

## DOCKETED

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*Comment Received From: Steve Uhler*

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## **Minimize Overlapping Reporting Requirements**

Minimize Overlapping Reporting Requirements

Comments on Collecting data, re CEC-200-2017-002-SD, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=216093>.

Collect data in normalized form. By doing so, the reporting systems will be more stable. You won't be replacing prior reporting methods or forms, such as Form S-1 with new ones, just to get additional parameter data.

Publish the data dictionaries and import formats for the models this data you wish to collect will inform.

Hipper POUs will devise automated methods to supply the data other than spreadsheet format, avoiding errors such as found in this CEC spreadsheet; RNS\_Update\_Report\_Operational\_Generation.xlsx, [http://www.energy.ca.gov/almanac/renewables\\_data/net\\_short/RNS\\_Update\\_Report\\_Operational\\_Generation.xlsx](http://www.energy.ca.gov/almanac/renewables_data/net_short/RNS_Update_Report_Operational_Generation.xlsx), that appears yet another CEC WOM (Write Only Memory).

I will continue to use this CEC QFER based report to track GHG and power plant utilization, <http://ugemrp.com/1066/0001/0-004-03267-03126-2015.htm>, see attached.

By monitoring input GHG sources, I will know the GHG trend. This reporting should be available closer to realtime with a true "Smart Grid".

Old data is data that is over a week old. "Big data" often is nothing more than data that is not processed in a timely manor. Like not doing the dishes for a week. Guess you could call not doing the dishes for a week "Big Dishes"?

The Grid is not a "Smart Grid" until the metering equipment is used for realtime reporting. Anything else is like driving a car by looking only at the rear view mirrors.

What you have passed by will often have little meaning as to what you will encounter in the near or far future, if you are doing it right and hitting your targets.

Look forward in realtime, not backward at year old data that has been averaged without showing sample sizes, such as <https://efiling.energy.ca.gov/GetDocument.aspx?tn=216076> and charted here [http://ugemrp.com/cec/smud/residential/1\\_6c/index.htm](http://ugemrp.com/cec/smud/residential/1_6c/index.htm).

You might say statute does not require it? That does not mean realtime data will cost more or be harder to do, realtime data often is easier and cost less, if you do it right.

ever onward,

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*Additional submitted attachment is included below.*



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14:43 Wednesday, 2017-March-15

# California Power Content: Power Plants

## County - State - Year

Sacramento - CA - 2015

[2014](#)

Item	CO2 lbs	Owner	Net kWh	Capacity, kW	Utilization %	CO <sub>2</sub> lbs per kWh	CO <sub>2</sub> lbs per kWh Graph
1	4,946,240,904	<a href="#">Sacramento Municipal Utility District (SMUD)</a>	5,727,748,050	976,300	66.97	0.86	
2	462,777,585	<a href="#">Central Valley Financing</a>	416,066,010	119,500	39.75	1.11	
3	0.00	<a href="#">United States Bureau of Reclamation</a>	232,926,000	220,500	12.06	0.00	
4	"	<a href="#">Recurrent Energy LLC</a>	158,121,000	69,400	26.01	0.00	
5	"	<a href="#">County of Sacramento Waste Management</a>	57,738,000	9,150	72.03	0.00	
6	"	<a href="#">Sacramento PV Energy LLC</a>	48,708,240	25,000	22.24	0.00	
7	"	<a href="#">Not Available</a>	18,003,000	10,700	19.21	0.00	
8	"	<a href="#">OL Elk Grove Trust a Delaware Statutory Trust</a>	9,460,000	4,000	27.00	0.00	
9	"	<a href="#">Solar Tax Partners I LLC</a>	6,328,000	3,600	20.07	0.00	
10	"	<a href="#">Solar Tax Partners II</a>	4,158,000	2,400	19.78	0.00	
11	"	<a href="#">Radian Generation</a>	1,723,000	1,000	19.67	0.00	

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Note:

Greater than 3 pounds of CO<sub>2</sub> per kWh

Data Sources:

<http://www.eia.gov/oiaf/coefficients.html#tbl1>

<http://www.epa.gov/cpd/pdf/brochure.pdf>

[http://energy.ca.gov/almanac/electricity\\_data/web\\_qfer/source\\_files/q\\_WebWorks\\_QFERUnit\\_Table.txt](http://energy.ca.gov/almanac/electricity_data/web_qfer/source_files/q_WebWorks_QFERUnit_Table.txt)

[http://energy.ca.gov/almanac/electricity\\_data/web\\_qfer/source\\_files/q\\_WebWorks\\_QFERPlant\\_Table.txt](http://energy.ca.gov/almanac/electricity_data/web_qfer/source_files/q_WebWorks_QFERPlant_Table.txt)

[http://energy.ca.gov/almanac/electricity\\_data/web\\_qfer/source\\_files/q\\_WebWorks\\_QFERGeneratorAnnual\\_Table.txt](http://energy.ca.gov/almanac/electricity_data/web_qfer/source_files/q_WebWorks_QFERGeneratorAnnual_Table.txt)

[http://energy.ca.gov/almanac/electricity\\_data/web\\_qfer/source\\_files/q\\_WebWorks\\_QFERGeneratorMonthlyDescriptive\\_Table.txt](http://energy.ca.gov/almanac/electricity_data/web_qfer/source_files/q_WebWorks_QFERGeneratorMonthlyDescriptive_Table.txt)

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