

**DOCKETED**

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<b>Project Title:</b>	Energy Data Analysis Program
<b>TN #:</b>	261937
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*Comment Received From: Efficiency First California  
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## **EFCFA Supports Energy Data Access Program**

*Additional submitted attachment is included below.*



February 24, 2025

**Subject: Comments on the Energy Data Analysis Program (EDAP) Proceeding - Docket 25-EDAP-01**

Dear California Energy Commission,

Efficiency First California appreciates the opportunity to submit comments on the Energy Data Analysis Program (EDAP) Public Presentation from February 10, 2025, related to Docket Number 25-EDAP-01. We support the CEC's efforts to facilitate data sharing and analysis between Governmental Entities (GEs) and the Commission, as outlined in the EDAP.

Efficiency First California believes **utility companies must share energy consumption data** to accurately determine potential savings. Sharing measured data with industry stakeholders will create a holistic view of energy usage and the impact of efficiency measures. A comprehensive understanding of energy use will allow contractors and program implementors to offer more affordable and practical solutions.

Efficiency First California has advocated using normalized consumption data to true-up our program implementation efforts with SMUD for years. Access to comprehensive data (gas data) will allow us to establish baseline energy consumption before our electrification projects. We can then compare energy consumption once the upgrades are complete.

Using **measured data instead of energy models** will allow us to improve our program's effectiveness and affordability. Our ultimate goal is to reward consumers who invest in efficiency and electrification projects with measurable savings.

Another benefit of having more access to comprehensive energy use data is that it can **increase program effectiveness via targeting**. Access to comprehensive, accurate consumption data will allow us to identify large energy consumers. We can then directly target these users with specific incentives or offers from our participating contractors. Targeting buildings that are large energy consumers will improve the outcome of our efforts, effectively increasing the performance per dollar spent and making these projects more impactful.

We are excited to finally see a clear pathway for sharing data while **protecting the personally identifiable information (PII) of utility customers**.

Efficiency First California believes that programs like EDAP are essential to maximizing the value of energy data while maintaining necessary privacy safeguards. We are encouraged by the CEC's approach and look forward to the program's development.

Sincerely,

A handwritten signature in blue ink that reads "Chandra Apperson".

Chandra Apperson  
Policy Director, Efficiency First California