

California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 12-AB1103-01  
1516 Ninth Street  
Sacramento, CA 95814-55

California Energy Commission

**DOCKETED**  
**12-AB1103-1**

TN # 68800

DEC. 07 2012

First off, we would like to acknowledge the state for recognizing the difficulty in requiring owners to obtain tenant consent for the release of data. We agree that it is important to obtain actual whole building energy consumption in order to generate an accurate assessment of a building and it would be meaningless to extrapolate tenant data.

The CEC states that the new proposed language requiring utility and energy providers to release all energy use data for the entire building prevents the alternative of requiring owners to get tenant consent due to the undue burden placed on building owners. We would like to make sure that the process of obtaining this aggregated whole building data will not be just as burdensome.

From working with different utility companies across the country, we have found that the process for obtaining tenant data and whole building data is not uniform. For instance, ComEd in Chicago will provide aggregated electricity consumption as long as they are given the tenant's name, service address and meter number(s). This is all information that is accessible to owners without having to ask their tenants. However, if the utility companies request proprietary account information such as account numbers/service id numbers, which is the case for Southern California Edison, then the owners are still placed with the difficult task of obtaining tenant information.

We strongly encourage requiring utility companies to provide whole building data without asking owners to provide proprietary tenant information.

Thank you,

**Tema Yaravitz**

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