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Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of:

Building Energy Use Disclosure Program

Docket No. 15-OIR-05

STAFF WORKSHOP

RE: Building Energy Use Data Access
and Public Disclosure Provisions of AB
802 (Williams, Chapter 590, Statutes of
2015)

**SOUTHERN CALIFORNIA EDISON COMPANY'S COMMENTS ON STAFF
WORKSHOP REGARDING INITIAL PROPOSAL TO IMPLEMENT THE BUILDING
ENERGY USE DATA ACCESS AND PUBLIC DISCLOSURE PROVISIONS OF AB 802**

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Dated: **April 15, 2016**

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Building Energy Use Disclosure Program

Docket No. 15-OIR-05

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ENERGY USE DATA ACCESS AND PUBLIC DISCLOSURE PROVISIONS OF AB 802**

I.

INTRODUCTION

Southern California Edison Company (SCE) is pleased to provide the following comments on the California Energy Commission’s (CEC’s) staff workshop regarding its Initial Proposal to Implement the Building Energy Use Data Access and Public Disclosure Provisions of California Assembly Bill (AB) 802, and supporting documentation, presented on March 25, 2016. SCE looks forward to further participation in the CEC’s AB 802 rulemaking process.

II.

THE CEC SHOULD ENSURE THAT UTILITIES ARE GIVEN THE NECESSARY FLEXIBILITY TO MEET THE REQUIREMENTS OF AB 802 IN THE MOST EFFICIENT MANNER

On page 19, the staff proposal states, “Utilities shall deliver the meter numbers, customer names, number of utility accounts, and building ID through the method of the building owner’s, owner’s agent’s, or operator’s choice.” However, SCE believes that each utility should be able to choose their method of delivery based upon their own level of resources and IT capabilities that maximizes efficiency while providing excellent customer service. For example, a utility with a large number of customers may decide to build a web-based interface to minimize manual processes and ensure a high level of quality assurance while smaller utilities with fewer customers may decide it is more efficient to utilize manual processes. In addition, each utility should also be able to choose the types of information provided to customers that would best facilitate the matching of meters to buildings based upon the design of their customer information systems while minimizing the amount of information and associated cost of providing that information. Data minimization is also akin to ensuring confidentiality is preserved. Therefore, SCE believes that using a less prescriptive method may be the preferred approach.

On page 20, the staff proposal states, “Utilities using automated data exchange shall deliver the energy use data directly into the building owner’s, owner’s agent, or operator’s ENERGY STAR Portfolio Manager account, unless otherwise specified by the building owner, owner’s agent, or operator.” SCE believes that the utilities should be able to choose the best method of delivery that maximizes efficiency, quality, data security, and customer service. In addition, Portfolio Manager allows users to download their energy usage data into a spreadsheet, so a building owner can utilize this capability to export their energy data for other uses as needed. It should be noted that SCE currently provides energy usage data to Portfolio Manager

via its Automated Benchmarking Web Services, which is our preferred method, however, we also provide energy usage data on a limited basis via spreadsheets if needed but only an exception basis, primarily for instances when technical issues are encountered. SCE has spent considerable resources and conducts training in the use of Portfolio Manager and its Automated Benchmarking Web Services: it would be impractical for SCE to provide data via spreadsheets for a large number of customers if customers made such requests for benchmarking purposes.

On page 21, the staff proposal states, “The energy delivered to the building by the utility by energy type for the 12 calendar months prior to the date of request, aggregated for each calendar month.” This statement implies that utilities must use interval energy usage data instead of monthly billing energy usage data. However, not all utilities may have deployed interval meters, and it could be more costly for utilities to utilize interval data in their benchmarking systems instead of utilizing monthly billing data. To address this potential issue, SCE currently provides monthly billing energy usage data via its Automated Benchmarking Web Services system to Portfolio Manager and provides up to 14-months’ worth of billing energy usage data. This method ensures that Portfolio Manager has at least the 12-months’ worth of energy usage data that is necessary to produce a score or energy use intensity for benchmarking purposes. Therefore, SCE suggests that the CEC use language that allows flexibility in how utilities implement their benchmarking system but ensure that utilities provide enough energy usage data so that Portfolio Manager can produce a score or energy use intensity.

On page 22, the staff proposal states that, “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.” SCE appreciates that this is an optional requirement because it would be costly to incorporate the necessary processes and procedure to ensure that the person making the request is the building owner, keeping in mind that the building owner may not actually be a utility customer if the entire building is occupied by tenants. However, SCE does and will take steps to help identify who is requesting the energy usage data for benchmarking purposes.

On pages 24-26, the staff proposal discusses two methods that utilities may use to confirm customer permissions when aggregation could not be utilized: (A) An executed lease or supplemental agreement (i.e. a “green lease”); and, (B) an opt-out provision whereby a utility would notify a customer (tenant) that the building owner has requested their energy usage and would then would provide it if they did not opt-out within 14 days. SCE supports option (A) and anticipates utilizing a simple, low-cost electronic process by which the building owner would attest to having a lease or supplemental agreement in place. In addition, building owners can easily begin incorporating the necessary agreements into their business practices before April 1, 2018 when commercial reporting is suggested to begin per the staff proposal. However, the opt-out provision does not provide a method to ensure that a customer (tenant) would receive the notification within 14 days, presumably via standard mail delivery, email, or phone. Also, notification via mail would add unnecessary additional cost. Therefore, SCE proposes that only option (A) be used.

On page 34, the staff proposal states, “The Energy Commission will use the data received from utilities to verify information reported by building owners, owner’s agents, or operators.” SCE suggests that it would be more efficient for the CEC to work with the Environmental Protection Agency to utilize Portfolio Manager to obtain the energy usage data at the same time that the building owner receives it from the utility. This would provide the CEC with the information necessary to ensure accurate building energy use disclosures while minimizing the development and cost associated with duplicative systems.

III.

CONCLUSION

SCE appreciates the opportunity to participate in the March 25, 2016 workshop and to provide comments on the CEC staff’s initial proposal. SCE looks forward to continuing to work with the CEC, the other utilities, and other interested stakeholders on the effort to implement the building energy use data access and public disclosure provisions of AB 802.

Respectfully submitted,

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