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Docket Number:	15-IEPR-05
Project Title:	Energy Efficiency
TN #:	205353
Document Title:	Steve Schmidt Comments: Leverage Smart Meter data to address the Plug Load epidemic
Description:	N/A
Filer:	System
Organization:	Steve Schmidt
Submitter Role:	Public
Submission Date:	7/14/2015 6:04:05 PM
Docketed Date:	7/15/2015

Comment Received From: Steve Schmidt

Submitted On: 7/14/2015

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Leverage Smart Meter data to address the Plug Load epidemic

HEA was unable to attend the workshop in person but attended via the web.

Our comment is that smart meter data can and should be leveraged to identify buildings with high active and inactive plug loads.

Specifically:

1. We concur with Chris Calwell and Pierre Delforge that the "long tail" of plug load devices precludes the traditional device-based approach. It is this long tail that is causing explosive growth in this category despite the California's progress on many individual device categories.
2. We concur with Alan Meier that California should limit builder-installed plug loads as part of Title 20/24 and should leverage smart meter data prior to building occupancy to identify conformance.
3. Thanks to California's investment in smart meters, the technology exists to analyze and mitigate plug loads at scale, quickly, at very low cost.

Thank you for the opportunity to comment.