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Prompts for Written Comments - SMUD

Additional submitted attachment is included below.

This is in response to the CEC questions posted 12/21/2018

POUs report EE program-level data under Section 1311, but Section 1353 requires meter-level data. Which data from the POUs are sufficient for CEC staff to estimate EE impacts on demand at the meter level? What is the most efficient and effective way for the Energy Commission to combine POUs' EE data with IOUs' EE data?

Question 1:

- a. Are the proposed fields in the *EnergyEfficiencyParticipation* table appropriate for evaluating meter-level impacts of EE participation on energy demand? If not, what changes do you propose?
- b. IOUs report EE participation data to the California Public Utility Commission's CEDARS database. Staff has proposed that IOUs might provide additional data necessary to link CEDARS data to meter-level energy consumption data under Section 1353, in lieu of reporting participation data directly to the Energy
- c. Commission. Is there an efficient way to join these datasets? For example, by IOUs reporting a mapping between CEDARS claim IDs and Section 1353 meter or premise IDs. If so, please describe.
- d. POUs report EE program-level data under Section 1311, but Section 1353 requires meter-level data. Which data from the POUs are sufficient for CEC staff to estimate EE impacts on demand at the meter level? What is the most efficient and effective way for the Energy Commission to combine POUs' EE data with IOUs' EE data?

EnergyEfficiencyParticipation ServiceAccountId EeMeasureCode PremiseId EeProgramCode StartDate EndDate ClaimDate

EnergyEfficiencyPrograms	EnergyEfficiencyMeasures
EeProgramCode	EeMeasureCode
EeProgramName	EeMeasureName
EeProgramDesc	EeMeasureDesc

SMUD Response: We can provide the data in the currently provided tables. We don't currently measure or map our EE program to a Meter ID or Service Point. It can be mapped to a Business Partner, Service Account, and Premise, which could be linked to meter(s) to get interval data set(s).

Question 2:

- a. During the workshop, staff suggested that a data flag indicating whether a bill is partial, in addition to the CCA and DA requirements above, would remove all ambiguity. Is this a reasonable solution?
- b. Please provide any other feedback on this proposal or alternate suggestions for resolving these billing data concerns.

SMUD Response: Not Applicable to SMUD currently.

Many rate schedules include options and modifiers (e.g. CARE). The Energy Commission's goal is to be able to identify the specific tariff that a customer is billed under, including such options and modifiers. Currently, the proposed source data schema assumes that the rate schedule code includes this information, but this is not always true. Some utilities have suggested providing a data flag for each option and modifier in the billing consumption tables, while others have suggested that this data belongs in a separate rate schedule table like the one currently proposed.

Question 3: Please provide any feedback or suggestions on how to structure and collect rate schedules in a way that captures options and modifiers. Ideally, a solution will be appropriate for all utilities. However, staff will consider suggestions that handle rate schedules differently for each utility if necessary.

SMUD Response: Energy Help and Life support rates are called out in our Rate Schedule with a suffix that can identify them as one, the other, or both (e.g. RT02_EL is our time of day rate, Energy Help, and Life). Energy help %/amount is based on income levels and are managed using with an operand/fact. For that information we can provide the operand/fact and levels and % per service account, but it will not fit in the currently proposed data table. Though not discussed to date, we have many other operands/facts that impact the customer bill. We suggest a separate table, but we can append to an existing table entry (RateScheduleCode) or add a new field(s).

RateSchedule

RateScheduleCode RateScheduleName

RateScheduleDesc

Unmetered consumption

The current source data schema proposes that utilities report unmetered consumption estimates in the *BillingConsumptionElec* table, leaving *Meterld* and any other non-relevant fields Null. Staff is concerned that this proposal will not be able to identify a geographic region for unmetered consumption if it is not associated with a *Premiseld*.

Question 4: An alternate solution is for utilities to report unmetered consumption estimates in a separate table that includes limited geographic fields (e.g. city, state, zip) and allows the utility to report whichever are known.

- a. Is this alternate solution the most reasonable approach for reporting unmetered consumption?
- b. Please provide any additional feedback or suggestions on how to structure and collect unmetered consumption.

SMUD Response: Use a separate table with Service account id. Rate, and rate description will provide details on estimated energy consumption (e.g. INC189_1 = 01 Incandescent 189 w). We can provide the estimated usage that is used for billing, it can be combined with metered data if need be based on service account.

Submeters

Staff defines a submeter as any meter which is behind another physical or virtual meter, and is aware that energy accounting errors, such as double counting, can occur in these situations. Staff would like input on collecting submeter relationships and avoiding accounting errors. **Question 5:**

- a. Please propose changes to the proposed source data schema for collecting and tracking submeter relationships.
- b. Are there any other potential accounting errors staff should be aware of regarding submeters? If so, are any other changes required to avoid these errors?

BillingChargesElec ServiceAccountId PeriodStart TimeZoneStart PeriodEnd TimeZoneEnd BillCharge BillingConsumptionElec MeterId ServiceAccountId PremiseId ServicePointId PeriodStart TimeZoneStart PeriodEnd TimeZoneEnd KwhNet IsKwhNetEstimated IsKwhNetUnmetered NaicsCode RateScheduleCode CommunityChoiceAggCode DirectAccessCode

IntervalConsumptionElec MeterId ServiceAccountId PremiseId ServicePointId IntervalEndTime IntervalLength TimeZone KwhDelivered IsKwhDeliveredEstimated KwhReturned IsKwhReturnedEstimated

PremiseElec PremiseId FullAddress StreetNumber HouseFractionNumber StreetPrefix StreetName StreetSuffix Building Unit City State Zip Zip4

SMUD Response:

SMUD has previously stated the following:

- We don't bill at each Meter ID level
- We may have multiple meters at a premise, or service point.
- Collective Bills are aggregated at the Service Account level, and can have many premises, service point, meters, etc.
- We also can have more than one service point per Service account.
- We use a Virtual (Recorder") device as way of aggregating any sub (actual physical) meters when we bill.
- The recorder meters will show an aggregate consumption and will be billed.
- The Sub meters would also show consumption but will not be billed.

We could provide a flag for billable, no-billable meters, but we would propose a separate table to deal with the relationships. We believe this would be easier to maintain and for the CEC to analyze the data sets.

General Topics

Question 6: Please provide any additional feedback or suggestions on the proposed source data schema, including which data fields should be reported and how they should be structured.

SMUD Response: See questions 3, 4, and 5 above.

Question 7: Please provide any additional feedback or suggestions on the proposed ETL methods and transformation rules. Please attach a list of specific ETL rules that you recommend.

SMUD Response: We have no specific feedback based on the documents and discussions we have had to date and realize that this area will evolve over time. We have several related Internal Policy and Management Procedures that maybe involved when we start to develop the details in this area, and will need to adhere to, or possibly amended them in the future.

Question 8: Do you have any other feedback or suggestions which were not addressed in the prompts above?

SMUD Response: Interval Data

- SMUD Interval Data currently resides in a downstream 3rd Party system solution. We see the value of making that information readily available for both SMUD's internal use, as well as these CEC efforts. We have efforts underway that we hope will coincide with these requirements, but we may seek a delay in providing interval data to the CEC until we can prove the integrity of the data targeted to be available in Q2 2019 timeframe.
- SMUD uses a normalized data structure. We will be challenged to provide the data requested in a less normalized structure that will be useful to the commission but believe can meet the requirements as we understand them today. We also recognize that these requirements are likely to evolve over time and are willing to work with the commission as they do in the future.

Respectfully Submitted,

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