

DOCKETED

Docket Number:	16-OIR-03
Project Title:	Energy Data Collection
TN #:	222608
Document Title:	Northern California Power Agency Comments on Proposed Title 20 Data Collection Regulations
Description:	N/A
Filer:	System
Organization:	Northern California Power Agency
Submitter Role:	Public Agency
Submission Date:	2/20/2018 9:12:02 AM
Docketed Date:	2/20/2018

Comment Received From: Northern California Power Agency

Submitted On: 2/20/2018

Docket Number: 16-OIR-03

NCPA Comments on Proposed Title 20 Data Collection Regulations

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the Matter of:

Title 20 Data Collection

Docket No. 16-OIR-03

15-day Express Terms

**NORTHERN CALIFORNIA POWER AGENCY’S COMMENTS ON
EXPRESS TERMS FOR THE TITLE 20 DATA COLLECTION RULEMAKING**

The Northern California Power Agency (“NCPA”) appreciates the opportunity to comment to the California Energy Commission (“CEC”) on the 15-day express terms for the Title 20 Data Collection rulemaking, which were published on January 26, 2018. In general, NCPA supports the adoption of the proposed additions to and modifications of regulations governing data collection¹, and encourages the CEC to continue to explore refinements and improvements to the larger regulatory apparatus of energy data reporting.

I. NCPA SUPPORTS EXPRESS TERMS REPORTING PRECEDENT

The express terms modify to Section 1304(b) to establish a new reporting threshold. Specifically, the modification limits the reporting obligation of a utility distribution company (“UDC”) to “data for each power plant and energy storage system located in the UDC’s service area and for which data is collected.” Additionally, the express terms add Section 1353 to requires a UDC that has experienced a peak electricity demand of 1,000 MW or more in both of the two calendar years preceding to report of disaggregated demand data. Similar to the precedent established in Section 1304(b), paragraph (a)(2) of Section 1353 states that, “No entity subject to reporting requirements pursuant to this Section shall be required to provide data or reports that it does not collect in the regular course of business; however, if the entity begins to

¹ 20 CCR § 1301-§ 1313

collect some or all of the data not previously collected, it must submit the data in accordance with the requirements of this section.”

While NCPA recognizes the need to collect and track operational data on energy storage systems for some customer-owned or customer-sited installations, the UDC may not currently require or collect operational data on the energy storage system. The lack of UDC access to operational data may also occur with distributed generation and electric vehicle supply equipment. In similar fashion, not all UDCs have installed meters capable of collecting demand data on an hourly interval basis.

NCPA has previously raised concerns about reporting requirements for data publicly owned utilities (“POUs”) cannot or do not have access to. The modification to Section 1304(b) and the addition of Section 1353(a)(2) in the express terms address that concern and set a precedent for future reporting expectations. NCPA strongly supports the inclusion of both provisions.

II. NCPA IS ASSISTING MEMBERS WITH DATA INITIATIVES

With increasing penetrations of customer-owned or -sited energy resources, NCPA member utilities are facing new data infrastructure and management challenges. In many cases, legacy billing and customer information systems have reached their natural end of useful life and need replacement. For small POUs, such as NCPA’s member utilities, addressing these data needs can be daunting and capital intensive. Much the same as NCPA has provided technical assistance and economies of scale in the operation of power plants, NCPA has taken steps to support its members in updating their respective metering infrastructure and data management systems.

In 2015, NCPA convened the Smart Grid Working Group as an ad hoc committee initially tasked with supporting members in selecting new customer information systems (“CIS”) and/or meter data management systems (“MDMS”). In addition to assisting members with evaluating CIS and MDMS options, the Smart Grid Working Group was able to identify the specific challenges NCPA members face in deploying advanced metering infrastructure (“AMI”), or smart meters. The primary barrier was simply the cost of AMI deployments versus the quantifiable benefits to the customers and individual utilities.

To address the AMI cost barrier, in November 2017, NCPA reached an agreement in principle to jointly purchase the assets of Hometown Connections, Inc. (“HCI”). HCI was established in 1998 as a utility services subsidiary of the American Public Power Association to provide a competitive purchasing advantage to POU’s nationally for products and services. Of particular interest to NCPA, HCI will provide advanced metering systems and data management services to NCPA member utilities.

Replacing CIS and upgrading metering infrastructure are complicated endeavors, but will equip NCPA member utilities with the resources they need to operate in an increasing decentralized electricity sector. These new systems will not be in place overnight, though. NCPA appreciates the accommodations provided by the CEC regarding the reporting of interval data until such a time as that data is available. This allows POU’s the discretion to make smart grid system improvements that work best with their existing systems and infrastructure.

III. CONCLUSION

NCPA appreciates the CEC’s consideration of these comments, as well as those which we have previously submitted and are now incorporated into the express terms. NCPA looks forward to continuing our collaboration with the CEC on improving the data reporting processes

to equip the CEC to prepare required electricity assessment and forecasts while not unduly burdening POU's, and their customers, with data reporting costs.

Respectfully submitted,

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