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Bright Power, Inc. Response to AB 802 Revised Express Terms

Additional submitted attachment is included below.

September 28th 2017
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket Number: 15-OIR-05

Bright Power, Inc. CA Benchmarking Collaborative Response to AB 802 Revised Express Terms posted September 14th 2017

Bright Power, Inc. respectfully submits these additional public comments in response to Docket Number 15-OIR-05, Revised Express Terms (15-Day Language) for AB 802 Benchmarking Program.

Bright Power, Inc. provides energy and water management services to both affordable and market-rate multifamily housing to optimize energy and water performance and comfort over the long-term.

Respectfully,

Veronica Thomas
Data Manager

Jon Braman
VP of Strategic Initiatives

Jeannine Cooper
Senior Energy Analyst

Section	Draft Regulation Language, proposed changes	Context:
1681 (a)	Active: A Utility Account is considered "Active" if (1) it is receiving Energy at the time of the request or received energy during the reporting period for which data is requested, and (2) the postal address that the Utility Account is currently serving or served received Energy at any time during the time period for which Energy use data is requested.	This comment mirrors comments from the Center for Sustainable Energy, and is reiterated here because it is extremely important for provided totals of energy consumption at properties to represent total use. Without this clarification, the use of "and" for clauses (1) and (2), would allow an account that has been closed between the reporting period and the time of the request to be excluded from reported totals of energy use.
1681 (d)	Disclosable Building: A Covered Building of any property type defined by ENERGY STAR Portfolio Manager that has more than 50,000 square feet of Gross Floor Area, or two or more buildings located on a single parcel or adjacent parcels with the same owner of record, totaling greater than 100,000 square feet of Gross Floor Area	In our experience, most multifamily properties in California are garden style complexes, typically composed of many small buildings, each individually less than 50,000 square feet, but collectively often well above 100,000 square feet. Often these properties have shared services between the small buildings which may include a single meter for water, gas for a central domestic hot water plant that serves multiple buildings, or central services such as laundry in a separate building on the site. The current definition of disclosable building appears to exclude even very large garden style properties. We suggest broadening the definition to better align with how real estate companies think of their buildings – as whole properties, instead of as individual buildings. Existing definitions could mean that multiple parts of a large garden style complex could be required to submit data separately, and already mean that large portions of the state's multifamily sector would not be required at all. Broadening the definition also simplifies the process to allow a complex of buildings which share services (central water meter, exterior lighting, irrigation, pool, clubhouse, and leasing office) to submit their data as one site in EnergyStar Portfolio Manager. Under the current

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		definition if one or more buildings using common services/meters was considered a disclosable building, there would need to be an artificial division of the usage to that building for benchmarking purposes which is unlikely to be accurate. Services for the building which are not in the physical structure are not currently included – making it harder to do an 'apples to apples' comparison of multifamily properties.
1682 (b)(2)	For each Energy type, the Utility shall identify, aggregate, and provide all Energy use data for the requested building, in monthly intervals, based upon when the energy was consumed, for at least the previous calendar year, and all available data for the calendar year in which data is requested	Unless specified, utilities will typically provide aggregated data based on when the bills were issued. This data is significantly less useful for analysis and would greatly reduce the potential benefit to building owners and policy-makers. *In fact, we have within the last month received data that is not useful for analysis from LADWP which follows the current rule* (see Figures 1-3 below for details). In order to allow meaningful analysis of energy trends, data should be grouped in one of two ways: • Prorated into calendar months based on the meter read dates – i.e. a 100 kWh bill from 4/15 – 5/15 should attribute 50 kWh each to the April and May aggregation. • Provided raw with the meter read dates – i.e. 800 kWh used in bills covering 4/15 – 5/15 and 200 kWh used in bills covering 4/05 – 5/25, allowing the building owner to analyze, aggregate or prorate as needed. Neither of these options creates significant additional burden for utility companies or compromises tenant privacy, and has the added benefit of much more robust data for the purposes of the type of analysis that can drive efficiency gains across the state. If the purpose of benchmarking is to provide meaningful, actionable insights for property owners to act upon, then the data provided needs to enable meaningful, actionable analysis.

Figure 1: Sample data aggregated based on billing dates provided to Bright Power by LADWP in September 2017.

Start Date	End Date	Days Billed	Usage (kWh)
01/01/2016	01/31/2016	31	32,718
02/01/2016	02/29/2016	29	3,500
03/01/2016	03/31/2016	31	29,945
04/01/2016	04/30/2016	30	26,217
05/01/2016	05/31/2016	31	2,908
06/01/2016	06/30/2016	30	34,301
07/01/2016	07/31/2016	31	6,322
08/01/2016	08/31/2016	31	48,498
09/01/2016	09/30/2016	30	5,752
10/01/2016	10/31/2016	31	37,986
11/01/2016	11/30/2016	30	0
12/01/2016	12/31/2016	31	4,791
01/01/2017	01/31/2017	31	33,407
02/01/2017	02/28/2017	28	3,812
03/01/2017	03/31/2017	31	32,221
04/01/2017	04/30/2017	30	0
05/01/2017	05/31/2017	31	32,285
06/01/2017	06/30/2017	30	33,702
07/01/2017	07/31/2017	31	5,659
08/01/2017	08/31/2017	31	52,611

(graphed below in Figure 2)

The following is LADWP's explanation of the data format received over email:

"The information is correct; the data varies month to month based on the meter reads. Residential accounts are read and billed every two months while the common area accounts are read and billed monthly. The way the aggregation works is the period that the usage covers is placed in the month that it is billed. For example, if a bill was issued for 1/15/17 – 3/15/17, all the usage in that period would be placed in the month of March. The "low use" months are equivalent to common area meters only, with the larger months representing the tenant unit usage plus common area."

Explanation: In this sample data from LADWP, data is aggregated across both common area and residential meters by billing date. Common area meters are billed monthly but residential meters are billed every two months. Because the residential usage is entirely put into the month in which it is billed, the data stream shows artificial changes throughout the year that do not reflect variations in energy use. "Low" months essentially show only common area usage, while high months show common area usage for one month and residential usage for two months. This creates a pattern of consumption that does not reflect when energy is used greatly hampering detailed analysis of trends (such as separation of heating, cooling and baseload consumption), and making meaningful measurement and verification of energy savings from retrofit projects very difficult. Figure 2 below shows this data graphically. Figure 3 shows a similar data stream grouped instead by when energy is consumed, revealing true patterns of consumption.

Analysis Using Existing Data Specifications	Analysis Using Proposed Specifications
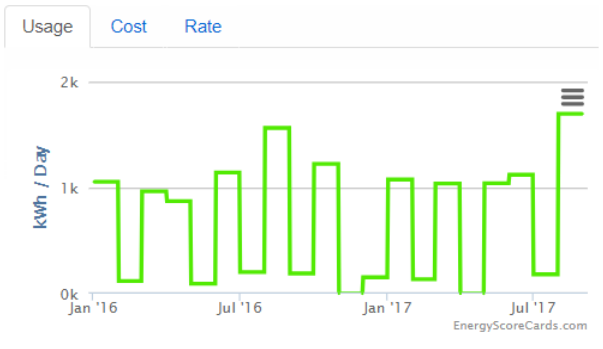	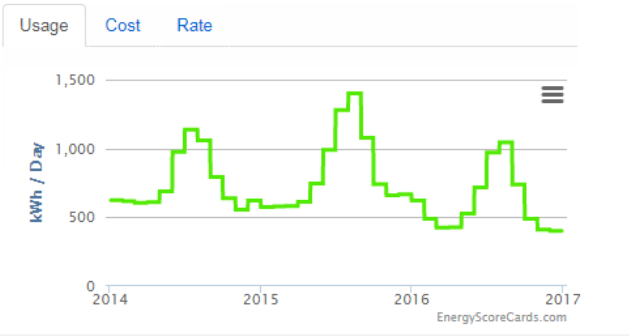
Figure 2: Analysis when graphed. Notice inconsistent spikes and dips, making usage trends hard to determine.	Figure 3: Prorated usage calculated based on utility data provided including meter read dates.) Notice that trends can be observed in data.

	• Seasonally – there is a noticeable spike in usage during the summer months (indicative of a cooling load) • Drop in usage in early 2016 – the owner of this building installed LED lighting in all units around Feb 2016 and we see a corresponding drop in usage around that time.