

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Concerning
Energy Efficiency Rolling Portfolios, Policies,
Programs, Evaluation, and Related Issues.

Rulemaking 13-11-005
(Filed November 14, 2013)

**RESPONSE OF
THE CALIFORNIA EFFICIENCY + DEMAND MANAGEMENT COUNCIL TO
MOTION OF COUNTY OF VENTURA REGARDING DATA ACCESS**

Dated: June 20, 2022

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I. INTRODUCTION

The California Efficiency + Demand Management Council¹ (“The Council”) respectfully submits this Response to the Motion of County of Ventura for the Tri-County Regional Energy Network (“3C-REN”) Regarding Data Access, submitted in this proceeding on June 3, 2022. This Response is timely filed and served pursuant to Rule 11.1(e) of the Commission’s Rules of Practice and Procedure.

II. BACKGROUND

The Council is a statewide trade association of non-utility businesses that provide energy efficiency, demand response, and data analytics services and products in California. Our member companies employ many thousands of Californians throughout the state. They include energy efficiency (“EE”), demand response (“DR”), and distributed energy resources (“DER”) service providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and energy efficient product manufacturers. The Council’s mission is to support appropriate EE and DR policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

¹ The views expressed by the California Efficiency + Demand Management Council are not necessarily those of its individual members.

III. THE MOTION CORRECTLY STATES THE IMPORTANCE OF DATA ACCESS TO EFFECTIVE AND MODERN EE PROGRAMS

The Council observes that the State of California, similar to many other states and regions across the United States, is facing a growing suite of challenges related to energy affordability, grid reliability, and grid resiliency. Cost-effective EE programs and projects are ready and available to be deployed to aid California's grid so, pursuant to Decision ("D.") 11-07-056, the Commission should ensure that Regional Energy Networks ("RENs") and their program implementers have access to the customer data needed to implement their Commission-approved programs.

The Council agrees with 3C-REN that participant and non-participant data are necessary for program administrators ("PAs") to operate their EE programs and should be provided to PAs and their contracted Implementers who are able to comply with the investor-owned utility ("IOU") data security policies. Data and access to data are essential for effectively running modern EE programs (e.g. behavioral programs, strategic energy management ("SEM"), and programs that leverage site- and population-level Normalized Metered Energy Consumption ("NMEC") measurement and verification methodologies). The Council finds it hard to believe that in approving 3C-REN's NMEC Single Family Home ("SFH") Program, it was not the Commission's intent that the local IOUs would be required to provide the customer data needed to implement the program.

IV. THE COUNCIL RECOMMENDS THAT THE COMMISSION ADOPT 3C-REN'S MOTION AND APPLY THE RULING TO ALL REN PAS

The Council recommends that the Commission adopt 3C-REN's motion. However, because the Council is aware this issue is not limited to 3C-REN, we respectfully urge the Commission to extend the adoption of 3C-REN's motion to apply broadly to all non-IOU PAs that comply with IOU data security policies. This ruling would avoid a repeat of this current situation and direct all IOUs to provide the necessary participant and non-participant data to the respective RENs and/or their program implementer(s) serving customers in the respective IOU service territory(ies) so that the RENs may effectively operate their EE programs.

The adoption of this motion is necessary not just so 3C-REN may operate their already launched (yet stalled due to a lack of customer data) NMEC Single Family Home Program, but

also so all RENs may operate their EE programs to provide greater energy and cost saving benefits to the customers they serve. The Council is also supportive of providing implementers with data access related to non-IOU PAs and recommend that this requirement be extended to implementers and PAs of statewide programs as well. The Council recognizes that this is a broader issue that may be better addressed through a dedicated but timely and transparent process that is focused on customer data challenges for all third-party EE, DR, and DER providers. This could come in the form of a new rulemaking or a dedicated track in an existing proceeding such as Application (“A.”) 18-11-015, where the Commission is considering the IOUs’ proposals for implementing a “click-through” customer data authorization process pursuant to Resolution E-4868.

V. DATA ACCESS IS NECESSARY TO MAXIMIZE MODERN EE BENEFITS AND SHOULD NOT OVERLAP WITH OTHER OR EXISTING PROGRAMS

The Council suggests data access provided to non-IOU PAs does not overlap with existing or other programs. In order to best leverage the value of data collected for EE programs, it is crucial the data provided does not incorporate data from existing or other programs. It is important that non-IOU PAs have access to participant and non-participant data which does not overlap with other or existing programs to ensure that non-IOU PAs can operate and analyze their EE programs to further maximize the effectiveness of those and future programs.

VI. CONCLUSION

The Council respectfully submits this Response and appreciates the opportunity to provide input on 3C-REN’s Motion.

Respectfully submitted,

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