

## DOCKETED

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**San Diego Gas & Electric Company and Southern California Gas Company  
Responses to the November 10, 2015 “Scoping Workshop: Building Energy Use  
Benchmarking and Public Disclosure” Questions**

*Additional submitted attachment is included below.*



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**RE: Docket: 15-OIR-05.** San Diego Gas & Electric Company and Southern California Gas Company Responses to the November 10, 2015 “Scoping Workshop: Building Energy Use Benchmarking and Public Disclosure” Questions

San Diego Gas & Electric (SDG&E) and Southern California Gas Company (SCG) respectfully submit these responses to the questions raised during the Scoping Workshop: Building Energy Use Benchmarking and Public Disclosure held on November 10, 2015. The following comments are provided in response to the questions directed to the Utilities in the Scoping Workshop presentation:

**1. By when should all utilities be required to match buildings to meters?**

Response: SDG&E and SCG have not yet determined a detailed implementation plan here, but are aware of and plan to meet the statutory requirement to provide energy usage data to the owner, agent, or operator of a covered building on request by no later than January 1, 2017.

**2. By when should utilities implement data exchange services with Portfolio Manager?**

Response: SDG&E and SCG currently participate in data exchange services with Portfolio Manager thru the Web Services application; however the aggregation requirement will have to be implemented in 2016. Complete implementation will be no later than January 1, 2017.

**3. How should utilities confirm whether a data request is from a building owner?**

Response: SDG&E and SCG have several verification mechanisms.

- One option is self-verification thru Portfolio Manager’s Web Services, where a customer can input their account number, meter number and most recent bill amount for each account they want to include in the building’s benchmarking request in order to initiate energy use information downloads.
- The second option is the submittal of a completed Customer Information Sharing Request (CISR) form from all account holders of all the accounts numbers to be included in the energy use information downloads.
- Both utilities will look into the Lease authorizations and other pertinent documentation (to be defined) in order to verify building ownership for covered buildings that meet the aggregation thresholds.

**4. How should “utility account” be defined when multiple fuel types are under the same account?**

Response: SDG&E and SCG define “utility account” as a particular account number for a specific account holder. For the purposes of aggregation, the aggregation threshold will be validated using “account holder” as the definition for utility account. For example, a covered building has six (6) account numbers but all account numbers are under one account holder (single tenant). This scenario will be considered as a single utility account and would not need to meet the aggregation thresholds.

If a customer bill includes both gas and electric meters under the same account number, it will be defined as one (1) account number.

If a customer bill includes a separate account number for gas and electric meters, it will be defined as two (2) separate account numbers.

**5. How many covered buildings are in your service territory? (Please provide MF, mixed use and non-residential numbers separately.)**

Response: SDG&E and SCG currently define utility accounts as Residential, Commercial and Industrial. Since neither utility collects nor reports energy usage by whole buildings, the best available information is listed below based on information available from their CIS systems, including lot configuration codes (SCG) for connected units at the facility.

Utility Accounts	1 to 2		3 to 4		5 to 6		15 +	
Building Type	Res or Mixed	Non Res	Res or Mixed	Non Res	Res or Mixed	Non Res	Res or Mixed	Non Res
<b>SCG</b>								
Customer Counts (All Rates; active accts)	156,031	269	575,012	1,890	1,221,309	1,606	TBD	TBD
Separate dwellings per lot (Facility)	N/A	N/A	173,437	1,258	N/A	N/A		
Connected dwellings/unit (Facility)	3,793,077	315,348	626,940	3,061	1,336,408	2,716		
<b>SDG&amp;E</b>								
Customer Counts (All Rates; active accts)	Not covered	78,783	Not covered	2,827	21,494*	1,321	5 or more accounts	305

**6. What is your anticipated cost for fulfilling data requests (1) with Portfolio Manager Data Exchange Services, and (2) with manual upload to Portfolio Manager? Please provide details on how these costs were derived \* Only provide if not currently subscribed to Data Exchange Services.**

Response: Both utilities currently subscribe to Portfolio Manager’s Data Exchange Services (Web Services) and also offer manual uploads as an additional customer service when the customers’ accounts warrant it. Based on prior experience, we expect this next phase to have an incremental and significant cost in order to provide automated aggregated data to our customers per AB802. The utilities are in the early planning stages to determine a business case and business requirements in order to implement these changes, which make providing any cost estimates premature. Both utilities are also expecting to provide ongoing training, customer service support, and technology upgrades that will require funding on an ongoing basis.

In addition, SDG&E and SCG will be requesting the California Public Utilities Commission to provide

direction and approval for the treatment of these costs and its recovery as soon as possible.

**7. What aggregation protocols do you plan to use? Please provide technical specifications if developed**

Response: Both utilities will follow the aggregations thresholds as described in AB802, but further guidance from the CEC and the CPUC will be required in order to protect customer privacy while meeting the law. For example, clarification on the definition of active account, the 50,000 SqFt building size reporting requirement, and the single account consumption percentage limits when aggregating.

**8. What is your implementation plan for matching buildings to meters by January 1, 2017?**

Response: Both utilities are working with the other IOUs in defining the mapping of building to meters and are active participants of building to meter matching working group. We are also looking at third party providers for the development of this capability.

SDG&E and SCG appreciate your consideration of these responses.

Sincerely,

*Tamara Rasberry*