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Additional submitted attachment is included below.



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**VIA E-MAIL DOCKET@ENERGY.
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California Energy Commission
Dockets Office, MS-4
Docket No. 15-IEPR-05
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 15-IEPR-05: California's Existing Buildings Energy Efficiency Action Plan:
Comments of Pacific Gas and Electric Company

I. Introduction

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on Strategies 1.2 (Nonresidential Benchmarking and Disclosure) and 1.7 (Local Government Leadership) of the California Energy Commission's (CEC or Commission) Draft of California's Existing Buildings Energy Efficiency Action Plan (the Plan or Draft Action Plan).¹ PG&E has previously submitted comments on other areas of the Draft Action Plan to the CEC on April 21 and April 28.

Since the 1970s, PG&E has been a leader in energy efficiency and has worked closely with government, nonprofit, and private sector partners to design and implement programs and policies that allow Californians to do more with less energy. PG&E's energy efficiency portfolio includes a robust suite of rebates, incentives, services, and tools to provide every customer choices from a comprehensive set of tools and technologies through multiple delivery channels to help them reduce energy usage and save money. These programs and services are supported by utility staff, government partnerships, trade professionals, retailers, distributors, manufacturers, and other third-party providers. From 2010-2014, PG&E's energy efficiency programs helped customers avoid the release of more than 2,000,000 metric tons of carbon dioxide (CO₂), which is equal to the annual greenhouse gas emissions from nearly 460,000 passenger cars or more than 1,400,000 homes in PG&E's service territory.²

¹ Unless otherwise noted, all page references refer to:
California Energy Commission. (2015) Existing Buildings Draft Energy Efficiency Action Plan.
Sacramento, CA. Retrieved from <http://www.energy.ca.gov/ab758/>

² PG&E Customer Data Warehouse, 2010-2014 inclusive

More specifically, PG&E is dedicated to helping its utility customers meet California's energy efficiency goals in existing buildings and is already utilizing many of the approaches detailed in the Draft Action Plan to help customers make achievement of the goals a reality.

As noted below, PG&E encourages the CEC to make a finding related to the standard of aggregation, to facilitate implementation of Assembly Bill (AB) 1103 and the benchmarking provisions of AB 758.

II. Strategy 1.2 Nonresidential Benchmarking and Disclosure

The following sections provide PG&E's comments on specific benchmarking-related topics discussed during the Benchmarking section of the May 7, 2015 workshop.

A. PG&E Benchmarking Activities

PG&E is proud to be a national leader in facilitating building performance benchmarking, having helped customers benchmark over 12,000 properties using Web Services – 40 percent of all buildings benchmarked using Web Services in the nation. PG&E does not inquire or distinguish the purpose of benchmarking when requested by a building owner or manager. PG&E provides support for not only voluntary benchmarking but also multiple mandatory benchmarking programs including AB 1103, the City and County of San Francisco's Existing Commercial Buildings ordinance, and benchmarking of school energy usage under Proposition 39. The table below shows the number of properties benchmarked by PG&E since 2011.

Year	# Properties
2011	3,500
2012	3,536
2013	1,397
2014	3,320
YTD March 1, 2015	649
Total	12,402

In 2011, PG&E was among the first utilities to develop Web Services to speed and simplify benchmarking, by automatically transferring energy usage and billing data directly to ENERGY STAR ® Portfolio Manager. To facilitate these transactions, PG&E applies California privacy laws and California Public Utilities Commission (CPUC) decisions that require PG&E to obtain express and prior written or electronic consent for utility customers of record before releasing their energy usage data to a third party for a purpose other than utility service. Once authorized by the customer, PG&E automatically transfers up to three years of historical data and billing cycle data every month going forward.

PG&E continues to refine and improve our technical solutions, education, training and outreach to provide proactive support to customers as well as third party building owners and managers. These offerings include:

- All salesforce and account managers are trained on benchmarking and AB 1103 basics for education and outreach.
- Dedicated team of benchmarking specialists provides one-on-one phone and email support. In 2014, 400 hours of personalized assistance were allocated for building benchmarking.
- In-person training and education classes are professionally taught by Energy Efficiency Funding Group, Inc. at the Pacific Energy Center in San Francisco and in other locations in the PG&E territory. Attendance rates for “Benchmarking Your Commercial Building” and “Benchmarking as a Business” exceed 50 people per class and receive consistent 5-star reviews.
- PG&E.com corporate website hosts How-to-Guides and benchmarking resources.
- In 2014, PG&E launched an online learning management system to offer a convenient training alternative, especially useful for hard to reach small- and medium-size businesses. The training is modular, based on specific needs, and includes an AB 1103 focused module.
- In 2014, PG&E released an online, electronic data release authorization form to speed and simplify building owner and tenant/customer of record consent.

The Commercial Building Energy Saver is a web-based toolkit, especially tailored to small and medium commercial buildings, that identifies optimal energy saving retrofits and operational improvements. The toolkit will be a major technical improvement over current analytic tools by allowing users to:

- Identify no and low-cost energy efficiency operational improvements using smart meter data and actual weather data.
- Analyze retrofits for lighting, windows, and heating/ventilation/air conditioning (HVAC) systems based on building characteristics such as vintage, floor area, climate, energy price, etc.
- Evaluate more than 100 energy conservation measures, or combinations with the ability to prioritize based on cost, energy savings, CO2 emissions, etc.
- Results can compare pre- and post-retrofit building characteristics, energy performance, retrofit savings analysis, etc.
- Provide guidance on impacts of retrofits on indoor environmental quality.

Like many utilities, PG&E has been working with commercial building owners and business customers for the past thirty years to pursue and actively support energy efficiency improvements. PG&E not only supports building benchmarking programs, we also incorporate benchmarking in several of our newest and most innovative program designs like the Whole Building Pay-for-Performance model.

For the last seven years, PG&E has demonstrated its strong support of building performance benchmarking through its partnership with ENERGY STAR Portfolio Manager. PG&E is also working with twenty utilities across the country to support the U.S. Department of Energy's (DOE) Data Accelerator project. Following last year's DOE kick-off, PG&E began to work with the city of San Francisco and other California-based stakeholders to find practical ways to give building owners access to whole building energy data while at the same time preserving the confidentiality of customer-specific billing and energy usage data. PG&E will continue to work on best practices for providing benchmarking data to building owners while also adhering to California privacy laws and regulatory rulings, which are discussed in greater detail in Section D.

In addition to voluntary building energy benchmarking, PG&E supports and is complying with the CEC's current AB 1103 building energy usage benchmarking regulatory program. PG&E is working with relevant commercial building owners and landlords to report building energy usage information, provided that PG&E is able to upload the tenant energy usage information in a way that preserves customer confidentiality, as required by law. Implementation of AB 1103's requirements is currently the subject of a CEC rulemaking, and PG&E and parties have filed initial comments on the draft regulation.³

B. Data Aggregation

A commonality among all of the programs presented during the panel was the need for aggregation of. During the workshop, a request was made for specific information regarding the data at a sufficient level aggregation threshold. PG&E provides below some information and context that may be helpful in informing the discussion, while protecting consumer privacy.

During the workshop, some parties noted that Chicago's benchmarking program required a minimum of five tenants to protect confidentiality; where there were four or fewer tenants, customer consent was required. Others suggested three tenants was sufficient; however, no jurisdiction was identified that used three as the aggregation level, nor was any statistical research provided to support this or any other aggregation number as the appropriate aggregation level. In fact, in Chicago's benchmarking program, no aggregation is legally required because Chicago's benchmarking ordinance requires tenants to directly disclose their energy usage to their landlord without any privacy protection.⁴ As PG&E has noted previously, California privacy laws and policies provide significant protection to consumers' privacy, including requiring that building benchmarking data under AB 1103 only be provided if the confidentiality

³ http://www.energy.ca.gov/ab1103/documents/2015-02-20_workshop/comments/Pacific_Gas_and_Electric_Company-Valerie_Winn_Comments_on_AB_1103_03-06-15_TN-75373.pdf

⁴ Chicago Municipal Ordinance Title 18, Ch.18-14-101.4 "Within 30 days of a request by the building owner, each tenant of a unit in a covered building shall provide all information that cannot otherwise be acquired by the building owner to comply with the requirements of this chapter."

of the customer is preserved.⁵ Providing an appropriate, statistically-supported data aggregation minimum for customer confidentiality gives clear direction that would allow utilities to safely provide data in an agreed upon and secure level of customer privacy in compliance with the Legislature's direction in AB 1103.

The CPUC data decision establishes a 15 customer aggregation standard for protecting the privacy of non-residential customers, and a 100 customer aggregation standard for protecting the privacy of residential customers.⁶ AB 1103 allows the CEC to set a separate privacy aggregation standard for benchmarking based on factual evidence, but mandates that utilities preserve the confidentiality of the customer/tenant data that is uploaded for benchmarking under the law. PG&E encourages the CEC to make a statistically-supported finding related to the standard of aggregation required by AB 1103 to preserve customer privacy and to facilitate implementation of AB1103 and AB 758.

C. DOE Data Accelerator

PG&E joined the Better Buildings Data Accelerator Partnership in 2014. The Partnership, coordinated by the U.S. DOE, is a working group to develop solutions to challenges that come with providing energy data. Participation in the program is voluntary. On April 16, 2015, the U.S. DOE sent a letter to PG&E, extending its thanks to PG&E for its continued commitment to this groundbreaking initiative.⁷

As a Data Accelerator Partner and per the DOE's literature, PG&E has committed to:

- Engage with local stakeholders to outline and refine best practices and approaches for access to energy data in support of whole-building benchmarking (within 6 months)
- Work with DOE and other Accelerator Partners to identify one or more approaches for whole-building data aggregation that could be piloted in PG&E territory (within 12 months)
- Implement the pilot to make whole-building data available for at least 20 percent of multifamily and/or commercial buildings in the local community (within 24 months)
- Share results and lessons learned with DOE and other Accelerator Partners as approaches are implemented, such as materials developed for building owners in the local community on how to access energy data from their utility. (Ongoing)

⁵ Public Resources Code Sec.25402.10(b); see also California Attorney General Kamala Harris, <https://oag.ca.gov/privacy> (Californians have a constitutionally guaranteed right to privacy, and protecting their privacy rights is one of Attorney General Kamala D. Harris's top priorities. In the 21st century, we share and store our most sensitive personal information on phones, computers and even in "the cloud." Today more than ever, a strong privacy program is essential to the safety and welfare of the people of California and to our economy.)

⁶ CPUC Decision No. 14-05-016, Findings of Fact 16 and 17, pp. 139- 140, May 14, 2014.

⁷ Enclosure 1 contains a copy of the April 16, 2015 letter.

PG&E has made significant progress on the first two items, and is examining options to meet the last two. Over the course of 2014, PG&E held regular strategy and progress update meetings with other California investor-owned utilities (IOUs) as well as the Cities of Chula Vista, San Diego, San Francisco, Santa Monica, the Los Angeles Department of Water and Energy, Building Owners and Managers Association (BOMA) San Diego, BOMA Los Angeles, Kilroy Realty, and the U.S. Green Building Council (USGBC). The most promising solutions explored in these discussions were Green Leases, Data Anonymization, and Data Aggregation.

A green lease, which can help share the costs of energy efficiency projects between owner and tenant, was identified by the Data Accelerator group as one way to help combat the challenges inherent in data sharing. PG&E is working with stakeholders from the real estate industry to provide education about the possible benefits of this type of agreement. PG&E's Energy Training Centers offer and have helped develop a number of trainings specifically on the financing of energy efficiency projects, including materials on split incentives.⁸ Financing options can also help to overcome these hurdles. For instance, the On-Bill Financing (OBF) program offers 0 percent interest loans between \$5,000 and \$100,000, with up to five years to repay. Loan terms and monthly payment amounts are determined based on estimated monthly savings from the project. This year, the IOUs and California Alternative Energy and Advanced Transportation Financing Authority (CAEATFA) will launch the On-Bill Repayment (OBR) pilot programs, which will allow a customer to invest in energy efficiency, demand response, and solar measures and to repay such loans on the customer's utility bill. The loans will be transferable to subsequent building occupants with their consent and that of the participating financial institutions.

With regard to data anonymization, the President's Council of Advisors on Science and Technology (PCAST) has made the following finding regarding the availability of aggregation and anonymization techniques to protect the privacy of data:

Anonymization of a data record might seem easy to implement. Unfortunately, it is increasingly easy to defeat anonymization by the very techniques that are being developed for many legitimate applications of big data. In general, as the size and diversity of available data grows, the likelihood of being able to re-identify individuals (that is, re-associate their records with their names) grows substantially. ... Anonymization remains somewhat useful as an added safeguard, but it is not robust against near-term future reidentification methods. PCAST does not see it as being a useful basis for policy.²

⁸ The "split incentive" issue between the landlord, who pays for building upgrades, and the tenant, who benefits from the upgrades, is well known and documented as an energy efficiency barrier.

² "Report to the President: Big Data and Privacy: A Technological Perspective," President's Council of Advisors on Science and Technology, May, 2014, pp. 38- 39.

Without clear direction on the sufficient level of aggregation to secure customer data privacy, no design solution has yet been adopted for piloting through the Data Accelerator Program. See the section above for a detailed discussion of aggregation.

D. California's Privacy-related Statutes

California's legal culture promotes customer privacy. According to the State Attorney General's website, "Californians have a constitutionally guaranteed right to privacy, and protecting their privacy rights is one of Attorney General Kamala D. Harris's top priorities.¹⁰" In particular, California Civil Code Sections 1798¹¹ details the state's stance on privacy protection issues.

California's framework for customer privacy includes a preference for consumer participation and notification of the various uses of specific customer data, consistent with the Fair Information Practices Principles (FIPPs) endorsed by federal privacy agencies such as the Federal Trade Commission and Department of Homeland Security. The FIPPs are principles by which organizations apply safeguards in their collection and use of Personally Identifiable Information (PII)¹², and are consistent with California law and emerging national privacy and security policies. PG&E endorses the Federal Trade Commission's FIPPs for protecting customers' right to privacy, consistent with applicable customer privacy laws and regulations. Specific privacy-related statutes to which PG&E is held include CPUC Decisions 11-07-056¹³ and 12-08-045¹⁴ (CPUC Privacy Rules), Decision 14-05-016 (CPUC Energy Data Center Decision), and related CPUC rules, orders and decisions. These rules form the basis for PG&E's Customer Privacy Policy.¹⁵

E. Technology Challenges

A major technical hurdle to data aggregation is the difficulty in defining the physical relationship between buildings and meters. PG&E is currently evaluating the best way to establish the relationship. PG&E recently kicked-off a project with OPower that will use advanced analytics to create a building-to-meter relationship for all non-residential customers, allow customers to edit and revise the information as needed, and then upload the results into PG&E data systems. PG&E anticipates that the resulting robust database of non-residential buildings in its territory will be helpful in facilitating the goals of AB 758.

¹⁰ <http://oag.ca.gov/privacy>

¹¹ <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=civ&group=01001-02000&file=1798-1798.1>

¹² As per PG&E's Privacy Directive: Customer PII is any information that, when used alone or combined with other personal or identifying information, can be used to distinguish or derive the identity of an individual, family, or household who is or which includes a customer of PG&E. Such information is considered confidential and must be protected.

¹³ http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/140369.pdf

¹⁴ <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M026/K531/26531585.PDF>

¹⁵ See http://www.pge.com/tariffs/tm2/pdf/ELEC_RULES_27.pdf,
http://www.pge.com/tariffs/tm2/pdf/ELEC_RULES_9.pdf, and
http://www.pge.com/tariffs/tm2/pdf/GAS_RULES_27.pdf

F. Translating Benchmarking into Action

Benchmarking is one of many tools that PG&E provides to help customers understand their energy use and make decisions about energy usage. Armed with this information, customers and their PG&E representatives, third-party advisors, and building energy managers can carefully consider their energy efficiency options. PG&E's ongoing research into customer segments allows us to make continual updates to the way we target, market to, and interact with customers to meet their needs.

PG&E is committed to enabling customers to make investments in energy efficiency and other demand-side resources. Such investments provide benefits for far longer than the timeframe that many customers typically own or occupy buildings. Benchmarking can add value if it enables current and subsequent customers to realize the value of such investments. As noted in the Draft Action Plan, this effort will require coordination between the real estate, investment/financial, and energy communities to support growing customer demand.

PG&E has a number of tools available for customers to save energy with varying levels of investments. For example, PG&E offers no-cost online audits through its My Energy portal that include a range of recommendations to improve the efficiency of residential or commercial customer facilities. For those customers who are interested in pursuing deeper upgrades, there are a number of energy efficiency rebate and incentive programs for individual equipment replacement or full-scale projects with simple to more complex scopes.

PG&E offers incentive programs to commercial customers specifically for new construction, retrofits, and optimizing system operations. In addition, PG&E works with property management firms to help educate the industry on how to prioritize and install energy efficient projects amongst a portfolio of buildings. This helps property owners and decision-makers understand the economic and qualitative benefits of creating more efficient spaces and provides actionable ways to move forward with projects in the most inefficient buildings.

PG&E provides a wide array of incentives, tools, and services for its 5.3 million single family and multi-family customers. Though most of our programs are designed to benefit property owners when they are making decisions about their homes, PG&E has developed various targeted programs to ensure tenants are able to benefit from energy efficiency offerings. These programs include the Moderate Income Direct Install (MIDI), the Multifamily HVAC Maintenance, and the Mobile Home Direct Install programs. These programs help qualified households conserve energy and reduce their energy bills by replacing old inefficient equipment with new energy efficient equipment, or by making adjustments to existing equipment that improves efficiency. Additionally, PG&E continues to evaluate how it can add new residential offerings to its energy efficiency portfolio to address the split incentive issue and leverage industry leaders to apply best practices.

There are security and privacy safeguards in place in PG&E's current process. First, customers must authorize the third party for them to receive customer data. PG&E strongly recommends that customers investigate how the companies that they choose to do business with will manage and protect their data. Additionally, the CPUC maintains a list of companies who are not eligible to receive authorized customer data. The CPUC reviews reports of misuse of customer data and makes final determinations as to whether terms of the Tariff and/or Customer Data Privacy and Protection Rules have been violated. The Commission has the authority to order utilities to immediately revoke access and terminate registration of companies or individuals that are in violation and bar them from future participation.

PG&E also ensures that data transferred via PG&E's Share My Data tool are secure. Share My Data follows the Green Button Connect My Data implementation agreements. There is no exchange of identity information between PG&E and the third party, and Share My Data also employs Transport Layer Security (TLS) 1.2, a protocol that ensures privacy. TLS ensures that no third party may eavesdrop or tamper with any message.

Several presenters proposed best-practice solutions around maximizing the effectiveness of the benchmarking process, such as beginning with a subset of buildings, exploring ways to incorporate water savings, and providing online access to customer release forms. PG&E is always actively looking for ways to implement best practices, and would welcome a working group specific to California stakeholders, which could allow sharing and exploration of the best ways to meet state goals, including those in the AB 758 Draft Action Plan, within the existing regulatory and legal framework in the state.

III. Strategy 1.7 Local Government Leadership

PG&E supports numerous local government action and community-based campaigns in addition to our long-standing local government partnership programs. Our efforts include:

- a) **Green Communities Data Portal:** The Green Communities Data Portal allows local or municipal governments within PG&E's service territory to request and download data usage information about their communities to support greenhouse gas inventories and climate action planning. In addition to providing raw data, the Green Communities reports use Tableau software to provide insights to communities about their municipal, residential, and non-residential energy use, energy efficiency participation, and renewable energy installations. Furthermore, as a result of local government projects supported by the American Recovery and Reinvestment Act (ARRA), PG&E created a set of advanced data reports to give municipal governments in Berkeley and Fresno more insight into their community's energy consumption. Green Communities data reports are available for 100 percent of local governments in PG&E's territory and, as of 2014, over 60 percent of the approximately 250 local communities in PG&E's service area had downloaded the reports from the online Green Communities Portal.

- b) Financial and data support to the five Northern California contestants of the Georgetown University Energy Prize (GUEP)¹⁶;
- c) Support of the Statewide Energy Efficiency Collaborative (SEEC), consisting of the four IOUs and LGC, Institute for Local Government (ILG), and ICLEI - Local Governments for Sustainability to drive local government climate and energy planning and action; and,
- d) Support of the Cool California contestants

PG&E supports the Local Government Challenge (Challenge) as a way to help communities implement their Climate and Energy Action Plans. PG&E recommends that the Challenge leverage the SEEC, which provides tools, resources, networking opportunities, and recognition programs for local government energy efficiency and climate planning. SEEC can give local governments a comprehensive view of local energy efficiency efforts already underway. This can help participants in the Challenge learn from others and avoid duplication of effort. SEEC is creating a Resource Library to store and easily search, rate, and comment on local government resources for energy efficiency and climate planning.

During the workshop, there was a discussion on how local governments' unique abilities can be leveraged to maximize progress towards the goals of AB 758. These unique abilities include: code enforcement capabilities, point of sale benchmarking requirements, access to data, and community trust and recognition via established partnerships. However, local governments face challenges. Workshop participants stated that cities are often resource and time constrained, and many smaller cities, in particular, need financial assistance to achieve energy savings goals.

Because the availability of internal resources and staff capacity was identified as a challenge for many local government customers, PG&E suggests that, when considering grant awards for the Local Government Challenge, the CEC should prioritize projects that allow for public staff implementation where possible, rather than through the use of external consultant services. Using public staff will help build capacity within the jurisdiction.

Also discussed during the workshop, projects that are unsuitable for other funding programs either due to the nature of the project, the geography of the project, or the cost of the project should also receive priority. In particular, the Challenge should consider whether grant proposals could be funded by IOU Local Government Partnership (LGP) programs. In 2010, the CPUC approved Advice Letter 3099-G-A/2624-E-A¹⁷ authorizing the IOUs to provide LGPs with resources to implement the goals and strategies of the California Long-Term Energy Efficiency Strategic Plan local government chapter. The LGPs have since been able to choose from a "menu" of Strategic Plan activities for funding every cycle. Strategic Planning activities are

¹⁶ www.guep.org

¹⁷ Advice Letter 3099-G-A/2624-E-A, April 30, 2010:
http://www.pge.com/nots/rates/tariffs/tm2/pdf/GAS_3099-G-A.pdf

considered non-resource and are therefore not tied to the concepts of TRC and cost effectiveness discussed at the workshop. Menu items include climate action planning, reach codes, revolving loan funds, benchmarking policies, and more. It is also important to note that LGPs use non-Strategic Plan funding for activities like community energy efficiency campaigns, residential weatherization, and more. The IOUs are happy to provide a comprehensive list of LGP eligible activities.

PG&E proposes that the CEC consider the role of regional versus local governments in a similar way as the California Strategic Growth Council (SGC) Sustainable Communities Planning Grants.¹⁸ Under this structure, the SGC allocated a certain percentage of grant funds to regional governments and a certain percentage to local governments, realizing that different types of land use planning and different regulatory authority resides at each level. This concept may provide greater program flexibility in selecting eligible project types.

The nexus between water and energy is important at the local level but is challenging because of the granular network of water agencies throughout the state. The planning task force for the Local Government Challenge should coordinate with other statewide efforts in the water arena to capitalize on existing efforts related to drought relief and to incorporate energy savings into those efforts where possible.

PG&E would welcome the opportunity to leverage its experience in the local government arena and further the goals of the Plan by being a participant in the planning task force for the Local Government Challenge Program, either through SEEC or as a stand-alone committee.

IV. CONCLUSION

PG&E thanks the CEC for the opportunity to review and provide comment on the Draft Action Plan. PG&E looks forward to continued collaboration with the CEC on this subject in the future.

Sincerely,

/s/

Valerie Winn

cc: D. Ismailyan by email (david.ismailyan@energy.ca.gov)

¹⁸ http://sgc.ca.gov/m_grants.php

Enclosure 1



Department of Energy
Washington, DC 20585

April 16, 2015

Mr. Garen Grigoryan
Expert Strategic Analyst
Pacific Gas & Electric Company
245 Market Street
Mail Code: N9R
San Francisco, California 94105

Dear Mr. Grigoryan:

Entering the final year of the U.S. Department of Energy's Better Buildings Energy Data Accelerator, I am extending my personal thanks to you and Pacific Gas & Electric Company for your continued commitment to this groundbreaking initiative.

As you know, the Energy Data Accelerator is working with leaders from cities and utility companies nationwide to overcome informational barriers to energy efficiency by implementing practices to transfer whole-building, aggregated energy consumption data from utilities to the owners of buildings. This solution – which is already offered to customers by several leading utilities – strengthens the ability of building owners to measure and reduce wasted energy, and supports the President's goal to make America's buildings 20% more energy efficient over the next decade and catalyze private sector investment in energy efficiency.

I understand that implementing this solution requires innovation and hard work by you and your colleagues. By seeing it through, you will set a national example for your utility peers and strengthen Pacific Gas & Electric Company's customer service and clean energy leadership in the communities you serve.

Please do not hesitate to contact my team if there are specific ways in which we can support Pacific Gas & Electric Company's achievement of the Energy Data Accelerator goals. Once again, on behalf of the U.S. Department of Energy and the Better Buildings Energy Data Accelerator team, thank you for your commitment and leadership, and we look forward to continuing to work with you and recognize your progress on this front.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen B. Hogan".

Kathleen B. Hogan
Deputy Assistant Secretary for Energy Efficiency
Energy Efficiency and Renewable Energy

cc: Barry Hooper, City of San Francisco
Andrew Burr, U.S. Department of Energy
Monisha Shah, National Renewable Energy Laboratory

