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NCPA Comments on October 27 Data Collection Workshop

Northern California Power Agency Comments

Additional submitted attachment is included below.

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of:

Developing Regulations, Guidelines and Policies for Implementing SB 350 and the Warren-Alquist Act

Docket No. 18-OIR-01

Re: Title 20 Data Collection Regulations to Support New Analytical Needs – Phase 2

NORTHERN CALIFORNIA POWER AGENCY COMMENTS

The Northern California Power Agency (NCPA)¹ appreciates the opportunity to provide these comments to the California Energy Commission (CEC or Commission) on the October 27, 2020 Pre-Rulemaking Workshop and supporting materials regarding energy data collection to support implementation of SB 350 and to improve California energy analytics. NCPA supports the proposed modifications to the data collection regulations that remove duplicative reporting requirements and streamline the process for sharing reported data between agencies. NCPA has long advocated for refinements and improvements to the entire scheme of energy data reporting, including greater coordination and recognition of the reporting requirements from other state (and Federal) energy agencies.

I. CHANGES THAT RECOGNIZE REPORTS SUBMITTED TO OTHER AGENCIES SHOULD BE ADOPTED

A number of the proposed revisions are intended to remove duplicative reporting requirements, and should be incorporated into regulation. The cost of compiling and reporting data are not insignificant, and those costs are ultimately borne by the publicly owned utility (POU) customers. For this reason, NCPA supports the proposed changes to section 1303(i) regarding the submittal of alternative data, reports, or format. This proposed change would remove the burdensome process for POU's (and other reporting entities) to apply for and receive authorization to submit data or reports that are compiled for or prepared for other agencies and purposes. Replacing this requirement with the ability for the POU to submit the comparable data in the form of an "alternative filing" with an attestation significantly reduces the reporting burden. Likewise, the Commission should adopt the proposed change that would remove the duplicate requirement in section 1311 regarding Energy Efficiency Program Data Collection

¹ NCPA is a not-for-profit Joint Powers Agency, whose members include the cities of Alameda, Biggs, Gridley, Healdsburg, Lodi, Lompoc, Palo Alto, Redding, Roseville, Santa Clara, and Ukiah, as well as the Bay Area Rapid Transit District, Port of Oakland, and the Truckee Donner Public Utility District, and whose Associate Member is the Plumas-Sierra Rural Electric Cooperative.

from Local Publicly Owned Utilities to reference the existing reporting obligation under PUC section 9505.

II. THE COMMISSION SHOULD EXPLORE OPPORTUNITIES TO COORDINATE ELECTRIC VEHICLE SUPPLY EQUIPMENT REPORTING WITH SISTER AGENCIES

The Commission also proposes the addition of significant new reporting requirements related to Electric Vehicle Supply Equipment (EVSE). While NCPA understands the Commission's obligation and need to compile the requested data, the amount and type of EVSE information sought is extensive. NCPA urges the Commission to work with stakeholders and the California Air Resources Board (CARB) to review the type of information needed and how some of that information is already being reported. To the extent that reporting entities are also required to provide the same or substantially similar information to CARB or other agencies, or to the extent that the data is already collected from other agencies, NCPA strongly encourages the Commission to continue to work with its sister agencies to coordinate data collection and reporting requirements. NCPA also supports the proposed clarifications to the EVSE provision set forth in sections 1382, 1385 EVSE, and 1386 as set forth in the Comments of Anaheim Public Utilities on Commissioner Workshop on Title 20 Data Collection Regulations, dated November 12, 2020.

III. CONCLUSION

NCPA is encouraged by the suggested revisions that recognize the need to address duplicative reporting requirements and coordination with reports and information provided to other state and federal agencies. Reducing the reporting burden is going to be increasingly important as the data collected evolves to address the state's decarbonization efforts, and NCPA looks forward to continuing to work with the Commission and stakeholders on amendments to the data collection regulations that achieve the dual goal of gathering essentially needed information without unduly burdening the reporting entities.

Please do not hesitate to contact the undersigned or Scott Tomashefsky at 916-781-4291 or scott.tomashefsky@ncpa.com with any questions.

Dated November 13, 2020

Respectfully submitted,



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