

DOCKETED

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Pacific Gas and Electric Company Comments on the Scoping Discussion for the Building Energy Use Disclosure Program (AB802)

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-OIR-05
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket 15-OIR-05: Pacific Gas and Electric Company Comments on the Building Energy Use Disclosure and Public Benchmarking Program Mandated under Assembly Bill 802

I. Introduction

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide comments on the California Energy Commission's (CEC, Commission, or Energy Commission) Building Energy Use Disclosure and Public Benchmarking Program (Benchmarking Program or Program), that was discussed at a CEC Workshop on November 10, 2015.¹

Assembly Bill 802 mandates the establishment of a new statewide building energy use benchmarking and public disclosure program.² AB 802 repeals and replaces Public Resources Code (PRC) Section 25402.10 to require utilities to provide customer-specific energy consumption data for covered buildings to the building owners upon request, and requires the Energy Commission to establish a building energy use benchmarking and public disclosure program for certain buildings.

PG&E has long been a supporter of building benchmarking initiatives and has worked consistently with local governments to support their programs. PG&E is proud to be a national leader in facilitating building performance benchmarking, having helped customers benchmark over 12,000 properties since 2011 – 40 percent of all buildings benchmarked using Portfolio Manager in the nation. PG&E supports the further expansion of the Benchmarking Program under AB 802 and is committed to working with the CEC and other state agencies to

¹ Workshop Page: <http://www.energy.ca.gov/benchmarking/documents/>

² Assembly Bill No. 802, Chapter 590:

http://www.energy.ca.gov/benchmarking/documents/AB_802_chapter_590.pdf

successfully implement the Program on a cost-effective basis consistent with protection of customer privacy and information security.

Below, we respond to the questions posed at the November 10 workshop. Two key points that are expressed throughout are:

- Providing information through the Benchmarking Program about existing energy efficiency (EE) program options offered by the utilities and other EE Program Administrators will help building owners obtain the benefits of benchmarking.
- PG&E is currently developing an internal implementation plan and a cost estimate for fulfilling the data requirements of the Benchmarking Program.

II. PG&E Response to November 10, 2015 Benchmarking Questions

PG&E appreciated the informational presentation put forth by the CEC at the Building Energy Use Benchmarking and Public Disclosure Scoping Workshop on November 10, 2015. In the Workshop Presentation,³ several specific questions were presented. PG&E responds to select questions as follows:

Utility Data Access

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

To comply with the requirements of AB802, utilities should have building-to-meter mapping in place by January 1, 2017, assuming timely approval of cost recovery by the California Public Utilities Commission.⁴ Before the official requirements begin, several months for testing and quality assurance may be needed to obtain feedback about users' response to the update in service. This testing period should be at the discretion of each individual utility.

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

As per AB802,⁵ utilities should have data exchange services implemented by January 1, 2017.

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

³ Workshop Presentation: http://docketpublic.energy.ca.gov/PublicDocuments/15-OIR-05/TN206598_20151112T114203_Presentation_AB802_Benchmarking_Scoping_Workshop_11_10_15.pdf

⁴ Assembly Bill No. 802, Chapter 590:

http://www.energy.ca.gov/benchmarking/documents/AB_802_chapter_590.pdf

⁵ *Ibid*

When a user signs PG&E's current Customer Information Standard Release (CISR) form, that user is asserting that he or she has the authorization to access the data requested. Therefore, for data obtained via customer release, the CISR authorization should suffice. The responsibility for verifying building ownership is not a utility function, and thus the utilities should not be held responsible in any way for ensuring accurate building ownership information.

Should additional authentication beyond the CISR be required, it may be reasonable for Portfolio Manager to authenticate the owners before submitting the request to the utility. However, this is not currently part of the Portfolio Manager process and therefore could take considerable time to implement. The CEC could also require some level of authentication from users when they attempt to submit building data in compliance with AB802. This requirement would serve as a "two-factor" authentication and will allow users to quickly identify cases where building data had been uploaded without their knowledge.

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

PG&E recommends using the same method by which Portfolio Manager currently defines "utility account," whereby electric and gas meters are set up separately. The users should request building aggregation for each commodity type they receive.

PG&E notes that the situation could arise in a building where the number of electric accounts is above the aggregation threshold but the number of gas accounts is not (or vice versa). The prevalence of this type of situation may vary by utility. PG&E recommends that benchmarking only be required when both the electric and gas accounts are above the threshold, and in a situation where the number of accounts of one fuel type falls below the aggregation threshold, tenant consent be obtained.

Tenant Involvement

5. How can tenant participation in the rulemaking process be encouraged?

The CEC should provide a website and other education and outreach materials for tenants and building owners. PG&E is happy to support such educational outreach material by directing customers to these resources.

6. How do building owners obtain operational characteristics from tenants? How can this process be improved?

No comment.

7. What should be the Energy Commission's role in helping building owners obtain tenant information for benchmarking?

See response to Question 5 above.

Tenant Involvement (Nonresidential, 1-2 Utility Accounts)

8. When a tenant chooses to provide data, what should the public disclosure obligation be for the building owner?

If authorization is provided by the tenant, there is no need to aggregate the data before it is uploaded to Portfolio Manager. Portfolio Manager will automatically aggregate the meters to provide the building's overall score, so for reporting purposes the building information will still show as aggregated. Any further disclosure should be subject to the control and prior express consent of the tenant.

9. When a tenant chooses not to provide data, what should the public disclosure obligation be for the building owner?

If the tenant chooses not to release data, there should be no disclosure required by the CEC. In such a situation, estimated data should also be allowed.

Disclosure to the Energy Commission and Public

10. What is the easiest way for a building owner to get the benefits of benchmarking?

Providing information through the Benchmarking Program about existing energy efficiency program options offered by the utilities and other EE Program Administrators will help building owners obtain the benefits of benchmarking.

11. Is annual disclosure to the Energy Commission appropriate?

The required disclosure interval should be reasonable and based on the usefulness of the data to building owners, tenants and other real estate stakeholders. Annual disclosure may not be reasonable, in that it is unclear how useful that information would be, given the time to complete deep energy efficiency retrofits. Reporting every three years may provide a more meaningful balance for those who must provide the data.

12. When should a building's benchmark first be publicly disclosed?

See response to Question 11 above.

13. Is monthly weather-adjusted energy use intensity appropriate for public disclosure?

Monthly weather-adjusted energy use intensity data is not appropriate for public disclosure until further experience under the Program is evaluated to determine the need for and benefits of this additional data.

14. What unique program elements would lead to higher rates of energy efficiency improvements and program compliance?

As mentioned in the response to Question 10, if the Benchmarking Program were able to provide owners with information about existing energy efficiency programs, participation could be improved. For example, owners with low scores should be provided information about energy efficiency audit options and retrofit programs to help them improve their scores. In addition, high scoring owners could be looked to as a resource for guidance on sharing best practices.

15. How should public disclosure of building benchmarks be used to drive real estate demand for energy efficient buildings?

No comment.

Please include in your comments: Utilities

1. How many covered buildings are in your service territory? (Please provide multi-family, mixed-use, and nonresidential numbers separately.)

PG&E notes that without a definition for what constitutes a building, and until the building-to-meter mapping project is completed, an accurate count is not possible. However, PG&E is providing preliminary estimates of the building inventory using “Premise Address” as follows:

	PG&E Territory-wide Building Inventory Estimates
Multifamily	Approximately 51,000
Non-residential	Approximately 373,000
Total	Approximately 424,000

2. 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.

PG&E is in the process of developing cost estimates for fulfilling the data request requirements outlined in AB802. This will include mapping of all the meters associated with a given building, along with the incremental updates necessary to PG&E’s systems and processes for delivering the aggregated building level usage data to building owners and their agents for building benchmarking efforts via Portfolio Manager. However, cost estimates are necessarily preliminary until the CEC’s implementing regulations are finalized.

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

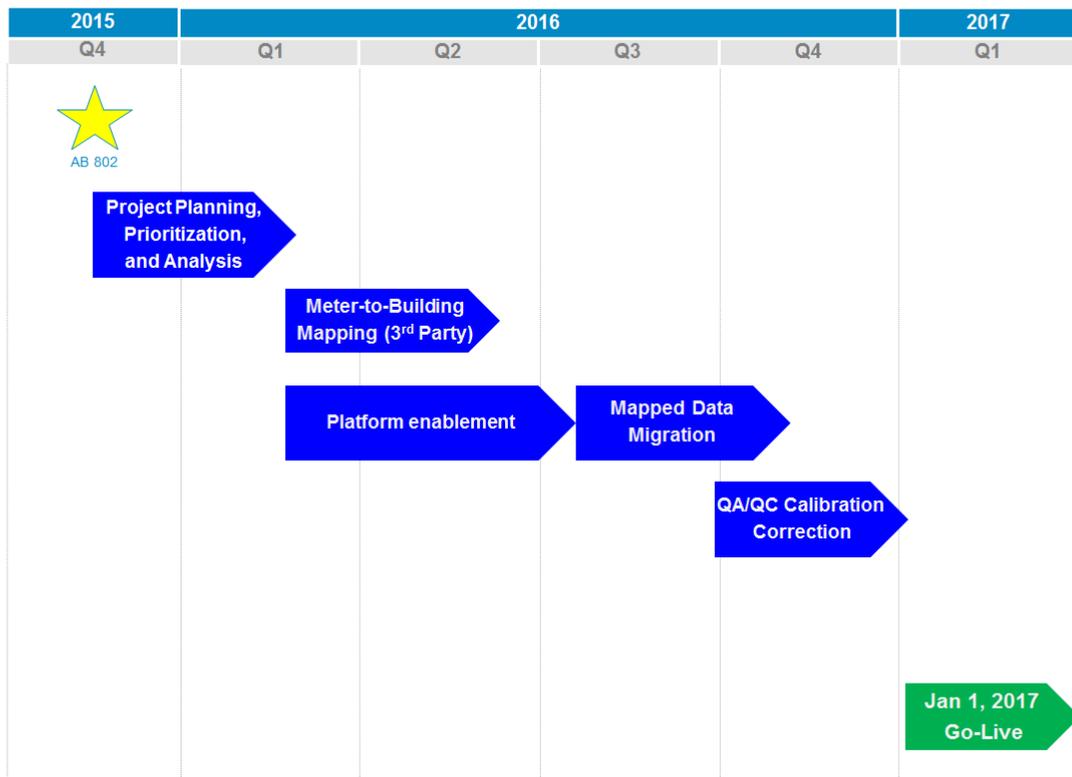
PG&E plans to use the aggregation protocols set forth in AB802, subject to appropriate customer privacy protections consistent with AB 802 and other laws.⁶

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

PG&E is working on developing a comprehensive implementation plan for the work associated with matching meters to buildings, as well as any system and process changes that will need to be enabled to make the building level usage data available by January 1, 2017. As discussed in Utility Data Access Question 1 above, PG&E hopes to build in several months for testing and quality assurance to obtain feedback about users’ responses to this new service offering before the official requirement begins. PG&E further anticipates leveraging the knowledge of the building owners, given their proximity to their properties, to calibrate the accuracy of the usage data being enabled. A draft of a preliminary milestone estimates is provided below:



AB802 Implementation Timeline



⁶ Assembly Bill No. 802, Chapter 590:
http://www.energy.ca.gov/benchmarking/documents/AB_802_chapter_590.pdf

III. Conclusion

PG&E thanks the CEC for the opportunity to review and provide comment on the Building Energy Use Disclosure and Public Benchmarking Program. PG&E looks forward to continued collaboration with the CEC and other state agencies on this subject in the future.

Sincerely,

/s/

Nathan Bengtsson

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