

## DOCKETED

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December 11, 2015

Andrew McAllister  
Commissioner  
California Energy Commission  
1516 Ninth Street, MS-34  
Sacramento, CA 95814

Dear Mr. McAllister,

The California State University (CSU) has reviewed the documents from the November 12, 2015 scoping workshop regarding the Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802. CSU provides the following comments on the upcoming regulations.

CSU supports the intent of AB 802 to increase building owner's access to building energy use information, however, as presented, the upcoming changes will fail to consider the unique situation faced by campuses. Most of our universities have a single meter account, which serves multiple interconnected buildings in addition to multiple other accounts of varying configuration. Furthermore, many of our campuses have on-site generation installed on the campus-side of the meter. In any case, the presented 1-to-1 meter to building ratio is not accurate and reporting will be very complicated.

The CSU recommends the regulatory language should accommodate a campus environment in one of the following ways:

- Develop a new campus level category for reporting and benchmarking.
- Exempt CSU from reporting. The CSU Board of Trustees has set ambitious energy efficiency goals that align our operations with state-level goals. All campuses in Investor Owned-Utility (IOU) territories also participate in utility energy efficiency partnerships. Additionally, CSU requires each of the campuses to report its campus level energy consumption on a monthly

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**CSU Campuses**  
Bakersfield  
Channel Islands  
Chico  
Dominguez Hills  
East Bay

Fresno  
Fullerton  
Humboldt  
Long Beach  
Los Angeles  
Maritime Academy

Monterey Bay  
Northridge  
Pomona  
Sacramento  
San Bernardino  
San Diego

San Francisco  
San José  
San Luis Obispo  
San Marcos  
Sonoma  
Stanislaus

basis. An exemption from these rules would not prevent CSU from continuing its energy efficiency, nor from tracking its energy use.

- Provide funding for new meters. CSU has 453 buildings greater than 50,000 SQF. We currently estimate the cost to individually meter all buildings greater than 50,000 SQF would cost approximately \$9.1 million. Unfortunately, CSU lacks the funding to achieve this before the disclosure requirement.

CSU looks forward to the release of proposed rules, and to working with the Energy Commission on improving them to ensure their successful implementation.

Should you have questions, please do not hesitate to call me at (562) 951-4090 or Aaron Klemm, Chief of Energy and Sustainability at (562) 951-4122, [aklemm@calstate.edu](mailto:aklemm@calstate.edu).

Sincerely,



Elvyra F. San Juan  
Assistant Vice Chancellor

ESJ:AK:hk

**Distribution:**

Aaron Klemm, Chief of Energy and Sustainability, CSU Office of the Chancellor  
Michael Clemson, Energy and Sustainability Analyst, CSU Office of the Chancellor