

FIRSTFUEL SOFTWARE

Building Energy Analytics

Comments of FirstFuel Software October 25, 2013

California Energy Commission
Re: Docket No. 13-CCEJA-1
1516 Ninth Street
Sacramento, CA 95814
VIA EMAIL (docket@energy.ca.gov)



RE: FirstFuel’s Comment on the CEC’s California Clean Energy Jobs Act – 2013 Program Implementation DRAFT Guidelines

1. Introduction

FirstFuel Software (FirstFuel) appreciates the opportunity to comment on the California Energy Commission’s (CEC) Proposition 39: California Clean Energy Jobs Act – 2013 Implementation Draft Guidelines (the Guidelines). FirstFuel commends the extensive effort undertaken by the CEC in producing these Guidelines, and the outreach activities to educate and engage stakeholders throughout the state of California.

FirstFuel is a commercial energy analytics company that analyzes smart meter consumption data to provide turn-key solutions for energy efficiency and as well as to provide demand response services in commercial buildings. FirstFuel utilizes and leverages the state’s investment in smart meters to provide an end-to-end solution from screening and inventorying buildings and efficiency projects, conducting analytics-enabled energy audits, prioritizing efficiency projects, carrying out sophisticated building benchmarking, and providing long-term monitoring, evaluation, measuring, and verification of projects to ensure energy savings persist. Our strategic approach allows for a seamless integration with schools to identify and implement operational and retrofit opportunities best suited for their individual buildings. Specifically, FirstFuel’s analytics-enabled lifecycle approach includes the following steps:

- **Screen/Inventory/Benchmark** – Prioritize leading candidate buildings across LEAs portfolios
- **Energy Audit** –Uncover specific retrofit and operational efficiency savings opportunities within buildings
- **Engage and Implement** – Drive action from customers through insight-driven engagement
- **Monitor, Measure, Evaluation, Verify, and Report** – Track the energy performance/reduction in buildings across time after implementation to ensure persistence of savings

2. The CEC should maintain the flexibility provided in the draft guidelines that allows LEAs to Use Data Analytics – this ensures compliances to SB 73 Section 26235(b)

Senate Bill (SB) 73 recognizes the manifold benefits of data analytics of energy data – such as, cost-savings, speed, scalability, consistency, and on-going customer engagement, etc. – by including the following provision to ensure LEAs can realize those benefits:

“the Energy Commission shall allow [emphasis added] the use of data analytics of energy usage data, where possible, in the energy auditing, evaluation, inventorying, measuring, and verification of projects.”¹

FirstFuel commends the Draft Guidelines’ adherence to this statutory requirement through the articulation and acknowledgment of data analytics as an option for LEAs and urges the CEC to maintain that flexibility in the Final Guidelines. For example the Guidelines appropriately acknowledge the important role data analytics can play for LEAs’ Pre-Expenditure Plan Approved Activities,² and LEA’s Step 5: Energy Project Identification efforts.³ **FirstFuel applauds the CEC and assumes the Final Guidelines will continue to maintain the flexibility explicitly provided for in SB 73, i.e., for LEAs to be able to choose to use data analytics “in energy auditing, evaluation, inventorying, measuring, and verification of projects” as they so desire.**

Further, Senate Bill (SB) 73 recognizes the importance of ensuring the quality of data analytics in the following provision:

“To ensure quality of results data analytics providers shall receive prior technical validation [emphasis added] by the Energy Commission, a local utility, or the Public Utilities Commission.”⁴

FirstFuel recognizes the importance of this provision and has met it through a successful Scaled Field Placement technical validation completed by Pacific Gas & Electric in February 2013. This prior technical validation was conducted as an Emerging Technologies Coordinating Council initiative (the ETCC is comprised of Pacific Gas & Electric, Southern California Edison, San Diego Gas & Electric, and Southern California Gas, SMUD, the California Energy Commission, and the California Public Utilities Commission.)

3. Technical Clarification Needed For Large Expenditure Plan Award Requirements (Tier 4)

Our specific comments focus on the “site specific” project requirements detailed in the Large Expenditure Plan Award Requirements (Tier 4). FirstFuel requests a technical fix to clarify CEC adherence to SB 73 legislative language as noted below. Public Resources Code section 26233(b)(3) states:

“For every local education agency that receives over one million dollars (\$1,000,000) pursuant to this subdivision, not less than 50 percent of the funds shall be used for projects larger than two hundred fifty thousand dollars (\$250,000) that achieve substantial energy efficiency, clean energy, and jobs benefits.”

In defining the process for Expenditure Plans, the Guidelines reference the above Public Resource Code language from SB 73, but then go further to state, “A large expenditure plan project is defined as a project *at a school site* whose project costs total more than \$250,000.”⁵

FirstFuel recommends the CEC remove that is larger than \$250,000, and some larger school districts will have more cost-effective energy efficiency opportunities when combining multiple school sites together for one distinct project under their expenditure plan. The additional language in the

¹ Senate Bill (SB)73 - Public Resource Code section 26235(b).

² Proposition 39: California Clean Energy Jobs Act – 2013 Program Implementation DRAFT Guidelines-REV2 p. 9.

³ Ibid, p. 17-18.

⁴ Senate Bill (SB)73 - Public Resource Code section 26235(b).

⁵ Proposition 39: California Clean Energy Jobs Act – 2013 Program Implementation DRAFT Guidelines. Page 11.

guidelines that specifies school site would produce unintended negative consequences for the larger Tier 4 school districts. For example, requiring a Tier 4 school district to spend \$250,000 at one site will create equity issues for smaller schools within the district. FirstFuel requests this technical clarification be made to ensure adherence to original language in SB 73 and avoid the unintended consequences the extra clause would create.

Respectfully Submitted,

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