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HEA Comments on SST Joint LME LSEs Concept Design

Additional submitted attachment is included below.



HEA Comments on SST Joint LMS LSEs Concept Design

Home Energy Analytics, HEA, provides an app used by owners and renters of single or multi-family housing to reduce their energy use and explore the impacts of electrification. We have provided this service to over 70,000 customers in California since 2012. Since 2017 HEA has been the program implementer for HomeIntel, PG&E's pay for performance residential EE program, based on this app. Over 25,000 PG&E customers are actively participating in HomeIntel and see a reduction, on average, of 7.7% in their electric and gas use as reported by DMV on [EnergyDataWeb](#).

HEA has great interest in the SST. Implemented correctly, companies such as HEA could offer innovative and cost-effective energy savings and electrification analysis statewide. Currently, only PG&E provides the necessary data access required for accurate individual home analysis which provides the recommendations and support to effectively reduce energy use and guide users in their efforts to electrify their home. Home energy use is complex; almost without exception we have found that generic recommendations no longer provide the information customers need to make informed energy reduction and electrification choices. The wealth of AMI, rate and publicly available data is the basis for offering innovative products to customers. But only if that data is consistently and reliably available to qualified third parties.

The current document starts at the wrong step in the journey to offer innovative products and as it stands could create an unusable system. The question to be answered first for an SST is not how convenient or difficult it would be for the IOUs to build it, but how to make the SST truly valuable to rate payers. The starting point in this discussion should be to define use cases: how will a customer interact with SST; what benefit will the customer receive from interacting with SST; what are the potential benefits to the grid and therefore all rate payers. Stating that a customer can download their RIN and change rate plans on its own is not a benefit, it's merely an action. This document, or supporting document, should provide clear examples of how California residents would use this tool to achieve a beneficial outcome. That should be the starting point of the discussion on how to implement the SST.

This document reflects the input of only the utilities. Historically, this is not the group likely to develop tools that will be used by energy consumers. The groups most likely to develop customer-facing tools, such as HEA, are just now weighing in on the SST. But this is too late. HEA has experience dealing with thousands of energy consumers with our primary focus to provide them with a service they find compelling and easy to use. This is not the traditional perspective of the energy providers; their primary focus as regulated monopolies is not building innovative, cost effective, customer facing software. For the SST to be widely used it will need to be utilized by commercial organizations. If the SST isn't widely adopted by organizations independent of the utilities it won't matter what is costs; it will be a failure.

HEA's recommendation is to take a pause in the process of defining the SST and address the two points above:

- Identify several high value customer use cases from the perspective of the end user, with the focus being on the benefits to users and rate payers.
- Solicit input from organizations that would provide services through integration with the SST with the focus on how the organizations would integrate with the SST, what data and other



support they need to offer their services, and the benefit their services will provide to customers and rate payers.

Respectfully,
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