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Data Collection Regulations**

Additional submitted attachment is included below.

STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION

In the Matter of:

Developing Regulations,
Guidelines, and Policies for
Implementing SB 350 and AB 802

Docket No. 16-OIR-03

Comments of the Anaheim Public Utilities on the
Commissioner Workshop on Title 20 Data
Collection Regulations

December 12, 2016

**Comments of the Anaheim Public Utilities Department on Commissioner
Workshop on Title 20 Data Collection Regulations**

Anaheim Public Utilities (“APU”) thanks you for the opportunity to provide comments on Title 20 Data Collection Regulations, as discussed at the November 16, 2016 Lead Commissioner Workshop pursuant to Energy Data Collection. Changes made to the original draft language (“Draft Language”) are an improvement, and have addressed some concerns. The Commission’s invitation to provide additional feedback on the Draft Language and the effect on APU is appreciated.

APU offers the following section-specific comments to clarify unclear provisions, identify data that some utilities may not have, provide insight on how the Draft Language may affect APU operations and to recommend possible solutions.

SECTION 1304 (a) REPORT BY POWER PLANT OWNERS

The Draft Language requires that, “if available, include any information obtained using the approved test methodology and detection limits specified by the US. Environmental Protection Agency in

40 CFR §141 for analyzing the constituents in a water supply.”¹ The referenced code governs National Primary Drinking Water Regulations and may not be applicable to power plant owners. APU encourages the Commission to clarify the referenced code that addresses the approved test methodology and detection limits.

SECTION 1304 (b) REPORT BY UDCs

The Draft Language removes the 100-kilowatt limit of power plant reporting requirements, and requires UDCs to report a master list of all in-front-of and behind-the-meter generation, including battery storage. The submission will include a comprehensive list of residential solar PV or home battery units regardless of installed capacity. APU currently has over 2,000 solar installations within the UDC territory. With customer side installations expected to grow exponentially due to technology changes and market penetration, tracking small generation or storage units can only offer similar insight as tracking individual AC units.

APU understands the Commission’s desire for accurate and detailed demand forecasts; however the Commission can achieve this goal by reviewing the estimation techniques as required in Draft Language Section 1344 (a), and through data collected in Draft Language Section 1344 (g) Hourly Load Estimates by Load Modifier and Subareas, where LSEs are required to submit hourly load estimates of behind-the-meter generation technologies and storage system types.

SECTION 1344 (a)

The Draft Language requires LSEs that do not have the metering infrastructure in place to provide hourly customer load data to submit an alternative estimation technique for pre-approval, along with “the process the LSE will follow to come into compliance for future submissions of the required data.”² While the proposal offers greater flexibility than the original proposed language, the Draft Language still implies that all POUs must fully implement an Advanced Metering Infrastructure (AMI) ”to come into compliance for future submissions”². APU strongly objects to any language implying non-compliance if a statistically valid estimation technique is provided.

¹ Section 1304 (a) (3) (A) 1. e., Title 20 Data Collection Regulations Proposed Language for Discussion at the November 16, 2016 Commissioner Workshop

² Section 1344 (a), Title 20 Data Collection Regulations Proposed Language

APU's Governing Board approved the capital necessary for APU's current level of AMI infrastructure investment based on costs and business needs. APU's AMI meters represent 70% of total load, but only 7% of the total number of customers. The existing AMI infrastructure sufficiently supports APU's internal data needs. Rough estimates place total AMI implementation for APU at a cost of at least \$50M over the next 10 years, with an additional \$2M ongoing annual O&M expenses; including load research, software licenses, and hardware maintenance and replacement. APU recommends language that limits the Energy Commission's role only for review and endorsement of the estimation techniques developed by utilities, and defer to local governing boards to determine whether or not a full AMI implementation is in the best interest of its utility and customers.

Moreover, the Draft Language also states, "In evaluating proposed plans the Commission may use the following criteria which each LSE's plan must include: ... (4) cost of implementation; and (5) the preceding year's annual revenues reported to the United States' Energy Information Administration on Form 861."³ APU believes that cost of implementation and annual revenues are irrelevant to and unnecessary for hourly load estimates, and therefore should be excluded from the Draft Language.

SECTION 1344 (a) (d) (g) ACTUAL LOAD VS. LOAD ESTIMATES

Section 1344 (a) states, "Hourly load data requirements specified in sections (b) – (h) shall be prepared using actual load metering data"; however, Section 1344 (d) asks for "Hourly Load Estimates by Customer Sector" and Section (g) asks for "Hourly Load Estimates by Load Modifier and Subareas." From the Draft Language, it is not clear if Sections (d) and (g) request only historical actual, estimated actual, or estimated hourly load forecasts. APU asks the Commission staff to clarify the Draft Language in the next proposal.

SECTION 1344 (g) HOURLY LOAD ESTIMATES BY LOAD MODIFIER AND SUBAREAS

Section 1344 (g) (1) (D) requests hourly load estimates by "light-duty plug-in on road electric vehicle, including disaggregation by vehicle type (for example, full battery electric and plug-in hybrid electric), tariff, and metering detail." APU suggests changes to Draft Language as tariff and metering are linked to Electric Vehicle Supply Equipment (EVSEs), not electric vehicles (EVs).

³ Section 1344 (a) (4) and (5), Title 20 Data Collection Regulations Proposed Language

APU can provide hourly load estimates based on utility-owned fleet; however, does not have information regarding EVs purchased, exchanged or sold within the service area. APU also does not have information on non-resident EVs driven to visit or to work within the UDC area. A more comprehensive EV data source may be DMV's annual EV information submittal to CARB. APU encourages the Commission to obtain the information and share findings with utilities to provide greater accuracy on hourly load estimates by EV load.

In addition, Section 1344 (g) (3) and (4) states, "An electronic file containing geographic identifiers of the subarea shall be included; "as well as, "Subareas are climate zones or geographic subdivisions of the transmission system areas specified by the Energy Commission."

APU's actual load and load forecasts are not segregated by subareas. Rather, actual load and load forecasts are completed as one aggregated area, which has been sufficient for previous resources planning purposes. APU asks the Commission to further clarify how the subareas are determined and how often changes may occur.

SECTION 1344 (h) LOAD FOR NETWORKED ELECTRIC VEHICLE SUPPLY EQUIPMENT

Section 1344 (h) requires EVSE providers to submit a master list of all networked EVSEs. APU understands the need to obtain such information for California's demand forecast, but would like to point out that utilities have very limited information in this regard.

As an example, APU currently owns and operates 12 networked EVSEs. All other charging stations within Anaheim are owned or operated by third party providers. APU encourages the Commission to work with third party EVSE providers to gather the information required by the regulation.

Thank you for your time and consideration. APU welcomes opportunities for continued collaboration with the Commission to ensure data collection across the Commission efficiently and effectively meets the intent of SB350 and AB802.

Respectfully Submitted,

Carrie Thompson

Carrie Thompson
Principal Integrated Resources Planner
Anaheim Public Utilities