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Bright Power, Inc. Additional Comments on AB 802 Draft Regulations Initial Staff Proposal Jul 22 2016 Workshop

Additional submitted attachment is included below.

Comment Received From: Andrew McNamara on behalf of Bright Power, Inc.

Submitted on: 09/02/2016

Docket Number: 15-OIR-05

Bright Power, Inc. Comments on AB 802 Draft Regulations Initial Staff Proposal_Jul 22 2016 Workshop

Additional submitted attachment is included below

September 2nd, 2016

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket Number: 15-OIR-05

Bright Power, Inc. Comments on AB 802 Draft Regulations Initial Staff Proposal_Jul 22 2016 Workshop

Bright Power, Inc. respectfully submits these additional public comments in response to the Initial Staff Proposal presented at the California Energy Commission (Energy Commission) July 22, 2016 staff workshop on Building Energy Use Benchmarking and Public Disclosure.

These comments were prepared primarily by Jonathan Braman, Veronica Thomas, and Gregory Sherman of Bright Power

Respectfully,

Andrew McNamara
Vice President, Western Region

Why should Utility Companies provide lists of meters/accounts?

Utility companies are the best suited party involved in benchmarking to have access to an accurate list of accounts and meters at a given service address. It is too onerous for property staff to compile a list of meter ID's at a property – for a 400 unit apartment complex, there could be a gas and electric meter in each unit, potentially requiring access to every unit and handwritten documentation for 800 unique meters which would be very prone to typos when transcribed. Utility companies also know when meters have been changed at a site, and without having providers compile these lists, property staff could have to do this collection again every year to ensure that meter changes are not omitted.

We have heard utility companies argue *"But we don't have these on file! Our records are agnostic of location."* While this may be true in the databases that utility companies have set up now, clearly utilities do have service addresses for each account on file; service addresses are almost always on utility bills. Utility companies know where to send technicians to shut off a meter for non-payment or troubleshoot meter or other issues - they must have an address on file somewhere!

However, we agree that utilities may not always have service addresses for a building easily accessible, or know if multiple meter rooms / service addresses are in the same building. This is why we propose that the initial list of potential service addresses should come from the party who knows the building best: The Property Manager. This should be a collaborative back and forth effort and utility companies should maintain the records from previous years to better inform these lists in subsequent years.

We suggest this collaboration could involve the following steps:

1. Property Manager or representative provides a list of potential service addresses, along with an indication of what they consider to be the 'primary' service address of the building.
2. Utility company looks up all provided service addresses for matches and near matches (e.g., rd /road, w /west, e /east, etc.) and provides back a list of all meter ids and/or specific service address including unit numbers included at the provided potential service addresses.
3. Property Manager can confirm the number of expected meters matches their expectations, and can help identify any missing ones.
4. The utility company updates their records to associate all meters/accounts with the primary service address for the building. If available, associated with a building id, or if not available, the primary service address.
5. The utility provider provides aggregated data across all accounts at the building
    a. Preferably, broken into residential accounts, and non-residential (commercial) accounts (see section below titled *"Why should usage be broken into service classifications?")*
6. The next year, when requesting data, the Property Manager only has to provide the primary service address, or a house account.
7. The utility provider looks up the primary service address stored from the year before, and provides the same list of meters / specific service address associated with that primary service address.
    a. Including any newly installed meters or replacements to existing meters.
8. Property Manager confirms list with their expected unit counts and sends any updates / clarifications.
9. The utility provider provides aggregated data across all accounts at the building

Why should usage be broken into service classifications?

One solution to provide increased granularity of aggregate information while preserving tenant privacy is to show utility information by service classification. Several advantages of breaking usage into service class are listed below:

- In multifamily buildings the in-unit usage is very different than the common area / commercial usage. It follows different usage patterns (heavy evening load), as well as is subject to a much different set of incentives available. Tenant usage is often viewed as very hard to influence and change, so it's important to be able to see if in unit fixes have indeed had the payback that they should have.
- This also lets owners of several buildings, some of which are mixed use and some of which are not more accurately separate out just the in-unit consumption and the common area usage they pay for to compare usage between buildings
- The intention is to separate the usage into 'usage the owner can directly control' and 'usage that is subject to tenant actions'
- Several incentive programs have also mandated that in order to receive subsidies a building owner must also reduce in unit usage by a certain percent as well. Typically this is achieved through appliances and lighting, but it's vital to be able to track separately.
- We understand that there is an inherent imperfection in separating out units from other areas. Typically it is done on the service class level, by the utility company. There are cases where a model unit or a super's unit may be on a commercial rate class. We accept that these types of inconsistencies are inherent in the classification.

Why should benchmarking laws focus on properties instead of buildings?

In Bright Power's experience energy and water benchmarking is most useful when performed primarily at the property level, and we strongly suggest that AB 802's implementation be focused on properties. As used here, the term "property" refers to a single building or a collection of buildings in one location that is managed as a single entity. Properties with multiple buildings may include multiple addresses, but often have shared outdoor spaces, amenities, parking, staff, services and utilities (e.g. a single water meter, heating or domestic hot water systems). The term "building" refers to a discrete physical structure not connected (above ground) to another structure. Three key reasons for the suggested focus on properties rather than buildings are summarized below, and an option for addressing in the context of AB 802 is offered.

1) Real estate companies think in terms of properties, not buildings.

Owners and managers of real estate generally think at the level of properties. That is, internal records, accounting, staffing, financial information, decision-making is done at the *property*-level. Often, this means that basic building level information is not readily available - e.g. square footage, meters. This makes basic compliance (determining which buildings are covered, finding and compiling information at the building level) much more difficult and time consuming for owners if regulations are focused on buildings.

2) Decisions on significant energy saving actions are made at the property level

The key mechanism by which benchmarking can produce energy savings is by informing decisions - e.g. decisions to buy, sell, upgrade, or retrofit buildings and equipment. Benchmarking should thus be aligned with the level at which these major decisions are made - which is the property level. AB 802, like other benchmarking laws, applies to larger buildings – a sensible way to have a large impact given the key role of decision makers in saving energy. Convincing one owner of a large building to act should be much easier than convincing numerous single family home owners of an equivalent energy use. But the size of individual buildings doesn't impact the ability of a single decision maker to act on benchmarking information – it is the size of the *property* the individual manages. If a single decision maker can decide to upgrade a single mid-rise building of 50,000 square feet, or a complex with 30 buildings that total 50,000 square feet, the potential environmental impact is likely to be similar in both cases, and both should be equally covered by a benchmarking law intended to drive savings by prioritizing the largest opportunities.

Another example of property-level decision-making is a potential investor or purchaser of a new property who is interested in understanding energy and water performance; this person will be looking for property level information – because that's the level at which the transaction takes place.

Similarly, if an asset manager wants to make a case for investing in an energy upgrade, they will need to look at the available budget and potential savings impacts on the property's financials - individual buildings won't have their own budgets, operating income, etc.

Utility or gov't incentive programs will look for participating *properties*, not buildings, to make use of their available funds or technical assistance programs. Being able to search a database of disclosed energy information for candidate properties is much more useful than looking for individual buildings.

3) Shared systems often make building-level benchmarking impossible to do in a meaningful way

It is very common small buildings on a large property to share systems - central domestic hot water, heating or cooling systems, central water systems, landscape irrigation, shared amenities like parking lots, pools, community spaces and outdoor lighting. If benchmarking is done at a building level, there is a technical question of how to attribute the energy (or water) used by these shared systems. Attributing all of this energy to a single building, or dividing up proportionally doesn't add meaningful information to the benchmarking scores and may obscure real differences between buildings. Ignoring these shared systems may omit very large energy loads in the property. Benchmarking at the property level aligns with the way many utilities are consumed and produces meaningful metrics that can be compared across peer properties.

This is not to say, however, that building-level consumption analysis (e.g. finding out which building in a multi-building property is the worst performer, catching spikes) cannot be extremely useful for targeting specific fixes or informing day-to-day operational decisions. (This is especially true when focused on single fuels and based on rigorous analysis in relation to weather, occupancy and other patterns). Building level benchmarking (and monthly or real time tracking) can be a powerful tool, but is fundamentally different than annual or quarterly benchmarking to inform larger capital or real estate decisions. Building level analysis should support property-level benchmarking where available, but a broad policy like AB 802 will be much more effective at impacting large decisions, and providing useful information to the industry when focused on properties.

What's the solution?
Given that the law is already written with substantial language referring to "buildings," the best solution appears to be to amend the definition of “buildings” such that *multiple buildings with any shared energy or water using systems* are considered a single "building" under the law. The limits in the law should then clearly apply to the combined square footage and consumption of all buildings that share the system. “Shared systems” must be clearly defined to include not only shared domestic hot water, water, heating or cooling systems, but also parking lots, parking garages, club houses, leasing offices, fitness centers, pools, exterior lighting and other amenities that are related to the property, consume energy, and could be used by any occupant of the property.

Best practices around Aggregated Bill Utility Information (ABUI)

Our experience in benchmarking laws across the country summarized into best and worst practices.

- The next (3) sections of this PDF docket submission are separate documents combined into one PDF for purposes of this submission:
    1. Best Practices in Aggregated Data
    2. Aggregated Data Overview
    3. Example Aggregated Data Transmissions from Utility Companies

1. Best Practices in Aggregated Data

Summary: Aggregate Data should be complete, standardized, reasonable to request. Data should be as granular as possible without compromising privacy. Utilities should utilize their internal databases to do the work of checking for completeness and accuracy.

Issue	Summary	Best	Worst
Request Process	When issues come up, we need to ask questions! We need a person at the other end whose only job during the benchmarking request time period is to get the data out smoothly.	• Singular point of contact at utility for any problems (ConEd)	• Generic email for problems (PEPCO, National Grid) • No dedicated person to handle influx of work (PEPCO, National Grid) • Outside contractor with no access to utilities systems (PEPCO)
Request Process	There should be one kind of process for each utility. At mixed use residential/commercial buildings we shouldn't have to have 2 completely separate request processes.	• Same Process for all types – commercial and residential (ConEd)	• Commercial and Residential have different process and different requirements, event within a mixed use building (National Grid) • Residential aggregate has one release form, commercial requires every single tenants signature (Washington Gas)
Request Process	There are a lot of buildings - we don't want to fill out the same forms hundreds of times.	• Bulk request for multiple buildings (ConEd)	• Signed forms required for each building (PEPCO) • Must create online account for each property, then have property sign forms, then data added to login (sometimes not login requested) (ComEd)
Request Process	We typically work with the same buildings each year - if the process has been done once, there's no need to reinvent the wheel every year.	• Authorization valid for subsequent years (PEPCO)	• Must re-request as if it were new each year (National Grid)

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Issue	Summary	Best	Worst
Request Process	Requesting should be easy - an account number and authorization is reasonable. Spending hours in the basement handwriting meters is ridiculous when the utility company has this information on file.	• Give one account number, get full property data (ConEd)	• Property must identify all meters - even if there are hundreds and they are in the units! (PEPCO, Washington Gas)
Inclusiveness of Data	We want to be able to sanity check the results with our data if the number of accounts is vastly different than the number of units, we know we have a problem	• Indication of number of accounts included in report (ConEd)	• One number, no indication of which or how many account are included
Inclusiveness of Data	We should know that the data returned is the entire data that was requested. We spend hours upon hours for some utilities (PEPCO in particular) trying to confirm that the accounts are the complete usage at a building. These numbers are used later for things like EnergyStar certification, and we can't sign off on the data if we don't know that.	• All accounts at property (ConEd)	• Only tenant accounts - may be missing usage for another commercial tenant/owner (ComEd) • Only what you requested Meters/Accounts (PEPCO, Washington Gas, National Grid) • Specifically, they don't check to be sure the meter #s are valid, included mutiple times, or are at the address of the property
Data Format	This data is used in ways that make it important to separate out commercial from mixed use buildings. We need the service class and service address to do that.	• Service class and service address are included (ConEd)	• One number, no indication of what accounts are included or what type they are
Data Format	We process this data using automatic processes, which are reused year to year. There should be a specific format of data (as un-formatted as possible) and it should be constant year to year.	• Standardized Formatting in Excel (ConEd)	• Image file of excel data (PEPCO 2014) • Pdfs (National Grid)
Data Format	We like to model the usage to the weather, as well as subtract out the known accounts - but we need to know exactly when it was used to do that.	• Meter read dates (ConEd)	• Aggregated into one yearly number (PESG LI)
Data Format	Data should be in the utility's system for reference and rerun.	• Unique identifier for data - invoice numbers that can be re-run (ConEd)	• One time request that can't be rerun or looked up by someone else at utility (National Grid)

2. Aggregated Data Overview

Aggregated Data: What is it?
In most commercial and residential buildings, tenants pay utility companies directly. In order to report on the consumption of the entire building, building managers and owners, and the energy service companies they hire, need access an anonymous summary version of the energy and water consumption data.

This compilation of resources on aggregated utility data for the purposes of benchmarking regulations was put together by Veronica Thomas, Data Manager at Bright Power. She has worked on energy and water benchmarking projects for a variety of municipalities during her time at Bright Power and has seen the good, the bad, and the ugly of aggregated utility data.

While not perfect, the best aggregated data comes from Consolidated Edison in New York City. It's granular, consistent, and pretty easy to request. We work with an amazing contact there, Matthew Depierro (depierrom@coned.com). If utility companies have concerns about how to implement the requirements, perhaps he can offer some inside perspective. Every year he reaches out to companies that use the data and asks how to make the process smoother for everyone. Under his watch over the past few years, the process has gotten easier for us and for Consolidated Edison, the data has gotten more accurate, and as a result the City of New York can now achieve accurate benchmarking data submissions that are consistent year to year. Cities across the country are setting ambitious goals to improve the energy efficiency of buildings. New York City aims to reduce the city's building-based emissions 30 percent by 2025 – and measuring progress towards this starts with accurate data!

Contact us if you have any additional questions or want some clarification on the questions that this document tried to answer about aggregated data: What does it look like? Why do we want it? Why is it important? What else is it used for besides benchmarking?

Thanks for your time in considering how to make aggregated data the most impactful!

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The Various Uses of Aggregate Data

It Can Be Used For More Than Just Benchmarking Compliance!

Energy and water benchmarking regulations are becoming more common, which is great news for the overall efficiency of buildings across the United States – everyone knows the adage 'you can't manage what you don't measure'. Policy advocates, state and city governments, and utility companies are considering aggregate data requirements for purposes of benchmarking compliance. This is possibly why you are reading this. We believe aggregate data – if provided in the right way – could do a lot more than help report. If we think of the push behind benchmarking regulation as driving change through measurement then we want to make sure that the data provided is indeed useful enough to be used for incentive programs and audits that can help drive efficiency projects.

What else do we use aggregated data for?

- **Measurement and Verification of Retrofits** – Many incentive programs from utilities and government agencies require data collection before and after a retrofit or install to track the actual energy consumption of the property. Especially if tenants have moved since the initial collection of data, the cost involved in data requesting and processing can be prohibitive for the property and energy service companies, like Bright Power. Many programs (lighting and EnergyStar appliances) are part of specifically tenant spaces and it's very difficult to measure their effects and collect incentives that rely on results.
- **Analysis for audits of buildings** –to make accurate projections and recommendations, it is vital to know the entire consumption of the building, and where and how energy and water is used when doing an audit. Actual meter read dates – rather than for example a summary of the data by calendar months - and aggregated data summarized by service classes let us model the data accurately to the weather, and break out residential tenant spaces from the common area of a building and its commercial tenants.
- **EnergyStar Certification** – Environmental Protection Agency (EPA) EnergyStar Certification requires that the data submitted is verified as accurate. With some of the current data aggregate formats (PEPCO, Washington Gas) it's very difficult for certifying companies achieve a level of confidence about the accuracy of the data that it sufficient to label it "verified". This means that fewer buildings go for this certification, potentially missing out on other easy improvements that might need to be done to get the certification.
- **Better Buildings Challenge** – This Department of Energy (DOE) program aims to reduce energy usage by 20%, but unfortunately data submissions for this program often rely on a model of energy consumption created by scaling up tenant data. Data for a minimum of 5% of the total number of units is required; it would be better to use aggregated data instead to report the actual consumption data from the entire building.
- **Enterprise Green Communities** – Benchmarking and tracking of full utility data is required as part of the Enterprise Green Communities program. Aggregate data makes collecting the data easier ensures accurate reporting.

What else could we use aggregated data for if it were more detailed?

- **Demand Response** – If aggregated peak demand usage would be included in aggregated electricity consumption data, energy companies like Bright Power could help identify properties for which there are incentive programs and demand response makes sense. This helps utility companies smooth out their peak load, and makes incentive programs to reduce demand easier to manage.
- **Utility Allowances for Affordable Housing** – Affordable and Public Housing agencies have to keep track of accurate usage and cost data for the apartment types in their buildings as part of their reimbursement compensation. This costs significant overhead to keep updated signed release forms from every tenant and aggregate after collection. This cost means it's increasingly difficult to keep affordable housing affordable. Aggregated energy and water usage and cost data would help solve this problem.

3. Example Aggregated Data Transmissions from Utility Companies

ConsoidatedEdison of New York ABUI Format

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[address]	2 26	10/31/2011	12/2/2011	0.824445983
[address]	2 26	12/2/2011	1/3/2012	0.824445983
[address]	2 26	1/3/2012	2/2/2012	0.824445983
[address]	2 26	2/2/2012	3/5/2012	0.824445983
[address]	2 26	3/5/2012	4/3/2012	0.824445983
[address]	2 26	4/3/2012	5/2/2012	0.824445983
[address]	2 26	5/2/2012	6/1/2012	0.824445983

[address]	2 26	6/1/2012	7/2/2012	0.824445983
[address]	2 26	7/2/2012	8/1/2012	0.824445983
[address]	2 26	8/1/2012	8/30/2012	0.824445983
[address]	2 26	8/30/2012	10/1/2012	0.824445983
[address]	2 26	10/1/2012	10/30/2012	0.824445983
[address]	2 26	10/30/2012	12/3/2012	0.824445983
[address]	2 26	12/3/2012	1/2/2013	0.824445983
[address]	2 26	1/2/2013	2/1/2013	0.824445983
[address]	2 26	2/1/2013	3/5/2013	0.824445983
[address]	2 26	3/5/2013	4/3/2013	0.824445983
[address]	2 26	4/3/2013	5/2/2013	0.824445983
[address]	2 26	5/2/2013	6/3/2013	0.824445983
[address]	2 26	6/3/2013	7/2/2013	0.824445983
[address]	2 26	7/2/2013	8/1/2013	0.824445983
[address]	2 26	8/1/2013	8/30/2013	0.824445983
[address]	2 26	8/30/2013	10/1/2013	0.824445983
[address]	2 26	10/1/2013	10/30/2013	0.824445983
[address]	2 26	10/30/2013	12/3/2013	0.824445983
[address]	2 26	12/3/2013	1/2/2014	0.824445983
[address]	2 26	12/31/2013	2/3/2014	0.824445983
[address]	2 51	3/4/2011	4/4/2011	4080.824446
[address]	2 51	4/4/2011	5/3/2011	1520.824446
[address]	2 51	5/3/2011	6/2/2011	827.4911126
[address]	2 51	6/2/2011	7/1/2011	907.4911126
[address]	2 51	7/1/2011	8/2/2011	1254.157779
[address]	2 51	8/2/2011	8/31/2011	1174.157779
[address]	2 51	8/31/2011	9/30/2011	1174.157779
[address]	2 51	9/30/2011	10/31/2011	1334.157779
[address]	2 51	10/31/2011	12/2/2011	1147.491113
[address]	2 51	12/2/2011	1/3/2012	2587.491113
[address]	2 51	1/3/2012	2/2/2012	4427.491113
[address]	2 51	2/2/2012	3/5/2012	3467.491113
[address]	2 51	3/5/2012	4/3/2012	2427.491113
[address]	2 51	4/3/2012	5/2/2012	1360.824446
[address]	2 51	5/2/2012	6/1/2012	1227.491113
[address]	2 51	6/1/2012	7/2/2012	960.824446
[address]	2 51	7/2/2012	8/1/2012	2080.824446
[address]	2 51	8/1/2012	8/30/2012	1414.157779
[address]	2 51	8/30/2012	10/1/2012	1760.824446
[address]	2 51	10/1/2012	10/30/2012	1227.491113
[address]	2 51	10/30/2012	12/3/2012	3680.824446
[address]	2 51	12/3/2012	1/2/2013	6320.824446
[address]	2 51	1/2/2013	2/1/2013	6320.824446
[address]	2 51	2/1/2013	3/5/2013	10080.82445
[address]	2 51	3/5/2013	4/3/2013	6507.491113
[address]	2 51	4/3/2013	5/2/2013	3200.824446
[address]	2 51	5/2/2013	6/3/2013	1654.157779
[address]	2 51	6/3/2013	7/2/2013	2134.157779
[address]	2 51	7/2/2013	8/1/2013	1680.824446
[address]	2 51	8/1/2013	8/30/2013	1254.157779
[address]	2 51	8/30/2013	10/1/2013	1174.157779
[address]	2 51	10/1/2013	10/30/2013	774.1577793
[address]	2 51	10/30/2013	12/3/2013	2054.157779
[address]	2 51	12/3/2013	1/2/2014	1787.491113
[address]	2 51	12/31/2013	2/3/2014	6840.157779

ComEd - Chicago ABUI Format

Month Year	Total Monthly Usage (kWh)
Jan-13	56,582
Feb-13	206,842
Mar-13	203,821
Apr-13	216,475
May-13	278,322
Jun-13	279,244
Jul-13	363,261
Aug-13	331,186
Sep-13	355,454
Oct-13	285,759
Nov-13	255,763
Dec-13	345,688
Jan-14	357,873
Feb-14	325,196
Mar-14	278,474
Apr-14	239,116
May-14	323,625
Jun-14	349,450
Jul-14	394,963
Aug-14	447,953
Sep-14	332,937
Oct-14	267,300
Nov-14	321,434
Dec-14	367,022
Jan-15	360,513
Feb-15	341,929
Mar-15	293,400
Total	**8,179,582**

National Grid Boston ABUI Format
Property:
12345 Pinapple Lane
BOSTON, MA 21160

Bill Mon Year	Num Days	Therms Used	Gas Charge	Num Bills
Jan 2014	33	1,555	$2,064.50	1
Mar 2014	75	21,814	$29,791.84	1
Apr 2014	43	3,272	$4,920.37	3
May 2014	31	0	$109.80	1
Jun 2014	33	0	$116.88	1
Nov 2014	157	9,528	$10,127.05	1
Dec 2014	24	417	$560.86	1
	396	36,586	$47,691.30	9

End of Billing Detail.

nationalgrid

Summary of Gas Usage

Property:
[redacted]
BROOKLYN, NY 11236

	Bill Month	Days	Total Therms	Total Charge	# of Bills
1	Jan 2014	31	12,484	$3,936.26	1
2	Feb 2014	29	10,537	$3,484.76	1
3	Mar 2014	32	11,142	$3,383.71	1
4	Apr 2014	28	8,220	$2,587.63	1
5	May 2014	31	7,626	$2,645.17	1
6	Jun 2014	32	4,289	$1,820.16	1
7	Jul 2014	29	5,047	$1,797.86	1
8	Aug 2014	31	6,247	$2,011.73	1
9	Sep 2014	30	5,923	$1,909.98	1
10	Oct 2014	29	6,120	$2,081.57	1
11	Nov 2014	30	9,111	$3,105.39	1
12	Dec 2014	55	21,189	$6,352.36	2
	Totals:	**387**	**107,935**	**$35,116.58**	**13**

NSTAR Boston ABUI Format

Start Date	End Date	Usage	Cost	Estimated Value
1/1/2014	1/31/2014	97292		FALSE
2/1/2014	2/28/2014	124374		FALSE
3/1/2014	3/31/2014	145182		FALSE
4/1/2014	4/30/2014	113711		FALSE
5/1/2014	5/31/2014	118415		FALSE
6/1/2014	6/30/2014	147833		FALSE
7/1/2014	7/31/2014	192532		FALSE
8/1/2014	8/31/2014	196575		FALSE
9/1/2014	9/30/2014	207943		FALSE
10/1/2014	10/31/2014	167767		FALSE
11/1/2014	11/30/2014	153656		FALSE
12/1/2014	12/31/2014	169193		FALSE

PEOPLES GAS
NATURAL GAS DELIVERY

Building Aggregation Summary

Generated on: 5/21/2015 10:23:09AM

PREMISE_ADDRESS	PREMISE_ADDRESS_2	METER_NUM	EQUIP_SIZE_DESC
[redacted]	[redacted]	[redacted]	[redacted]

Meters: 1

	USAGE_QTY (CCF)
1/2014	1,843.06
2/2014	3,482.20
3/2014	3,559.51
4/2014	2,825.65
5/2014	1,308.63
6/2014	392.14
7/2014	436.96
8/2014	361.89
9/2014	385.42
10/2014	904.16
11/2014	2,681.12
12/2014	3,716.37

Washington Gas - DC - ABUI Format

START	END	TOTAL THERMS
12/1/2013	12/31/2013	204.2
1/1/2014	2/28/2014	26563.5
3/1/2014	3/31/2014	488
4/1/2014	7/31/2014	10204.2
8/1/2014	8/31/2014	20.1
9/1/2014	9/30/2014	25.7
10/1/2014	10/31/2014	21.4
11/1/2014	11/30/2014	27.3
12/1/2014	12/31/2014	50.7
1/1/2015	1/31/2015	42.5
2/1/2015	2/28/2015	41.9
3/1/2015	3/31/2015	64.9
4/1/2015	4/30/2015	66.1

[redacted]@pepco.com 3/26/14

to me

Good morning,

Below is the aggregated usage for [redacted]

[redacted]	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13
	27761	42530	53228	41610	38343	42929	38059	64690	49793	59276	51866	66295

Thank you,
[redacted]

PEPCO- A PHI Company
Key Account Support Team - South
[redacted]@pepco.com
[redacted] (phone)

PSEG LONG ISLAND

March 20, 2015

[redacted]
Bright Power
[redacted]@brightpower.com

Re: [redacted]

Dear Customer:

As you requested, the following is the 2014 information regarding Local Law 84 Benchmarking for the electric service at:

Address	city_state_zip	# of Accts	tot_bill_amt	tot_elec cons
[redacted]	FAR ROCKAWAY, NY 11691	306	$304,507.08	1,326,521
[redacted]	FAR ROCKAWAY, NY 11691	1	$547.57	1,984

acct_#	cust_name	Address	tot_bill amt	tot_elec cons
[redacted]	[redacted]	[redacted] FAR ROCKAWAY, NY 11691	$78,799.72	419,680
[redacted]	[redacted]	[redacted] FAR ROCKAWAY, NY 11691	$2	7118

Account number [redacted] was closed July 3, 2014, so the information provided above for this account is only through that date. If I can be of further assistance in this matter, please contact me directly by phone at [redacted] or by fax at [redacted]. I am available to assist you between 8:00 a.m. and 5:00 p.m., Tuesday through Friday.

Sincerely,

Ms. [redacted]
Customer Service Representative
Billing Department