

DOCKETED

Docket Number:	25-EDAP-01
Project Title:	Energy Data Analysis Program
TN #:	262091
Document Title:	Steven Moss Comments - LGSEC Comments on the Energy Data Analysis Program
Description:	N/A
Filer:	System
Organization:	Steven Moss
Submitter Role:	Intervenor Consultant
Submission Date:	3/5/2025 8:30:51 AM
Docketed Date:	3/5/2025

*Comment Received From: Steven Moss
Submitted On: 3/5/2025
Docket Number: 25-EDAP-01*

LGSEC Comments on the Energy Data Analysis Program

Additional submitted attachment is included below.



LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

520 Capitol Mall, #440 Sacramento, CA 95814 ☎ (916) 448-1198 ☎ www.lgsec.org

March 5, 2025

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Docket: 25-EDAP-01 Subject: LGSEC Comments on the Energy Data Analysis Program

Dear Commissioners,

The Local Government Sustainable Energy Coalition (LGSEC) appreciates the opportunity to provide comments on the California Energy Commission's (CEC) Energy Data Analysis Program (EDAP). LGSEC represents local governments and public agencies committed to advancing clean energy policies, equitable energy access, and data-driven climate action planning. We commend the Commission for launching this initiative, an important step toward improving local government access to energy data essential for proper planning while safeguarding privacy and security.

Support for the Energy Data Analysis Program

LGSEC strongly supports EDAP establishment and acknowledges the Commission's efforts to facilitate responsible data access for local governments. The program reflects a positive step to ensure that local governments have structured pathways to obtain energy data necessary for climate action planning, program design, and implementation. Inclusion of designated agents to handle confidential data on behalf of local governments is an innovative approach that can enhance analytical capacity while protecting privacy.

The Value of Existing Public Data Tools

It is important to leverage and integrate existing publicly available tools, such as the **Bay Area Regional Energy Network (BayREN)** and **UCLA Energy atlases**, which have been widely relied upon by local agencies and supported by Regional Energy Networks (RENs). These tools have significantly contributed to informed local decision-making, providing valuable insights without compromising confidentiality. Expanding upon such tools and allowing regional energy partnerships to engage with EDAP will further support local energy planning.

Supporting Academic Institutions as Agents

LGSEC strongly supports the inclusion of academic research institutions, such as the University of California, Los Angeles, as eligible designated agents under EDAP. Universities and research institutions have a demonstrated track record of conducting rigorous energy data analyses in the public interest. They are well-positioned to act as intermediaries, ensuring that confidential data is processed securely while producing insights that directly benefit local governments. Their expertise, credibility, and public service orientation make them an ideal choice for this role.



LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

520 Capitol Mall, #440 Sacramento, CA 95814 ☎ (916) 448-1198 ☎ www.lgsec.org

Alignment with CPUC Regulations

LGSEC urges the CEC to align EDAP with relevant **California Public Utilities Commission (CPUC) decisions**, specifically **Decision 23-02-002 (February 2, 2023)**. Ordering Paragraph 16 of this decision requires **Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas)** to fund and facilitate the **California Analysis Tool for Locational Energy Assessment (CATALENA)**. While CEC has clarified that EDAP is distinct from CATALENA, ensuring coordination between these programs will enhance data access and improve analytical consistency for local governments.

Additionally, **Ordering Paragraph 19** requires investor-owned utilities (**IOUs**) to share **disaggregated data** requested by Regional Energy Networks and third-party implementers or their authorized agents within **ten days** of verifying cybersecurity and confidentiality requirements. The EDAP program similarly relies on **designated agents** to handle confidential data on behalf of local governments. Ensuring consistency between CPUC's data-sharing directives and CEC's EDAP structure will provide local governments with clearer pathways to access critical energy data while maintaining strong data privacy and security protocols.

Concerns About Costs, Process, and Flexibility in Agreements

While LGSEC recognizes EDAP's potential benefits, we have concerns regarding the costs and administrative burden of procuring an agent. Many local governments, particularly smaller jurisdictions, may lack the necessary funding and procurement expertise to hire an external agent for data analysis. Additionally, the level of flexibility in agent agreements and contract requirements needs to be further clarified. We urge the CEC to consider providing a **pre-approved list of agents** or offering grant support for smaller jurisdictions that may struggle to navigate this process.

Need for Direct Access to Non-Masked Data for Local Governments

Local governments are at the forefront of implementing **Climate Action Plans (CAPs)** and require **granular, non-masked data** to develop tailored energy and emissions reduction strategies. While EDAP is a positive development, it does not fully resolve local governments' challenges in obtaining the level of data needed for climate planning. LGSEC encourages the Commission to explore pathways for providing direct but controlled access to **disaggregated, non-masked data** for local jurisdictions that has appropriate safeguards.

EDAP as a Step Forward, but Not a Complete Solution

While EDAP advances data accessibility, it is not a **comprehensive solution** to local governments' energy data needs. Existing limitations related to data privacy and aggregation thresholds mean that critical information to plan for and implement **building decarbonization, energy equity, and**



LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION

520 Capitol Mall, #440 Sacramento, CA 95814 ⊕ (916) 448-1198 ⊕ www.lgsec.org

program impact assessment may still be inaccessible. LGSEC encourages further exploration of policies that enable **responsible data-sharing mechanisms** between local jurisdictions and utilities.

Encouraging Regionalization and Shared Costs

LGSEC appreciates the Commission's recognition of regional collaboration opportunities. Local governments have successfully partnered under RENs to share costs and resources. We recommend that EDAP encourage **regionalized data access and cost-sharing models**, allowing multiple agencies to jointly procure an agent or utilize shared analytics resources.

Addressing Challenges for Smaller Agencies

Finally, LGSEC highlights that smaller jurisdictions may face significant hurdles in navigating the agent selection and data request process. We urge the Commission to consider mechanisms to **streamline participation** for resource-constrained agencies, such as pre-approved agent pools, technical assistance, and funding support.

Conclusion

LGSEC appreciates the opportunity to provide input on the EDAP framework and commends the Commission's leadership in increasing energy data access. We look forward to continued engagement on this issue and encourage further enhancements to ensure local governments have the necessary tools to meet their climate and energy goals.

Sincerely,
/s/ Steven Moss

Steven Moss
Partner, M.Cubed
Consultant, Local Government Sustainable Energy Coalition (LGSEC)
Steven@moss.net
+1 (415) 595-0120
296 Liberty Street
San Francisco, CA 94114