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Additional submitted attachment is included below.



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Attention: California Energy Commission

RE: Energy Data Collection Rulemaking (Phase 2) – Docket Log: 18-OIR-01

The California Center for Sustainable Communities (CCSC) at the University of California Los Angeles has extensive experience working with granular, account level energy consumption and EE program participation data through the development of its Energy Atlas research products and websites. It is on the basis of this experience that we provide the following comments and suggested revisions to CEC's proposed Energy Data Collection Rulemaking procedures under consideration in this proceeding.

Comment #1:

Regarding the Following Proposed Language:

§ 1306. LSE and UDC Reports, and Customer Classification Reports.

(a) Quarterly UDC Reports.

(1) Each UDC shall report the number of customers, revenue expressed in dollars, volume expressed in kWh for all electricity sold or delivered by the UDC during each of the previous three months as follows:

(A) sales to bundled customers classified by county, retail rate class, and customer classification code;

Each Community Choice Aggregation (CCA) has its own set of retail rate classifications. These retail rate classifications reflect not only the tariff paid by the customer but also the fraction of the power sold that is provided from clean, renewable sources. Currently, among the state's existing CCAs, these retail rate classifications most commonly range from: IOU parity, 50% renewable, 100% renewable. In

order to accurately calculate the GHG emissions associated with the electricity usage tallied in the quarterly UDC reports, it is essential that the reported rate codes clearly map to the renewables content of the generation mix that is being used to provide them. Consequently, we suggest that for all customers – both CCA’s and regular IOU ratepayers - the renewables content associated with each rate code be either directly provided in the UDC reported data or clearly referenced, with appropriate links to relevant LSE power content labels or other similar documentation.

Comment #2:

Regarding the following proposed language:

§ 1312. Energy Efficiency Program Data Collection from Non-Utility Programs

Beginning in 2021, and every year thereafter, each PACE program administrator shall report no later than March 15 to the Commission its annual investments in energy efficiency programs for the previous fiscal year. The report shall include:

- (a) Program Name: title or name of the PACE program (Example: mPower Placer);*
- (b) Sector Indicator: Flag to indicate the sector that the program targets (“R” for residential and “NR” for non-residential);*
- (c) Project ID: a unique ID for each project implemented under the program;*
- (d) Assessor’s parcel number (APN): The county name and assessor’s parcel number (APN) of the site at which the project was implemented;*
- (e) Project Address; the street address of the project.*
- (f) Project Start Date: the date the project implementation was started in the mm/dd/yyyy format;*
- (f) Project Completion Date: the date the project implementation was completed in the mm/dd/yyyy format;*
- (h) Measure Types: the efficiency measure implemented, including but not limited to*
 - a) Lighting,*
 - b) Heating, Ventilation, and Air Conditioning (HVAC),*
 - c) Domestic Hot water,*
 - d) Enclosure (walls, windows, roof), and*
 - e) Self Generation including roof top PV; and*
- (i) Renewable Generation Indicator: to indicate whether the project included investments in self-generation projects.*

Having previously worked directly with PACE program data for Los Angeles County we at the CCSC have a number of suggestions for ways in which the usefulness of the reported data could be dramatically enhanced relative to the goal of conducting before/after type program efficacy analyses.

(1) Require Reporting of the PACE Program Recipient Customer’s Utility Account Identification Number

Our experience has shown that individual addresses and APNs can encompass a surprisingly large number of unique utility customer accounts. This is especially true for commercial/industrial and multi-family residential properties. In order to precisely isolate the consumption profile associated with a set of implemented PACE program measures it would be extremely beneficial for CEC to have access to the actual utility account number associated with the customer who was in receipt of the program measures.

(2) Require Reporting of the Funds Spent on Each Specific Program Measure

Our experience has shown that that many PACE program interventions not only bundle multiple measures together but also, implement individual measures to a wide range of different extents depending upon the site-specific characteristics/needs of the building(s) involved. Thus, in order to perform any sort of meaningful before/after program efficacy analysis, it becomes necessary to normalize the estimated energy savings by the amount of money spent per measure.

(3) Require Reporting of Self Generation System Attributes

In addition to a binary flag indicating the presence or absence of a self-generation system on a PACE program recipient site we recommend that the following specific detailed system attributes be additionally reported: nameplate capacity (kW) of any installed generation assets, separate identifiers for rooftop or canopy solar installations, and identification of battery storage system rated power (kW) and energy storage (kWh) capacities, if included.

Regards,



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