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SoCalGas Comments on CEC Disaggregated Demand Data Cleaning Workshop

Additional submitted attachment is included below.

January 11, 2019

California Energy Commission
Docket Office, MS-4
Re: Docket No. 18-MISC-05
1516 Ninth Street
Sacramento, CA 95814-5512

docket@energy.ca.gov

Re: Southern California Gas Company's Comments on the California Energy
Commission Docket No. 18-MISC-05: Disaggregated Demand Data Cleaning
Workshop

Dear Commissioners:

On December 11, 2018, the California Energy Commission (CEC) held a workshop to
discuss and seek comments on draft proposed methods for collecting, processing, and structuring
of energy data as part of the its collection of customer-level billing data under the newly adopted
California Code of Regulations, Title 20, Section 1353 ("the workshop"). Southern California
Gas Company (SoCalGas) participated in the workshop and appreciates the opportunity to
provide these written comments on the CEC's Disaggregated Demand Data Cleaning

Question 1:

a. Are the proposed fields in the EnergyEfficiencyParticipation table appropriate for
evaluating meter-level impacts of EE participation on energy demand? If not, what
changes do you propose?

In the EnergyEfficiencyParticipation table, ServiceAccountID is not available in some cases
for EE participant and Premise ID is available only if Service Account ID is available.

Start Date is not available. End Date is the installation date for a specific measure. Claim
Date is the application date.

    b. IOUs report EE participation data to the California Public Utility Commission's CEDARS database. Staff has proposed that IOUs might provide additional data necessary to link CEDARS data to meter-level energy consumption data under Section 1353, in lieu of reporting participation data directly to the Energy Commission. Is there an efficient way to join these datasets? For example, by IOUs reporting a mapping between CEDARS claim IDs and Section 1353 meter or premise IDs. If so, please describe.

    SoCalGas recommends that a field for ClaimID should be added to the EnergyEfficiencyParticipation table to assist the claim data referencing with the CEDARS database.

Please note that the data reported to the CPUC's CEDARS database for any given calendar year does not represent all EE participants in the calendar year or any period within the year until the final annual report is filed.

    c. POUs report EE program-level data under Section 1311, but Section 1353 requires meter-level data. Which data from the POUs are sufficient for CEC staff to estimate EE impacts on demand at the meter level? What is the most efficient and effective way for the Energy Commission to combine POUs' EE data with IOUs' EE data?

    SoCalGas cannot respond to this question.

Question 2:

    a. During the workshop, staff suggested that a data flag indicating whether a bill is partial, in addition to the CCA and DA requirements above, would remove all ambiguity. Is this a reasonable solution?

The concern regarding completeness of billing also exists for Natural Gas service. The core aggregation program is somewhat equivalent to the direct access program and participants in the program may choose to include some of their service charges from the aggregators on the utility billing statement.

Service for all noncore customers is fully unbundled and they may choose their supplier for the commodity as well as a provider for access rights, storage and balancing options. SoCalGas only bills noncore customers the options that the noncore customers subscribe to directly from the utility.

The default for customers on transportation only service is that the SoCalGas bill only represents charges for utility services provided. SoCalGas can separately report amounts for utility provided services excluding third party charges. SoCalGas does not know what is included in the charges from the third-party providers and recommends they not be included. If needed these charges should be obtained from the third parties directly.

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There are also other items that will also cause the bill amounts reported to the CEC to differ from the total bill amount seen by the customer. These include line items added on the bill in support of some billing services provided on behalf of third party companies as a non-tariffed product and service and for On Bill Financing and Repayment options. SoCalGas will exclude charges from these services since it does not represent a utility service related cost item and are better considered a payment service.

b. Please provide any other feedback on this proposal or alternate suggestions for resolving these billing data concerns.

SoCalGas recommends that CEC only collect data related to services directly offered by the utilities. Items included on the utility bills from third parties be excluded.
For SoCalGas to provide third party related data, we may need to seek the clearance from the third party to provide such information. This data may be deemed sensitive market information that the third parties may not want disclosed.

Question 3:

Please provide any feedback or suggestions on how to structure and collect rate schedules in a way that captures options and modifiers. Ideally, a solution will be appropriate for all utilities. However, staff will consider suggestions that handle rate schedules differently for each utility if necessary.

For SoCalGas the only modifier not included in its rate schedule identifier is the CARE participation. SoCalGas recommends adding a data flag to indicate CARE program participation.

For noncore service, customers may split their service through a single meter onto multiple rate schedules. For these customers SoCalGas may only report the rate schedule representing with most usage or may leave the rate schedule null.

Question 4:

An alternate solution is for utilities to report unmetered consumption estimates in a separate table that includes limited geographic fields (e.g. city, state, zip) and allows the utility to report whichever are known.

a. Is this alternate solution the most reasonable approach for reporting unmetered consumption?

SoCalGas notes it has most of the geographic attributes for the unmetered services it bills. It does not have a meter id.

b. Please provide any additional feedback or suggestions on how to structure and collect unmetered consumption.

SoCalGas may encounter some difficulties for some of its unmetered service that is not billed in our system and may not be able to provide this information.

Question 5:

Please propose changes to the proposed source data schema for collecting and tracking submeter relationships.

When usage downstream of one meter is also metered, SoCalGas will bill for that downstream meter independently and will net usage from the upstream meter prior to billing for its charges.

Are there any other potential accounting errors staff should be aware of regarding submeters? If so, are any other changes required to avoid these errors?

Question 6:

Please provide any additional feedback or suggestions on the proposed source data schema, including which data fields should be reported and how they should be structured.

SoCalGas does not have additional feedback at this time but may at a later time as it attempts to extract the required data from its databases.

Question 7:

Please provide any additional feedback or suggestions on the proposed ETL methods and transformation rules. Please attach a list of specific ETL rules that you recommend

SoCalGas agrees that data quality checks should be included in the ETL methods and transformation and offers some suggestions for consideration. The CEC could request the submitting parties to include a check file with summary totals for the quantitative fields and counts of unique and total records. Other checks for uniqueness of file transmission could be performed by the CEC on the data received. A check for repeating patterns and validation of the maximum ending period contained in the transmission with that of a prior transmission from the same entity could help confirm the integrity of the transmission. SoCalGas expects to only transmit progressive records and these checks may ensure that the file transmission is for new records. These options could provide some level of check against transmission errors but should not be viewed as complete.

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Question 8:

Do you have any other feedback or suggestions which were not addressed in the prompts above?

SoCalGas has concerns about the February 15, 2019 due date for data delivery. It is recommended that once all the requirements have been finalized that the IOUs and POUs be given another 90-120 days to prepare the data, perform test file exchange and data verification. We request that the CEC issue a letter for the proposed timeline for testing and revisions to the date due date under Section 1353.