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**SCE Comments on CEC Disaggregated Demand Data Cleaning
Workshop_FNL**

Please see attached.

Additional submitted attachment is included below.

January 7, 2019

California Energy Commission
Docket Office, MS-4
Re: Docket No. 18-MISC-05
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission Docket No. 18-MISC-05: Disaggregated Demand Data Cleaning Workshop

Dear Commissioners:

On December 11, 2018, the California Energy Commission (CEC) held a workshop to discuss and seek comments on draft proposed methods for collecting, processing, and structuring of energy data as part of the its collection of customer-level billing data under the newly adopted California Code of Regulations, Title 20, Section 1353 ("the workshop"). Southern California Edison (SCE) participated in the workshop and appreciates the opportunity to provide these written comments on the CEC's Disaggregated Demand Data Cleaning Workshop and the latest versions of the draft ETL Methodology and data dictionary, dated Dec. 3, 2018 and Nov. 18, 2018, respectively. SCE's comments are structured below in response to the CEC's Prompts for Written Comments ("Prompts") filed on December 21, 2018, which are listed in Appendix A.

I. SCE Response to Question 1 on Energy Efficiency (EE) Programs and Measures

A. In response to Question 1a, SCE notes the following on the proposed EE tables:

In the EnergyEfficiencyParticipation table, and based on arguments above, Premise ID does not seem to be necessary.

When securing information on EE dates, the CEC should keep in mind that StartDate is used to show when a workpaper/measure is in effect and is not associated with a specific customer. SCE is unable to provide a true start date, because how the measure is offered will impact whether the Installation Date or the Application Date comes first.

SCE Claim Date is equal to Authorized Signature Date. SCE populates the field with the SAP posting date for the transaction. All claims data that is submitted to the CPUC are

based on using this date as the cutoff. ClaimDate and EndDate are both populated with Authorized Signature Date.

Customer dates that SCE submits are Application Date, Installation Date, Paid Date, Customer Agreement Date, Authorized Signature Date, and Project Completion Date. The Paid Date is when the check is sent to the customer.

In the EnergyEfficiencyPrograms table, EEProgramDesc can be found in the implementation plans that are posted on CEDARS and are not easily condensed into a small text field.

In the EnergyEfficiencyMeasures table, the EEMeasureDesc and MeasureName fields are used interchangeably and would not be different.

- B. In response to Question 1b, Energy Efficiency (EE) data is currently submitted to the CPUC on a schedule (below) set by the California Public Utilities Commission (CPUC). The IOUs require approximately 60 days after the close of the quarter to submit EE data to the CPUC.

While the EE data is financially reconciled, verified, and cleaned before it is submitted, the CPUC also has the ability to provide dispositions or workpaper updates that retroactively change savings values for the entire year. This necessitates a final true up of data alongside the EE Annual Report, filed publicly on May 1st of the following year. Any requests for data, therefore, must refresh the entire data set for the year at the annual report claim to reflect the latest available information and the final IOU submissions.

2018 Energy Efficiency Reporting Schedule	Due Date
Q1 Claims	5/31/18
Q2 Claims	9/15/18
Q3 Claims	11/30/18
Q4 Claims	3/1/19
2018 Annual Report / Claims True Up	5/1/19

SCE notes that the majority of the data is currently available publicly on the CPUC CEDARS website: <https://cedars.sound-data.com/> Personally identifiable information (PII), however, is not available in the data and is instead submitted to the CPUC via secure FTP. If the CEC is unable to request the information directly from the CPUC, SCE could send a copy of the PII that combines with the public information on CEDARS.

- C. SCE has no comment with respect to Question 1c on POU EE data.

II. SCE Response to Question 2 on Alternate CCA and DA Data Collection Solutions

Regarding billing data solutions, SCE recommends combining Community Choice Aggregation (CCA) and Direct Access (DA) indicators into one table and adding vintage year. Ideally, there would only be one table containing a DA/CCA flag, the ESP/CCA name, and also the vintage year. The inclusion of the Service Account Number/ID would allow this table to be linked back to other tables to match service accounts with the usage data.

The vintage year for both DA and CCA customers is an important element for determining the Cost Responsibility Surcharge (CRS) related to rates. This is currently an important issue and usage patterns may vary with vintage years.

It would be advisable to combine and structure the CCA and DA indicators in a table similar to the following:

Service_Account_ID	DA_CCA_Flag	Vintage	DA_CCA_Entity
123	DA	2001	ESP Power Co.
456	CCA	2014	CPA
789	DA	2009	ESP Electric Co.

III. SCE Response to Question 3 on Structuring and Collecting Rate Schedules

For rate information, SCE recommends having a two-tier system. SCE has the PUC Group and then the Rate Literal. The PUC Group would be TOU-GS-1 for example, and the rate literal would have information similar to the PUC Group, but may also contain various rate options and DA/CCA information. For example, TGS1-A-APS-C tells the analyst that the customers with this rate literal are option A (energy only), AC cycling (APS) and also CARE. A rate literal TOU-GS-1 \$ is an option A TOU-GS-1 customer (this is the default for TOU-GS-1) and also a CCA, denoted by the '\$' symbol (the '@' symbol is used to denote DA). In this way, various option information is contained in a single field. See Appendix B for SCE's Rate Schedule.

IV. SCE Response to Question 4 on Unmetered Estimates

SCE notes that it only has limited geographic identifiers for its unmetered customers—typically an address.

SCE can only report estimated monthly unmetered consumption for certain rate groups. The street light rates that are unmetered are LS-1, LS-2, OL-1 and DWL. For all unmetered street light lamps¹, the kWh, at the monthly level, is an estimate based on the annual kWh calculations. The annual kWh is calculated based on the load wattage and the number of hours for either Mid-

¹ Note that the number of different lamp types is rather large. There are High Pressure Sodium Vapor, Mercury Halide, Low Pressure Sodium Vapor, Incandescent, and LED lamp types. Further, there are different wattages for each lamp type.

Night or All-Night service (2,170 and 4,140 hours respectively). This annual kWh number is then divided by 12 to yield a monthly kWh estimate. The only way to obtain a more exact kWh number would be to meter these street light accounts.

The street light rate group LS-3 is metered as are the traffic control lights, TC-1.

V. SCE Response to Question 5 on Submeter Data

For domestic master metered customers, SCE only has visibility to the data at the master meter level, the number of units, and the number of CARE customers. The data at the submeter level is owned by the Master Metered customer. However, in various proceedings related to the diversity adjustment for Master Metered customers, it has generally been the case that the submeter data from the Master Metered customer is of very poor quality.² Thus, the submeter data is unreliable. SCE is unclear as to whether the CEC is seeking to obtain a summarized read of the meters or a more detailed meter read.

For example, the customers in a master metered mobile home park, apartment building, etc. are not SCE customers. They are customers of the master metered customer (e.g., in the case of a master metered mobile home park, the master metered customer is the mobile home park owner). If the sub-metered customers have any sort of disputes and they contact SCE, they are referred to the Department of Weights and Measures, who is the relevant regulatory agency.

VI. SCE Response to Question 6 on Proposed Data Source Schema

SCE reiterates its comments at the workshop where it submitted that using Service Account ID and Service Point ID are preferred identifiers over using Premise and Meter ID. For the type of customer-level billing data that is needed to meet the requirements of Title 20, Section 1353, SCE does not consider the use of Premise ID and Meter ID as necessary, because interval load data is stored in SCE's database at the Service Point ID (which is aggregated over the Meter IDs). Including Meter ID would not be helpful as it creates duplicates of the interval data and, furthermore, usage and billing data are calculated at the Service Account level. Finally, Premise ID is carry-over from a legacy system with the same functionality as CSS Installed Service Number. Due to a slight misunderstanding about the schedule, SCE was not present at the meeting when this discussion was held with the Section 1353 technical working group.

SCE does not have any further comments on Questions 7 or 8.

VII. Conclusion

SCE appreciates the CEC's consideration of these comments and looks forward to its continuing collaboration with the Energy Commission and stakeholders. Please do not hesitate to contact me at (916) 441-3979 with any questions or concerns you may have. I am available to

² When determining the diversity adjustment, SCE uses a sample of directly metered customers who live in mobile home parks. Thus, the actual data used for rate design/setting proxies for submetered information that is not directly accessible. Thus, this is an issue/problem even for SCE.

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discuss these matters further at your convenience.

Very truly yours,

/s/

Catherine Hackney

Appendixes

Appendix A. CEC Prompts for Written Comments, Filed Dec. 21, 2018.

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 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.
- c. 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 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.

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.

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.

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?

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.

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.

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

January 3, 2019

Appendix B. SCE Rate Schedule

UOM_ID	UOM	DESC
0	NA	NOT APPLICABLE
1	KW	KILOWATT
2	KWH	KILOWATT-HOUR
3	GALLON	GALLON
4	THERM	THERM
5	HP	HORSE POWER
6	KVA	KVA
7	KVAR	KVAR
8	KVARH	KVARH
9	LAMPS	LAMPS
10	DAYS	DAYS
11	\$	\$
12	LAMP	LAMP
13	UNIT	UNIT
14	NUMACCTS	NUMACCTS
15	NUMMTRS	NUMMTRS
16	POLE	POLE
17	STAX	STAX
18	STXX	STXX
19	CTAX	CTAX
20	CTXX	CTXX
21	DAY	DAY
22	TON	TON
23	TONS	TONS
24	THRM	THRM
25	GAL	GAL
26	POLES	POLES
27	EKWH	EKWH
28	THERMS	THERMS
29	UNITS	UNITS