

## DOCKETED

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**2016-03 AB 802 Workshop Presentation\_TRC Comments**

*Additional submitted attachment is included below.*



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# MEMORANDUM

April 8, 2016

California Docket Number: 15-OIR-05

Project Title: Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802

Document Title: Corrected Presentation - AB 802 Benchmarking Initial Proposal

From: Matthew Vadney (TRC Energy Services)

Cc: Sophia Hartkopf (TRC Energy Services)

## TRC ENERGY SERVICES COMMENTS

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The following comments are in response to the March 25, 2016 AB 802 workshop presentation. Thank you for the opportunity to provide input.

1. Slide 9 lists 'Key Themes and Goals', which states, "Don't require utilities to verify building ownership."
  - a. TRC advocates for the CEC to revisit the methodology for verifying building ownership.
  - b. The current utility requirements listed under Section 2. Data Access (Slide 5) state that to verify building ownership, "Following should be sufficient: A copy of the deed, an active executed lease, or a recent mortgage statement." (Slide 23)
    - These documents referenced above are not readily available to the personnel in charge of benchmarking for a property. Instead, TRC recommends that the CEC require service providers to provide a standard, signed letter of authorization from the property owner, verifying that the provider can act on the owner's behalf.
    - Property staff should only be required to show that they work for the property owner, either through providing information on company letterhead or by providing accountholder specific data (property owner's account number, service address, etc.).
2. Slide 17, referencing Section 2. Data Access states, "The owner, agent, or operator of a covered building may submit a written or electronic request for energy use data from each utility serving a covered building by providing the building address."

- a. TRC recommends that the requestor also provide at least one account number associated with the building address. TRC is concerned that the building address does not always coincide with the utility service address. The meter mapping initiative may resolve this need; however, it is not uncommon for a building address to not be linked to the utility account.
3. Slide 19 informs that, "Utilities shall deliver the meter numbers, customer names, number of utility accounts, and building ID through the method of the building owner's, owner's agent's, or operator's choice."
  - a. TRC is very supportive of this recommendation. Including this information allows property owners to quickly access an inventory of important property data, including meter numbers.