

**DOCKETED**

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**Response to the Energy Commission's Methods for Collecting and Processing Disaggregated Demand Data**

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

In the matter of:	)	Docket No. 18-MISC-05
	)	
Title 20 Section 1353 “Disaggregating Demand Data”	)	Workshop RE: Proposed Disaggregated Demand Data Collection and Processing Methods
	)	
	)	

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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE CALIFORNIA ENERGY COMMISSION (CEC) PROPOSED DISAGGREGATED DEMAND DATA COLLECTION AND PROCESSING METHODS**

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Dated: January 7, 2019

**BEFORE THE ENERGY COMMISSION**

**OF THE STATE OF CALIFORNIA**

In the matter of: ) Docket No. 18-MISC-05  
)  
Title 20 Section 1353 “Disaggregating Demand ) Workshop RE: Proposed Disaggregated  
Data” ) Demand Data Collection and Processing  
) Methods  
)

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**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER (LADWP) TO THE  
CALIFORNIA ENERGY COMMISSION (CEC) PROPOSED DISAGGREGATED DEMAND DATA  
COLLECTION AND PROCESSING METHODS**

**INTRODUCTION**

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the California Energy Commission’s (CEC’s) Disaggregated Demand Data Cleaning Workshop on December 11, 2018.

The LADWP is a publicly-owned water and electric utility of the City of Los Angeles, serving a population of over 4 million people within a 465 square mile service territory including the City of Los Angeles and portions of the Owens Valley. The LADWP’s mission is to provide reliable water and power in a safe, environmentally responsible, and cost-effective manner. LADWP is a vertically-integrated utility that generates and delivers electricity to customers. LADWP’s electricity supply comes from a diverse mix of generating resources that are located within the state of California as well as out-of-state resources located in Arizona, Nevada, Utah, Wyoming, and the Pacific Northwest.

**SPECIFIC COMMENTS ON THE CEC STAFF PROPOSED DISAGGREGATED DEMAND DATA  
COLLECTION AND PROCESSING METHODS**

*Consider integrating requested data with the current SB1037 annual reporting*

In September 29, 2005, Senate Bill 1037 added the following language of Section 9615 to the Public Utilities Code:

*(a) Each local publicly owned electric utility, in procuring energy, shall first acquire all available energy efficiency and demand reduction resources that are cost effective, reliable, and feasible.*

*(b) Each local publicly owned electric utility shall report annually to its customers and to the State Energy Resources Conservation and Development Commission, its investment in energy efficiency and demand reduction programs. A report shall contain a description of programs, expenditures, and expected and actual energy savings results.*

As a result, LADWP, and other California POU's alike, has taken steps to ensure compliance to the Senate Bill (SB) 1037 modifications to the Public Utilities Code. One such step taken by LADWP is to utilize the shared POU Cost Effectiveness Tool to report SB 1037 data directly to the Energy Commission. LADWP have identified opportunities to report Section 1353 and Section 9615 data more efficiently. The proposed improvements for consideration are:

Overlapping reporting areas between Section 1353 and Section 9615 are as follows:

- First, the Energy Efficiency (EE) Program Description/Name (used in CEC Reporting Forms) that includes details for each EE program (Customer Rate Type, Building Type, Category, CEC Program Name, Load Shape) A "program" consists of a measure or group of measures that are grouped or marketed together (e.g. Residential Lighting).

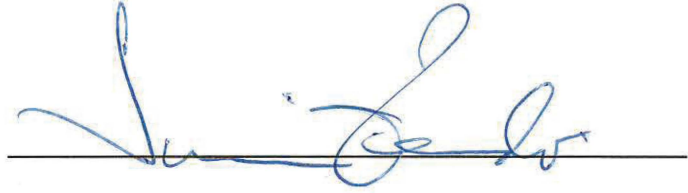
- Second, a unique Energy Efficiency Measure Item Number (Measure Number) is listed for specific classification of measures.
- Lastly, Energy Efficiency Participation – installed measures under each energy efficiency program.

In addition, there are delays in completing the new cost effectiveness tool for SB 1037 partly because the 8760 loadshapes are currently being updated. The delays in completing the SB 1037 reporting tool and the concurrent development of a new tool for CEC Section 1353 present an opportunity for integration and efficiency.

## **CONCLUSION**

In closing, LADWP appreciates the opportunity to participate in this commenting process regarding the proposed revisions to the Proposed Disaggregated Demand Data Collection and Processing Methods. LADWP looks forward to continue working with the California Energy Commission to help shape effective regulations that will benefit the health, safety, and security of all California residents.

Respectfully Submitted,



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