

DOCKETED

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Comments to Workshop

Additional submitted attachment is included below.

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eComment on 15-OIR-05
AB802 Comments

Benchmarking of buildings greater than 50,000 SF and public disclosure of the scores throughout the State will take California one step further in energy efficiency. I applaud the work of the CEC in working with the Statute in order to make this law the most effective. However, as an active Benchmarking firm with multiple properties exceeding 50,000 SF, I offer comments to bring this effort into a sensible workable program.

1. The timeline presented shows that the Regulations will start on 4/1/17 yet commercial reporting is not for another year. My query was answered in the Workshop with the need to promote and educate the building owners. That Outreach is essential and can begin this summer, by organizing information sheets for distribution in Chambers of Commerce, Commercial Realtors and Building Owner groups. The depth of a promotional program is beyond this comment, yet the need for the community of energy consultants working with utility and realtors to work together now and the Commercial Reporting moved up to 4/17.
2. The requirement that only buildings with three plus utility accounts and 50,000SF keeps many properties off the Disclosable list. I have multiple properties over 50,000 SF with fewer than three utility accounts. Several have one gas and one electric, yet consume a great deal of energy. The number of utility accounts should drop to one gas and one electric as many areas have different utility accounts for gas vs. electricity.
3. The Building Unique ID provides a complex task. Why not use existing Title APNs with the County name afterward? That data is available and does not require additional work or complication. The APN is listed for each property in Costar as well as in a Property Profile from Title.
4. Proof of Ownership is garnered from Title in a Property Profile. The owner's name and address is listed there. That combined with a House Account utility bill with the Owner's name confirms ownership.
5. These are the size buildings that have Data Centers. In order to benchmark a building that contains a Data Center according to the Portfolio Manager requirements, **one years' worth of data** from a SubMeter must be gathered. This requirement needs to be publicized as soon as possible in order to allow these buildings to be benchmarked effectively. 12 months of data needs to be obtained.