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

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| In the matter of: |) | Docket No. 18-OIR-01 |
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| Developing Regulations, Guidelines and Policies for Implementing SB 350 and the Warren-Alquist Act |) | SMUD Comments Re: Title 20 Data Collection Regulations to Support New Analytical Needs – Phase 2 |
| |) | |
| |) | |
| |) | |
| |) | November 13, 2020 |

**Comments of SACRAMENTO MUNICIPAL UTILITY DISTRICT on
Developing Regulations, Guidelines and Policies for Implementing SB 350
and the Warren-Alquist Act**

The Sacramento Municipal Utility District (“SMUD”) respectfully submits these comments to the California Energy Commission (“CEC”) regarding the *Title 20 Data Collection Regulations to Support New Analytical Needs – Phase 2* (“Proposed Title 20 Regulations”) as set forth in the CEC’s Developing Regulations, Guidelines and Policies for Implementing SB 350 and the Warren-Alquist Act (Docket 18-OIR-01). SMUD’s comments are in response to the Proposed Title 20 Regulations workshop held on October 27, 2020.

The Proposed Title 20 Regulations pre-rulemaking proceeding directs the CEC to amend the energy data collection to support implementation of SB 350 (de Leon, Chapter 547, Statutes of 2015) and to improve California energy analytics.

We offer the following comments on the Proposed Title 20 Regulations:

- 1) *§1304 Power Plant Reports*. Support for consolidating reporting requirements.
- 2) *§1304 Power Plant Reports*. Confirmation of the CEC’s intent to move the rate schedule requirement from customer-owned behind-the-meter systems to all power plants and energy storage systems.
- 3) *§1353 Disaggregated Demand Data*. Constraints on availability of historical data.
- 4) *§1385 EVSE Station Data Reporting and Criteria*. Streamlining data requests and how the CEC may work collaboratively with other agencies to collect the necessary data.
- 5) *§1385 EVSE Station Data Reporting and Criteria*. Align existing reporting timelines to minimize duplicative reporting.

SMUD expands on these points in the sections below.

1. §1304 Power Plant Reports. Support for consolidating reporting requirements.

SMUD appreciates the opportunity to participate in the pre-rulemaking for data reporting of electric generation power plants (Public Resource Code, Title 20, Chapter 3, Data Collection). We support consolidating the wind reporting requirements into the same regulation as other electric generation resources to streamline the reporting process.

2. §1304 Power Plant Reports. Confirmation of the CEC's intent to move the rate schedule requirement from customer-owned behind-the-meter systems to all power plants and energy storage systems.

SMUD would like to confirm the CEC's intent to move the rate schedule requirement from customer-owned behind-the-meter systems to all power plants and energy storage systems, which include those directly connected to a utility's distribution or transmission system (§1304 (b)(3)(G)). These directly connected resources are either owned by the utility or under a power purchase agreement (PPA). They are not served under retail rate schedules, other than the station service for times when the resources are not producing. Also, some resources have station service provided by other UDCs if located in their territory. Accordingly, reporting rate schedules for these resources directly connected to a UDC's system does not seem consistent with the intent of the rate schedule requirement.

SMUD recommends inserting additional language to clarify that the rate schedule only applies to customer-side generation and not traditional power plants operated by the utility or contracted under a PPA or similar agreement.

3. §1353 Disaggregated Demand Data. Constraints on availability of historical data.

SMUD only retains 36 months of billing data and 42 months of non-interval reads from the creation/document date in the operational systems. After 36 months, these datasets are archived and difficult to extract, requiring additional cost, time, and staff resources for further development work and testing.

4. §1385 EVSE Station Data Reporting and Criteria. Minimize duplicative data requests and work collaboratively with other agencies on necessary data collection.

SMUD has had an active Electric Transportation Program since 1990 and has been a leader in statewide electric vehicle (EV) policy development since that time. As such, SMUD maintains electric transportation programs that support both vehicle and charging infrastructure deployment, and we operate a small public DC Fast Charging network in Sacramento County.

While we recognize that this draft regulation may provide potential benefits to effective EV infrastructure deployment if correctly scoped, there is a potential for substantial duplicative reporting. Much of the information requested by the CEC is already being provided to the National Renewable Energy Laboratory (NREL), the Air Resources Board (ARB), and the California Public Utilities Commission (CPUC) to meet the requirements for increasingly

granular analyses required by SB 350. SMUD recommends that the CEC consider data reporting efforts already underway and utilize data from these ongoing efforts. Coordination between the CEC and other agencies could be leveraged for the CEC's data needs, which may minimize duplicative data gathering and reporting.

5. §1385 EVSE Station Data Reporting and Criteria. Align existing reporting timelines to minimize duplicative reporting.

The ARB Electric Vehicle Supply Equipment (EVSE) Standards Regulation requires EVSPs operating Level 2 or Direct Current Fast Charger (DCFC) EVSE in California to submit annual inventory information as of March 1, 2022 and each year thereafter. To maximize the efficiency of our reporting resources, we respectfully request that the CEC align its reporting timeline with the ARB's reporting start date, as well as require reports to be submitted on an annual basis.

Conclusion

SMUD thanks the CEC for its leadership and innovation in advancing California's environmental goals. We commend the CEC's efforts, and we encourage the swift implementation of known strategies that reduce the devastating effects of climate change. As always, SMUD appreciates the opportunity to provide comments on the Proposed Title 20 Regulations.

/s/

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cc: Corporate Files (LEG 2020-0157)