

DOCKETED

Docket Number:	15-IEPR-05
Project Title:	Energy Efficiency
TN #:	204688
Document Title:	Lourdes Jimenez-Price Comments: SMUD Comments on Existing Buildings Energy Efficiency; Benchmarking and Local Government Challenge
Description:	N/A
Filer:	System
Organization:	SMUD/Lourdes Jimenez-Price
Submitter Role:	Public Agency
Submission Date:	5/21/2015 3:09:00 PM
Docketed Date:	5/21/2015

Comment Received From: Lourdes Jimenez-Price

Submitted On: 5/21/2015

Docket Number: 15-IEPR-05

SMUD Comments on Existing Buildings Energy Efficiency; Benchmarking and Local Government Challenge

Additional submitted attachment is included below.

**STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION**

In the matter of:)	Docket No. 15-IEPR-05
)	
<i>2015 Integrated Energy Policy Report</i>)	SMUD Comments On: <i>Existing</i>
)	<i>Buildings Energy Efficiency;</i>
)	<i>Benchmarking and Local</i>
)	<i>Government Challenge</i>
)	
)	May 21, 2015

**Comments of the Sacramento Municipal Utility District:
Benchmarking and Local Government Challenge**

Thank you for the opportunity to provide comments on the topics of the proposed expansion of benchmarking and local government leadership in the draft *Existing Buildings Energy Efficiency Action Plan* (EBEE Action Plan). The Sacramento Municipal Utility District (SMUD) has very brief comments at this time, in response to the May 7th workshop that covered these two strategy areas in the EBEE Action Plan.

A. Expansion of Benchmarking Beyond That Required By AB 1103

SMUD would like to respond to Chair Weisenmiller's request for comments about whether there were any information technology (IT) barriers, impacts, or issues with the proposed expansion of benchmarking from only large buildings that are being sold or newly leased to all commercial buildings above 50,000 square feet by a time certain. SMUD understands that this proposal is estimated to involve moving from annually providing energy data for 3% of the floorspace in California (the amount changing hands each year) to 50% of the floorspace, by 2018.

SMUD has developed an automated, electronic structure for providing energy data under the AB 1103 regulations. This structure is scalable in SMUD's view, so that the expansion to providing energy data for 50% of the floorspace will not amount to a significant impact on the IT requirements for SMUD. SMUD does not see the IT requirements of the expansion as a barrier to the proposal.

SMUD was pleased to hear at the May 7th workshop that the California Energy Commission (CEC) considers customer privacy in a different light than under the existing AB 1103 structure. SMUD agrees that there is a significant difference between private disclosure of energy data as part of a building changing hands or being newly leased and the potential public disclosure of a building's energy rating. SMUD cares deeply about our customers' privacy and will work with the CEC as the proposal unfolds to ensure that privacy is maintained.

B. Local Government Leadership and the Local Government Challenge

SMUD works closely with the local governments in our service area, but unlike many other municipal utilities, SMUD is not directly associated with any city or county government. We partner with the cities, other local jurisdictions, and the County of Sacramento on a variety of energy-related issues, including energy infrastructure needs and updates, local climate and sustainability plans, energy efficiency measures and programs, and economic development.

SMUD supports the EBEE Action Plan strategy of engaging local governments as leaders in advancing energy efficiency in existing buildings and supports the concept of a “Local Government Challenge” competition by the CEC to fund and promote significant energy efficiency improvements in the winning jurisdictions. SMUD stands ready to be a strong partner with our local communities in the competition.

Thank you again for the opportunity to comment.

/s/

LOURDES JIMENEZ-PRICE
Senior Attorney
Sacramento Municipal Utility District
P.O. Box 15830, MS B406
Sacramento, CA 95852-0830

/s/

TIMOTHY TUTT
Government Affairs Representative
Sacramento Municipal Utility District
P.O. Box 15830, MS B404
Sacramento, CA 95852-0830

cc: Corporate Files (LEG 2015-0419)