

## DOCKETED

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| <b>Project Title:</b>   | Energy Data Collection  |
| <b>TN #:</b>            | 221270  |
| <b>Document Title:</b>  | CMUA, NCPA, and SCPPA Comments On Proposed Additions to and Modifications of Regulations Concerning Data Collection                             |
| <b>Description:</b>     | Joint comments from California Municipal Utilities Association, Northern California Power Agency and Southern California Public Power Authority |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | CMUA, NCPA, and SCPPA   |
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*Comment Received From: CMUA, NCPA, and SCPPA*

*Submitted On: 9/20/2017*

*Docket Number: 16-OIR-03*

## **On Proposed Additions to and Modifications of Regulations Concerning Data Collection**

*Additional submitted attachment is included below.*

**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**

**RE: Title 20 Data Collection Regulations to Support New Analytical Needs**

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**JOINT COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES ASSOCIATION, NORTHERN CALIFORNIA POWER AGENCY, AND SOUTHERN CALIFORNIA PUBLIC POWER AUTHORITY ON PROPOSED ADDITIONS TO AND MODIFICATIONS OF REGULATIONS GOVERNING DATA COLLECTION**

The California Municipal Utilities Association, Northern California Power Agency, and Southern California Public Power Authority (“Joint Utilities”) appreciate the opportunity to provide these joint comments to the California Energy Commission (“Commission”) on the *Proposed Additions to and Modifications of Regulations Governing Data Collection* (“Proposed Regulations”) released on August 4, 2017. In the Proposed Regulations, Commission staff have provided express terms for data collection under Title 20 of the California Code of Regulations. The Proposed Regulations are intended to “address the Commission’s rules or practice and procedure for data collection” and impact Utility Distribution Company (“UDC”) data collection and disclosure.<sup>1</sup>

**I. JOINT COMMENTS**

**A. The Express Terms of the Proposed Regulations Make Positive Changes Related to Small UDC Compliance Concerns**

The Joint Utilities appreciate the changes to the Proposed Regulations made by Commission staff in response to compliance concerns from smaller UDCs. As noted in the

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<sup>1</sup> Title 20 Notice of Proposed Action at 1 (August 4, 2017).

previous comments,<sup>2</sup> there is not a homogenous infrastructure among UDCs for metering throughout California, so the format and detail of information requested by these Proposed Regulations is not available for smaller UDCs. Therefore, the changes to the Proposed Regulations for smaller UDC applicability are a helpful improvement, and the Joint Utilities thank Commission staff for their efforts on this issue.

**B. The Joint Utilities Urge Collaboration in Data Collection to Reduce the Cost and Administrative Burden in Large UDC Reporting Measures**

The information to be gathered for large UDCs under section 1353 of the Proposed Regulations is wide ranging and, as acknowledged in the Initial Statement of Reasons,<sup>3</sup> will entail additional costs and administrative burden for the UDCs tasked with this report. For this reason, the Joint Utilities recommend Commission staff continue to examine concurrent Commission proceedings and coordinate on data collection efforts. For example, the Commission is presently implementing AB 802 regulations, which also entails the disclosure of energy usage information to the Commission.<sup>4</sup> Collaboration among Commission proceedings, as well as among other state agencies that have access to the same data (such as the California Department of Motor Vehicles for electric vehicle information) will benefit the Commission and stakeholders alike.

Similarly, the Joint Utilities recommend staff discussions with the large UDCs as these regulations are implemented. As noted in past comments, some of this information under proposed section 1353 may be difficult to retrieve, and more efficient solutions to this information collection may emerge. For example, Commission staff helpfully responded to an opportunity for data collection efficiency in a clarification at proposed section 1306(a)(5), which notes that since larger UDCs now report under proposed section 1353, they do not have to provide the older section

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<sup>2</sup> See California Municipal Utilities Association Comments at 1-3 (December 12, 2016); *see also* comments of Burbank and Riverside (December 12, 2016).

<sup>3</sup> *See, e.g.*, Data Collection Initial Statement of Reasons at 20-23 (August 4, 2017).

<sup>4</sup> *See* Proposed Section 1683 of AB 802 Regulations at 15-OIR-05 (September 14, 2017).

1306(a) quarterly report. Continuing staff discussions on data collection will be greatly appreciated.

**C. The Proposed Phase Two of Data Collection Regulations Should Not be Rushed**

As detailed in an April 7, 2017 Commission staff memorandum, Commission staff has proposed a two-phase schedule for Title 20 data collection.<sup>5</sup> A second phase of Title 20 data collection revisions may come as early as Fall of this year, and includes subjects such as electric vehicle charging data, environmental data, balancing authority information, and wind performance data.<sup>6</sup> Given these large subject matters, the Joint Utilities encourage Commission staff to review the existing data collected related to phase one ahead of initiating a phase two and before requesting additional information from UDCs. Phase one changes are still proposed as of September 20, and rushing to meet a Fall 2017 timeframe would likely result in a less effective proposal.

**II. CONCLUSION**

The Joint Utilities appreciate the opportunity to provide these comments to the Commission on the Proposed Regulations.

Respectfully,

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<sup>5</sup> Staff Memorandum on Title 20 Data Collection at 1 (April 7, 2017).

<sup>6</sup> *Id.*