

## DOCKETED

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*Comment Received From: Bryan Cope*

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**Southern California Public Power Authority Comments on AB 802 Building Energy Use Data Access and Public Disclosure Program Staff Workshop**

*Additional submitted attachment is included below.*



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April 15, 2016 | Submitted Electronically

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 15-OIR-05  
1516 Ninth Street  
Sacramento, California 95814-5512

**RE: SCPPA Comments on AB 802 Energy Use Data Access and Public Disclosure Program Workshop –  
Docket No. 15-OIR-05**

The Southern California Public Power Authority (SCPPA) is pleased to submit these comments in support of the California Energy Commission's (CEC's) efforts to develop the Energy Use Data Access and Public Disclosure Program (Program), pursuant to Assembly Bill (AB) 802. SCPPA is a joint powers authority whose members include the cities of Anaheim, Azusa, Banning, Burbank, Cerritos, Colton, Glendale, Los Angeles, Pasadena, Riverside, and Vernon, and the Imperial Irrigation District. Each Member owns and operates a publicly-owned electric utility governed by a board of local officials. Our Members collectively serve nearly five million people, and more than 1 million commercial accounts in Southern California.

AB802 was signed into law to amend California's Public Resources Code with the intent to (paraphrased) "*create an energy usage benchmarking program for property owners of commercial buildings that are 50,000 square feet or larger that will allow owners to improve building management and make informed decisions to improve the efficiency of those buildings.*" This intention is consistent with the State's overarching goal to double the efficiency of existing buildings by the year 2030.

This legislation also places the responsibility for developing an implementation plan and enforcement duties on the CEC with certain expectations and requirements being placed on all of the states' electric utilities, both investor- and publicly-owned utilities, IOUs and POUs, respectively.

SCPPA appreciates and supports CEC staff's (Staff) efforts to outline the potential process that will be used to implement and comply with the law, as discussed during last month's workshop on March 25 at the CEC. In that workshop, SCPPA and other stakeholders asked many questions to clarify and fully understand the concepts that Staff presented for consideration. Below we highlight provisions that SCPPA supports as well as areas we recommend for further consideration. SCPPA has worked in collaboration with the Northern California Power Agency (NCPA) and the California Municipal Utilities Association (CMUA) to frame the issues that are critical to our Members' compliance with the Program. SCPPA endorses the comments filed by both NCPA and CMUA in this docket. In particular, SCPPA has been directly involved in drafting the proposed language for addition to the California Code of Regulations, presented as Attachment A and strongly supports the Commission's adoption of this language for Program implementation. We welcome an opportunity to meet with Staff to provide context where needed and discuss, in greater detail, the ideas and proposed solutions presented below.

## **Strengths of Staff Presentation**

Staff's overview and indications through the workshop included many key points that SCPPA supports, including:

1. the concept of creating a Building Identification numbering system for all covered buildings that will be unique across all utilities;
2. confirmation that utilities will not be responsible for verifying or tracking the square footage of covered buildings;
3. utilities may require proof of ownership and/or a release of energy usage data in certain buildings; and
4. recognition that the CEC needs to consider the inclusion or exclusion of energy usage for exterior applications or functions (e.g. parking lots, common areas, etc.)
5. building owners will be exempt from AB802 benchmarking if they comply with an approved benchmarking program developed under local ordinance.

These highlights indicate a mutual recognition of some key points and provide positive opportunities for stakeholders to build and improve on other outstanding issues that were discussed in the workshop. We appreciate Staff's thoughtful approach in developing these provisions.

## **Concerns with Proposed Program Implementation**

Recognizing the complexities of establishing an appropriate implementation plan for all stakeholders in this process, SCPPA remains focused on developing solutions that will address and resolve as many issues as possible for a majority of stakeholders. As noted above, SCPPA and NCPA have collaboratively developed proposed regulatory text to address a number of areas where SCPPA sees a need for revision or clarification. These include, but are not limited to:

1. Requiring utilities with 3-year average retail sales of 700 GWh/year to develop and maintain an automated data exchange protocol with the ENERGY STAR Portfolio Manager system by August 1, 2017. <sup>1</sup>
2. Providing the building owner with ability to specify a format of usage data delivery different than Portfolio Manager or the associated spreadsheet template. <sup>1</sup>
3. Staff also recommends that the utilities reconcile all mid-month reads/billing cycle data to conform to actual Calendar-month usage<sup>2</sup> which will create unnecessary administrative and analytical burdens.
4. The owner of any of the 393,000+ covered buildings referenced in Staff's presentation can request energy usage data from their service provider for benchmarking purposes – but Staff provided no definition or limit on how many times an owner may request this information from the utility provider. The Commission should allow utilities to offer benchmarking usage data to owners as often as they so choose – but should not require any utility to provide such data more than one time per calendar year.
5. There is no requirement for owners of non-disclosable buildings to benchmark their building, even if they request usage data – and this could create an undue and unnecessary data gathering and transfer burden on utilities.
6. While the owner of all disclosable buildings must report benchmarking data to the CEC, and the utility service provider must also deliver the same energy usage data to the CEC, Staff was unclear what format the utilities will

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<sup>1</sup> Bullet Nos. 1 & 2 are inconsistent with the language of the law that specifically states that utilities can choose to upload energy usage data directly to ENERGY STAR Portfolio Manager or use the spreadsheet template.

<sup>2</sup> Bullet Nos. 3-5 present administrative and analytical difficulties that are overly burdensome and onerous which will be costly to overcome for most, if not all, Utilities.

use to provide the data to the CEC. SCPPA recommends that the CEC only accept such benchmarking data in the standard, spreadsheet-based format for use in Portfolio Manager, to provide consistency for all stakeholders.

7. There is no discussion or consideration of the need for Owners to retain confidentiality of customer-specific energy usage data and not disclose such potentially sensitive information to 3<sup>rd</sup> parties or other agents unless tenants have agreed to such disclosure.
8. The justification to require utilities to list customer names as it relates to privacy needs to be further explored. Building owners should be able to determine whether they have the proper accounts based on the meter numbers.
9. The enforcement penalties did not include reference to any possible opportunities for utilities and/or building owners to resolve and/or rectify a reporting problem prior to the determination of a penalty, which should certainly be provided before penalties are imposed.

In summary, the proposed Regulations, presented in Attachment 1, address these important points by clearly defining the roles and responsibilities of the utilities and building owners throughout the Program's implementation, as stated in AB802 and often referenced in Staff's presentation of the intended concepts and ideas on the process details. While the proposed Regulations do include Staff's recommendation to include customer names in the data provided to building owners, SCPPA expresses concern that this requirement is overreaching and notes that it is not a requirement of AB 802. Regardless, SCPPA believes that the proposed Regulations present workable solutions that are fair, equitable and manageable for all parties to perform in good faith (and/or best) efforts to comply with the statute's implementation. We strongly encourage Staff to consider this document for use in developing the final language for implementation of the Energy Use Data Access and Public Disclosure Program.

In coordination with this effort, SCPPA has been working to develop a set of possible templates or outlines of some of the forms and agreements that may be useful for stakeholders to facilitate the energy use data acquisition process as part of the Program. Unfortunately, these documents are not in a form that is sufficient for stakeholders to review at this time. However, when complete and the Program development process has sufficiently progressed, SCPPA will readily share this information for all stakeholders' consideration. Ultimately, we believe these documents, and possibly others, will help stakeholders develop a streamlined process for all Program participants. However, **SCPPA does not recommend or suggest that the CEC create a set of forms and agreements that will be universally applicable or useful for all utilities.** As experienced in the Prop 39 California Clean Energy Jobs Act proceeding, developing a useful form for all utilities is lengthy and could delay implementation for many utilities. SCPPA suggests that Staff consider developing an ad hoc group of stakeholders who would be interested in working together on "the details" to help frame additional solutions to the Program implementation difficulties that may arise. Should Staff chose to pursue this path, SCPPA would be willing to participate in and support this effort.

### **Additional Recommendations for Consideration**

Though many solutions to our above-mentioned concerns are presented in the attached proposed draft Regulations, SCPPA has identified a few additional points for Staff's consideration during its initial implementation planning process. We offer that these would be most appropriately handled as part of Staff's implementation efforts outside of the specific regulations for this Program.

Specifically, and most important, **SCPPA strongly supports Staff's proposed development of a Building Identification Number system that would provide unique numbers across all utilities' respective service territories.** This should

be of primary focus and importance to the CEC. SCPPA also believes that Staff's stated intention for this system to be developed and maintained by the CEC is the correct and best course of action. However, prior to developing a Building Identification System, CEC Staff is urged revisit the data regarding the number of covered buildings in the state, as it appears much too low. That is, the data Staff presented from the CoStar database indicated that there are approximately 287,000 Commercial buildings in the state that are covered by the statute, and another 107,000 Multi-family covered buildings. Based on the records available to SCPPA, the Los Angeles Department of Water and Power alone has more than 1 million Commercial accounts. While it is highly likely that many accounts are contained within the same building, the relation of accounts per building would have to be perhaps 50 to 1 (or greater), in order for Los Angeles' share of the 287,000 building count to be close to the relative percentage of the Department's load to the statewide total. Therefore, **SCPPA encourages Staff to review and validate the real estate data research tools and protocols to verify the building counts are true and correct.**

Regardless, the sheer number of buildings will require a significant effort to **create a unique numbering protocol for all existing covered buildings – and future covered buildings.** One initial disaggregation of buildings could be done at the utility level. That is, to **develop utility-specific number systems**, the Commission could assign a 2 digit number to each of the 39 or 40 load-serving utilities in the state to serve as an "identifier" at the beginning of the Building Identification Number. If this assignment was made in alphabetical order, Alameda Municipal Power could be assigned 01, Anaheim Public Utilities would get 02, etc., until the City of Victorville was assigned number 39. From this, the CEC could then use the CoStar database and/or other resources to perform queries based on zip codes and develop lists of the existing covered buildings in each utility's service territory and assign sequential numbers to each of those buildings, starting with 01 and ending with the total number of buildings identified by CoStar in each utility service territory. That data query could be updated periodically (quarterly or annually by the CEC and any new buildings could be added sequentially to each utility's list, as appropriate. An example of this numbering system is presented as Attachment 2 for the CEC's review and consideration.<sup>3</sup>

In addition, SCPPA encourages the Commission to **develop guidelines or instructions for building owners to use when inputting data into the Portfolio Manager system** to help standardize the California Program-specific inputs. This will provide building owners and all stakeholders with the ability to compare the benchmarked building energy usage data. An example of a data input practice that can heavily impact building usage data comparisons/benchmarking would be the representation (inclusion or exclusion) of energy usage in areas that are exterior to the building shell (e.g., parking lot lighting or common areas).

Similarly, as part of the building owners' energy usage data request process and the utilities' associated review, approval and data transfer process, the CEC should **develop a clearly defined set of rules and practices for utilities to understand what constitutes an "account"** when they are assessing if a specific covered building is "disclosable" or not, and if a covered building with no residential units has less than 3 accounts. These are just 2 of the possible scenarios where the "number of accounts in a building" could determine the amount or the of energy usage data reporting that is required by all parties. One clear example of the many different situations where this could be an issue was shared at the workshop wherein the CEC was asked to decide if one person (or company, or tenant or owner) has 5 electric accounts in a single building – does that constitute 1 account or 5. When considering the permutations of multiple meters on the same account, or multiple premises owned by a fewer number of customers, the number of options and possible difficulties are significantly multiplied. Therefore, SCPPA strongly recommends that the CEC develop the appropriate, standard definitions of what is "an account", including possible examples of what an account "is not" (e.g., a meter, a fixed usage service ...)

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<sup>3</sup> One alternative to this approach could be the use of County-specific Assessor's Parcel Numbers (APN), as suggested by one stakeholder.

We thank you for your consideration of these comments and potential solutions in this matter. SCPPA and our Members stand ready to provide answers to any questions or clarification on these comments, as may be requested. We look forward to working with Staff and the Commission in finalizing the Energy Use Data Access and Public Disclosure Program implementation guidelines.

Respectfully submitted,



Tanya DeRivi  
Director of Government Affairs



Bryan Cope  
Director of Program Development

Attachments:

- (1) Draft Proposed Regulations for the Energy Use Data Access and Public Disclosure Program
- (2) Potential Exemplary Building Identification Numbering System Protocol

# **- ATTACHMENT 1 -**

## **Building Energy Use Data Access and Public Disclosure Program**

**California Code of Regulations**

**Title 20. Public Utilities and Energy**

**Division 2. State Energy Resources Conservation and Development Commission**

**Chapter 4. Energy Conservation**

**Article 9. Building Energy Use Data Access and Public Disclosure Program**

**Sections 1680-1685**

### **Section 1680. Purpose**

This article implements procedures, pursuant to Public Resources Code Section 25402.10, for providing building energy usage data to the building owner or owner's agent and for benchmarking and publicly disclosing energy usage information for certain buildings.

### **Section 1681. Definitions**

The following definitions apply to this article:

(a) "Benchmarking" means obtaining information on the energy use in an entire building for a specific period of time to enable that usage to be tracked or compared against other buildings.

(b) "Building" means any structure used or intended for supporting or sheltering any use or occupancy. Two or more buildings on the same parcel, campus, or site, that are served by one common energy meter without sub-metering, such that their energy use cannot be tracked individually, shall be considered one building.

(1) For the purposes of this program, "building" does not include exterior energy consumption.

(2) For a building with exterior energy consumption that is not separately metered, the building owner shall characterize the exterior energy consumption consistent with Portfolio Manager best practices.

(c) "Building Identification Number" means a number developed and maintained by the Energy Commission that is unique across all California utilities serving covered buildings.

(d) "Building Owner" means a person possessing the current title to a building, or an agent authorized to act on behalf of a person possessing title.

(e) "Covered Building" means either or both of the following:

(1) Any building receiving energy from a utility with no residential utility accounts.

(2) Any building receiving energy from a utility with five or more residential utility accounts of any one energy type, including buildings that may have additional non-residential utility accounts.

(f) “Disclosable Building” means either of the following covered buildings, when used for any occupancy type defined by Portfolio Manager:

(1) A covered building with 3 or more utility accounts of any one energy type, no residential utility accounts, and more than 50,000 square feet of gross floor area.

(2) A covered building with 17 or more utility accounts of any one energy type, residential or non-residential utility accounts, and more than 50,000 square feet of gross floor area.

(g) “Energy” means electricity, natural gas, steam, or fuel oil sold by a utility to a customer for end uses addressed by the Portfolio Manager system.

(h) “Energy Use Data or Energy Usage Data” means a record of kilowatt hours, therms, or any other measure of energy recognized by Portfolio Manager.

(i) “ENERGY STAR Portfolio Manager® or Portfolio Manager” means the tool developed and maintained by the United States Environmental Protection Agency to track and assess the energy performance of buildings.

(j) “Exterior Energy Consumption” means exterior lighting, equipment, machinery, electric vehicle supply equipment, or any other source of energy consumption on the premises of or supporting exterior services the building but not consumed by the building.

(k) “Utility” means an entity providing energy to a building. Energy aggregators that do not directly bill an individual customer are not considered utilities for this program.

(l) “Utility Account” means an agreement between a utility and its customer to provide energy to a pre-determined location.

## **Section 1682. Data Access**

(a) Prior to submitting a request to a utility for energy usage data, a building owner shall first do all of the following:

(1) Open a Portfolio Manager Account

(2) Enter the building into Portfolio Manager

(3) As needed, complete or update all required fields for the building within Portfolio Manager to generate a complete ENERGY STAR® Statement of Energy Performance, or ENERGY STAR® Scorecard if available for the building’s type.

(4) Request a building identification number from the Energy Commission.

(b) A utility shall develop a standard form for a building owner to use to request energy usage data for a covered building.

(1) A utility may require that a request be accompanied by information that verifies with reasonable certainty that the person submitting the request is the building owner or is authorized to act on behalf of the building owner.

(2) A utility may require a building owner to sign a non-disclosure agreement to protect building tenants from the inappropriate disclosure or sharing of their aggregated energy usage data. Nothing in the NDA shall prohibit the building owner from sharing the building information with a 3rd party for the purpose of making energy efficiency improvements to the building.

(3) If a utility receives a request for energy use data for a covered building that has no residential utility accounts and fewer than three utility accounts of each energy type serving the building, a utility may require written or electronic consent by the accountholder to release energy usage data to the building owner.

(A) A copy of an executed lease or supplemental agreement in which a customer consents to sharing his/her energy use data with the building owner shall be accepted by the utility as the accountholder having provided consent for the delivery of the accountholder's energy usage data to the building owner.

(B) A request shall not be considered valid until each accountholder provides written or electronic consent is conveyed to the utility for the delivery of the accountholder's energy usage data to the building owner.

(c) A utility shall have two weeks to determine if a request for energy usage data is valid.

(1) If a utility does not require building owner verification and/or a signed non-disclosure agreement and/or consent by the accountholder to release energy usage data to the building owner, then a request for energy usage data shall be considered valid upon receipt of the completed request form by the utility.

(2) If a utility does require building owner verification and/or a signed non-disclosure agreement and/or consent by the accountholder to release energy usage data to the building owner, a request for energy usage data shall be considered valid by the utility upon the utility's verification of the building owner per the standardized process developed by the utility and/or upon receipt of a signed non-disclosure agreement and/or written or electronic consent by the accountholder to release energy usage data to the building owner.

(3) If a utility determines that a request is not valid, then the utility shall respond to the requester and identify the reason(s) that the request is not valid.

(d) A utility shall, upon receipt of a valid request, provide aggregated energy usage data for the utility's accounts in the covered building to the building owner in at least one of the following formats:

(1) A utility may provide aggregated energy usage data in spreadsheet format that is compatible with being uploaded into Portfolio Manager.

(2) A utility may directly upload the aggregated energy usage data into the building owner's Portfolio Manager, upon consent of the building owner.

(e) For each energy type, the information provided by a utility to the building owner shall include the following:

(1) The Building Identification Number, as developed and maintained by the Energy Commission

(2) The meter number for each meter in the building.

(3) The name of each utility customer associated with the building.

(4) The aggregated energy usage data of all the utility's accounts in the building for the previous 12 calendar months. Due to utility billing cycles, this may include up to 14 months of billing data.

(f) Upon determining a request is valid, a utility shall have four weeks to provide energy usage data, as well as the information required by paragraph (e), to a building owner.

(1) A utility shall be required to process no more than one valid request for energy usage data per covered building per calendar year.

(2) For disclosable buildings, a utility shall also deliver this energy usage data and information to the Energy Commission.

(g) The building owner and utility shall not have any liability for any use or disclosure of aggregated energy usage data delivered as required by this article.

### **Section 1683. Public Disclosure**

(a) By April 15, 2017, and by April 15th annually thereafter, a building owner of a disclosable building shall request energy use data for the building from each utility for which there is at least one utility account in the building, consistent with Section 1682.

(b) The building owner of a disclosable building shall submit building data entered within Portfolio Manager to the Energy Commission per the schedule in Section 1684.

(c) The Energy Commission will compare data for disclosable buildings received from utilities per Section 1682(f)(2) with submissions provided by the building owner through Portfolio Manager to verify the information is correct. The Energy Commission may generate additional standardized metrics for disclosable buildings not deliverable through Portfolio Manager.

(d) A disclosable building meeting any of the following conditions is exempt from the reporting requirements of this program:

(1) The building has not yet had a complete calendar year of utility service.

(2) The building is scheduled to be demolished one year or less from the reporting date.

(3) The building is included in a local building energy use benchmarking program listed on the Energy Commission website.

(4) Other buildings or building types for which the Energy Commission determines the public disclosure of energy usage data for the building would compromise public safety or is otherwise protected by law.

### **Section 1684. Schedule of Implementation**

(a) Beginning January 1, 2016 utilities shall maintain records of the energy usage data of all buildings to which they provide service for at least the most recent 12 months.

(b) Upon the request and written authorization or secure electronic authorization, a utility shall provide a building owner with energy usage data, as specified in Section 1682, according to the following schedule:

(1) On and after January 1, 2017, for covered buildings.

(2) On April 15, 2017, and by April 15th annually thereafter, for disclosable buildings. A utility shall also provide the energy usage data to the Energy Commission.

(c) A building owner shall disclose benchmarking data to the Energy Commission on the following schedule:

(1) On June 15, 2018, and by June 15th annually thereafter, for disclosable buildings with no residential utility accounts.

(2) On June 15, 2019, and by June 15th annually thereafter, for all other disclosable buildings.

(d) By August 15, 2018, and by August 15th annually thereafter, the Energy Commission shall make available on a public website the standard information for all disclosable buildings.

### **Section 1685. Violations and Enforcement**

(a) The Energy Commission may enforce any of the following violations of Section 1683 against a building owner through the measures identified in Public Resources Code Section 25321:

- (1) Failure to complete the required submission on time per the schedule in Section 1684.
- (2) Providing partial or incomplete information.
- (3) Intentionally submitting incorrect data.

(b) The Energy Commission may enforce any of the following violations of Section 1682 against a utility through the measures identified in Public Resources Code Section 25321:

- (1) Failure to fulfill a valid request within four weeks.
- (2) Intentionally sharing incorrect data.

(c) Prior to levying an enforcement measure on either a building owner or a utility, the Energy Commission shall first notify the building owner or the utility of the violation and allow 30 days for the building owner or utility to correct the violation.

## ATTACHMENT 2

Affiliation	Utility ID	Utility	Exemplary Bldg. ID No.
NCPA	01	Alameda	01-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 01-X+1 ... 01-X+n
SCPPA	02	Anaheim	02-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 02-X+1 ... 02-X+n
SCPPA	03	Azusa	03-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 03-X+1 ... 03-X+n
SCPPA	04	Banning	04-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 04-X+1 ... 04-X+n
NCPA	05	Biggs	05-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 05-X+1 ... 05-X+n
SCPPA	06	Burbank	06-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 06-X+1 ... 06-X+n
SCPPA	07	Colton	07-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 07-X+1 ... 07-X+n
CMUA	08	Corona	08-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 08-X+1 ... 08-X+n
SCPPA	09	Glendale	09-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 09-X+1 ... 09-X+n
NCPA	10	Gridley	10-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 10-X+1 ... 10-X+n
NCPA	11	Healdsburg	11-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 11-X+1 ... 11-X+n
SCPPA	12	Imperial	12-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 12-X+1 ... 12-X+n
CMUA	13	Lassen	13-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 13-X+1 ... 13-X+n
NCPA	14	Lodi	14-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 14-X+1 ... 14-X+n
NCPA	15	Lompoc	15-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 15-X+1 ... 15-X+n
SCPPA	16	Los Angeles	16-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 16-X+1 ... 16-X+n
CMUA	17	Merced	17-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 17-X+1 ... 17-X+n
CMUA	18	Modesto	18-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 18-X+1 ... 18-X+n
CMUA	19	Moreno Valley	19-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 19-X+1 ... 19-X+n
CMUA	20	Needles	20-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 20-X+1 ... 20-X+n
IOU	21	Pacific Gas and Electric	21-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 21-X+1 ... 21-X+n
NCPA	22	Palo Alto	22-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 22-X+1 ... 22-X+n
SCPPA	23	Pasadena	23-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 23-X+1 ... 23-X+n
NCPA	24	Plumas Sierra	24-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 24-X+1 ... 24-X+n
NCPA	25	Redding	25-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 25-X+1 ... 25-X+n
SCPPA	26	Riverside	26-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 26-X+1 ... 26-X+n
NCPA	27	Roseville	27-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 27-X+1 ... 27-X+n
CMUA	28	Sacramento	28-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 28-X+1 ... 28-X+n
IOU	29	San Diego Gas and Electric	29-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 29-X+1 ... 29-X+n
CMUA	30	San Francisco	30-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 30-X+1 ... 30-X+n
NCPA	31	Santa Clara	31-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 31-X+1 ... 31-X+n
CMUA	32	Shasta Lake	32-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 32-X+1 ... 32-X+n
IOU	33	Southern California Edison	33-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 33-X+1 ... 33-X+n
CMUA	34	Trinity	34-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 34-X+1 ... 34-X+n
NCPA	35	Truckee Donner	35-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 35-X+1 ... 35-X+n
CMUA	36	Turlock	36-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 36-X+1 ... 36-X+n
CMUA	37	Ukiah	37-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 37-X+1 ... 37-X+n
SCPPA	38	Vernon	38-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 38-X+1 ... 38-X+n
CMUA	39	Victorville	39-001 thru 01-X, with X = max # of existing buildings. New/subsequent building IDs = 39-X+1 ... 39-X+n