

DOCKETED

Docket Number:	16-OIR-03
Project Title:	Energy Data Collection
TN #:	214030
Document Title:	SCE Comments on Title 20 Data Collection Regulations
Description:	N/A
Filer:	System
Organization:	SCE
Submitter Role:	Public
Submission Date:	10/17/2016 2:44:02 PM
Docketed Date:	10/17/2016

Comment Received From: Catherine Hackney

Submitted On: 10/17/2016

Docket Number: 16-OIR-03

SCE Comments on Title 20 Data Collection Regulations

Additional submitted attachment is included below.

October 17, 2016

California Energy Commission
Docket Office, MS-4
Re: Docket No. 16-OIR-03
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 16-OIR-03: Staff Workshop on Title 20 Data Collection Regulations to Support New Analytical

Dear Commissioners:

On September 26, 2016, the California Energy Commission (Energy Commission), held a workshop to discuss and seek comments from interested parties regarding energy data collection to support the implementation of Senate Bill 350 (SB 350, de Leon, Chapter 547, Statutes of 2015), Assembly Bill 802 (AB 802, Williams, Chapter 590, Statutes of 2015), and improve California-related energy analytics.

SCE supports the goals of SB 350 and AB 802 and recognizes the importance of improving data collection to enhance demand forecasting efforts and inform long-term planning and policy-making. SCE looks forward to collaborating with the Energy Commission and other stakeholders to provide data that is technically feasible to obtain, legally permissible, and which improves the efficacy of the demand forecast and planning efforts.

In these comments, SCE describes its ongoing efforts to improve demand forecasting through its Grid Modernization process, as well as the existing constraints that complicate the utilities' ability to collect and share the data. SCE acknowledges the value of the Energy Commission being able to enhance and improve its planning and forecasting work. SCE therefore looks forward to constructively coordinating with the Energy Commission and other stakeholders to inform and improve the collection and sharing of data that is necessary to support the Energy Commission's demand forecasting efforts.

SCE believes that if parties work collaboratively, the goals of SB 350 and AB 802 can be accomplished in a manner that protects customer privacy and confidentiality, and utilizes resources responsibly and efficiently. SCE looks forward to participating in an ongoing dialogue with the Energy Commission and other stakeholders to continuously improve and refine data

collection needs as this rulemaking proceeds. SCE also specifically recommends that the Energy Commission establish a working group to address data collection and forecasting needs related to transportation electrification infrastructure and electric vehicles (EVs), due to the breadth of stakeholders involved in such efforts and their ability to consolidate important information and address remaining gaps in this field.

A. Consistent with Energy Commission’s Objectives for Data Collection Regulations, SCE is Undertaking Efforts to Improve Demand Forecasting Through Grid Modernization

SCE supports the Energy Commissions’ interest in improving the accuracy of demand forecasting and resource planning. As described in SCE’s 2018 General Rate Case (GRC),¹ SCE’s current planning tools do not enable it to plan for the future grid, such as by developing load and distributed energy resource (DER) profiles, forecasting at a granular level, and evaluating the potential for DERs to provide grid services. SCE requires a new set of tools to develop long-term load, DER and generation forecasts and to perform various technical studies and analyses.

To address these concerns, SCE plans, through its Grid Modernization process, to implement technologies and systems that will assist SCE in accessing more granular generation data—including customer meter data—for DER and load forecasting purposes. As noted in Volume 10 of SCE’s GRC testimony, SCE intends to develop planning tools and software that will enable system planners to perform analyses with greater accuracy and at a much more granular level. Because SCE is still in the early phases of developing the tools and mechanisms that will allow it to collect certain data identified in the Title 20 Data Collection Regulations, such as hourly metered data for some DERs, SCE proposes to work with the Energy Commission over time as it gleans better information through its grid modernization efforts.

In addition, SCE looks forward to working with the Energy Commission to determine the appropriate means of providing more granular data for forecasting purposes in a manner that maintains our commitment to customer protection and is consistent with legal and regulatory requirements. Noncompliance with the existing customer consent process has led to several complaints by customers regarding access by third parties to their customer energy end use and related data without the customers’ consent. By aggregating data that is customer-specific, utilities have been able to provide information to regulatory agencies in a way that does not compromise customer privacy.

B. SCE Does Not Have the Technological Ability to Comply with Certain Draft Title 20 Regulatory Provisions

As noted in Section A, due to current limitations in SCE’s available tools for accessing data at a more granular scale, SCE’s data for behind-the-meter (BTM) resources—such as distributed generation, energy storage, EVs and fuel cell resources—is limited to a small subset

¹ See Southern California Edison 2018 General Rate Case – Transmission & Distribution (T&D) Volume 10 – Grid Modernization.

of the total BTM resources. Because these technologies are not required to be separately metered, SCE can provide estimates, but not actual data, for these resources.

EV customers who SCE serves on rate schedules TOU-EV1, TOU-EV 3, TOU-EV4, as well as all Charge Ready customers, are metered separately, but represent a small fraction of the EV load. In addition, SCE can only collect data for EV-owners who opt-in to provide that data. SCE expects that technologies will evolve in a manner that will allow SCE to provide improved estimates.

C. SCE Agrees with CalETC's Recommendations to Adopt Straightforward and Simple Provisions Governing EV Data

To ensure efficiency and alignment with State goals, SCE recommends that the Energy Commission promulgate regulations affecting EVs that are straightforward and simple and that do not hamper the progress of the EV market. For example, as noted in CalETC's comments on the Title 20 Data Collection Regulations, financially penalizing charging station operators who fail to comply with reporting obligations could have a detrimental impact on the deployment of charging infrastructure. Similarly, the draft Title 20 Regulation, as it is currently drafted, imposes a technologically infeasible requirement on all owners or operators of charging stations at all power levels (most of which are individual customers) to collect individual data. SCE hopes to collaborate with the Energy Commission and stakeholders to find a more practical and feasible manner to improve the charging station forecast data, such as through a working group.

D. SCE Supports CalETC's Recommendation to Convene an Electric-Vehicle Data Working Group

SCE agrees with CalETC's recommendation that the Energy Commission convene an EV data working group to address issues relating to EV and transportation electrification infrastructure forecasting, data collection and analysis. As noted in CalETC's comments, given that charging-station data is already being collected through multiple forums, the regulation would benefit from the expertise of a working group comprised of experts from the Energy Commission, other agencies, utilities, universities, national laboratories and research organizations.

E. Data Collection Should be Limited to Data that Will Help to Enhance Forecasting, and Should Not Duplicative

Energy end-user data from surveys may be valuable, but SCE recommends that the Energy Commission utilize a judicious approach to data collection by only collecting that which is necessary and will provide direct value to the demand forecast. Pages 42-48 of the draft Title 20 Regulations request very detailed data that may require significant resources. To make the most effective use of resources, SCE recommends that the Energy Commission work with utilities and stakeholders to determine the specific data that is necessary to inform Demand Forecasting. Furthermore, to avoid duplicative efforts, SCE recommends that the Energy Commission engage in interagency coordination to determine what information may already be reported and available for use in its forecasting efforts.

California Energy Commission

Page 4

October 17, 2016

In conclusion, SCE appreciates the Energy Commission's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission and stakeholders. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney