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SMUD Comments on Data Collection Rulemaking 15-Day Language

Additional submitted attachment is included below.

**STATE OF CALIFORNIA
BEFORE THE CALIFORNIA ENERGY COMMISSION**

In the matter of:)	Docket No. 16-OIR-03
)	
Developing Regulations, Guidelines, and Policies for Implementing SB 350 and AB 802)	SMUD Comments On Data Collection Rulemaking 15-Day Language
)	
)	February 13, 2018

**Comments of the Sacramento Municipal Utility District on:
*Data Collection Rulemaking 15-Day Language***

Thank you for the opportunity to provide comments on the 15-Day Express Terms for the Data Collection Rulemaking (“15-day language”), intended to update the California Energy Commission’s (“CEC”) Title 20 data collection regulations to support the implementation of Senate Bill No. 350 (“SB 350”), Assembly Bill No. 802 (“AB 802”), and improved energy analytics at the CEC.

SMUD appreciates the multiple opportunities CEC staff has provided for stakeholder feedback and believes this iterative process has produced improved regulations. While we remain concerned that the data sought presents potential customer privacy and data security risks, SMUD believes there have been numerous improvements to the language.

Section 1304(b). SMUD appreciates the changes in Section 1304(b) regarding reports by Utility Distribution Companies (“UDCs”). In our comments on the Data Collection Express Terms submitted to the CEC on September 20, 2017 (“previous language”), we commented that removing the 100 kilowatt (kW) threshold for reporting would be problematic. We explained that much of the listed data requirements for these reports, while available generally for systems of 100 kW or greater, are not available for smaller systems. The changes included in the 15-day language – adding the term “for which data is collected” as well as the distinction of required information among larger power plants, smaller power plants, and energy storage systems – help ease this concern.

Section 1344(f). Additionally, SMUD believes the changes to the Section 1344(f) language regarding emerging load impacts are positive. While the previous language focused on behind-the-meter systems and required any analysis and supporting data, the 15-day language asks for a summary of any load research data used to look at load impacts of these emerging loads, without distinction between behind-the-meter and system.

Section 1353(b)(2). Further, SMUD appreciates the delay in reporting interval data by one year, as reflected in Section 1353(b)(2). SMUD believes an additional year will help the CEC better prepare to securely process the immense amount of data utilities will be providing. SMUD looks forward to working with the CEC and other utilities and stakeholders to ensure that the interval data provided to the CEC will be:

- Held securely against cyber threats and other risks, protecting customer privacy;
- As useful as possible for the CEC, by understanding better how the data can be used, or may not be useful for, pursuing California's policy goals and the CEC's analytical needs; and
- Provided with minimal administrative burden and cost to the utilities.

Thank you again for the opportunity to comment on the 15-day language.

/s/

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cc: Corporate Files (LEG 2018-0079)