additions.

CEC should further clarify the expected costs and benefits of the changes to electricity demand and billing data reporting

Changes to the electricity demand and billing data reporting requirements in section 1353 are not simple or straightforward to implement. At SMUD, each change—even to the reporting cadence—requires IT development and testing resources. SMUD therefore recommends the CEC revisit the Fiscal Impact Statement in the Initial Statement of Reasons (ISOR), which indicates that local governments will not be impacted by the proposed amendments.

For example, for SMUD—a publicly owned electric utility—the addition of meter latitude and longitude data will require integration with SMUD’s GIS system, which is currently not used in section 1353 reporting processes at all. This will be a technically complex and potentially costly exercise. Moreover, it is currently unclear to SMUD whether the additional precision of meter-level latitude and longitude

² The [Initial Statement of Reasons](#) (ISOR) notes at p. 16 that the utilities have begun reporting on a monthly basis for business purposes. However, SMUD’s reporting is currently configured to support quarterly submissions, as required by the existing regulations.

data—which, in SMUD’s case, generally reflect the center of the parcel where the meter is located, *not* the physical coordinates of the meter—will meaningfully improve the accuracy of the CEC’s comparative data analyses relative to using the address of the meter.³

SMUD therefore requests the CEC provide additional details in the ISOR regarding the need for, and expected benefits of, each specific reporting change. The CEC should expand on the locational data problems it is seeking to address and the expected benefits of incorporating granular coordinates associated with the meter parcel. In addition, the ISOR does not appear to address the purpose or benefits of adding “customer group,” “baseline territory,” and MIDAS RINs to the reporting requirements for electricity demand and billing data. SMUD requests the CEC describe the need for and benefits of these additions.

The CEC should carefully weigh the costs and benefits of the proposed changes

SMUD urges the CEC to weigh the resource burden of building these new reports—which are ultimately costs borne by utility customers—against the value of these more exhaustive data reporting requirements. SMUD’s IT resources are planned and budgeted on a two-year cycle, and SMUD has limited ability to absorb unanticipated development and testing work. Moreover, SMUD is currently engaged in a multi-year process to migrate its enterprise-wide SAP platform, which has been in use for over two decades and—importantly—for which SAP will be phasing out support. This process will significantly ramp up in the coming year, and it will be an extraordinary effort and a critical, high-priority need for SMUD and its customers on the path to achieving SMUD’s 2030 Zero Carbon Plan goals. As such, SMUD IT resources are focused on supporting this project. The proposed amendments to electricity demand reporting requirements could divert SMUD resources from this essential, time-sensitive work.

If the expected benefits of any proposed change do not clearly justify the costs for utilities and their customers, SMUD respectfully requests that the CEC remove it before finalizing the proposed amendments. At a minimum, the CEC should defer the effective date of any approved changes to enable successful implementation, allow time for coordination between CEC staff and utilities, and mitigate impacts on affected utilities.

Conclusion

SMUD requests that the Commission clarify proposed changes to electricity demand reporting requirements and carefully weigh anticipated costs and benefits. If the Commission approves proposed changes, SMUD strongly recommends delaying the effective date of the changes to allow utilities to devote resources to building and

³ ISOR at p. 17.

updating the IT infrastructure needed to support these reports and ensure sufficient time for utility and CEC staff coordination.

/s/

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cc: Corporate Files (LEG 2026-0026)