**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

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| Order Instituting Rulemaking Concerning Energy Efficiency Rolling Portfolios, Policies, Programs, Evaluation and Related Issues. | Rulemaking 13-11-005 (filed November 14, 2013) |

# COMMENTS OF MISSION:DATA REGARDING PROGRAM ADMINISTRATOR 2015 ENERGY EFFICIENCY INVESTMENT PROPOSALS (PHASE 1)

**FOR MISSION:DATA**

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Dated: April 7, 2014

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## 1. INTRODUCTION

Mission:Data, a new coalition of innovative companies that enable consumers to save energy and money through access to their own energy usage data and new technology tools[1], appreciates the opportunity to submit comments regarding California program administrators' proposed 2015 energy efficiency programs and budgets. The Order Instituting Rulemaking established a three-phase approach for updating California's ratepayer-funded energy efficiency programs. The Assigned Commissioner's *Ruling and Scoping Memorandum Regarding 2015 Portfolios (Phase 1 of Rulemaking 13-11-005*), dated January 22, 2014 ("Scoping Memo"), defined the scope of the first phase, addressing 2015 investments with a focus on continuing 2013-14 programs and discrete issues such as retirement of the San Onofre Nuclear Generation Station (SONGS), the need to strengthen the Energy Upgrade California™ Program and implementation of school energy upgrades made possible by passage of Proposition 39. The March 3, 2014 *Ruling Amending Scoping Memorandum and Providing Guidance on Energy Savings Goals for Program Year 2015* ("Amended Memo") amended the schedule of this proceeding and adopted efficiency targets. Cognizant of the need to move forward on the 2015 budgets and remain focused in Phase 1,

[1] Our members are developing innovative information technologies to achieve significant energy savings in both the residential and commercial sectors at scale and include Alarm.com, Bidgely, Brightpower, BuildingIQ, the Cleanweb Initiative, EcoFactor, EnerNOC, EnergyHub, FirstFuel, Genability, iControl Networks, Lucid, People Power, Rainforest Automation, Retoficiency, ThinkEco, and SolarCity.

Mission:Data believes that California's policy leadership in data accessibility can and should be more fully leveraged to achieve the efficiency objectives set forth in the Scoping Memo.

## 2. HARNESSING THE STATE'S DATA ACCESS POLICIES AND AMI INVESTMENT CAN HELP THE STATE ADDRESS THE CHALLENGES IDENTIFIED IN THE SCOPING MEMO.

California – and in particular this Commission – has been a policy leader in empowering consumers with access to their electricity usage data. Within the past two years, California has enabled some consumers to access real-time HAN data directly from the smart meter, and obtain their data through utility web portals through implementation of Green Button. Green Button Connect, through D.13-09-025 (also known as the "Customer Data Access" proceeding), promises the ability for customers to share their consumption data with third parties of their choice beginning in 2015. Enablement of these functionalities is critical to realization of the demand side benefits for consumers, which in turn represent a significant portion of the overall value of the AMI deployment. In the case of Southern California Edison, for example, the energy efficiency and demand response related consumer benefits constitute $816 million – 41% – of the benefits of the AMI deployment. [2]

Technology innovation, fueled by access to granular energy usage data, is driving development of much more powerful energy management tools for consumers, offering novel means to manage their energy use and save money. For example, the Commission's Resolution E-4527 establishes the framework for the enablement of 600,000 HAN devices before the end of this year, and an unlimited number of HAN activations beginning in 2015.[3] Access to real-time, short-interval data from the HAN supports new technologies like disaggregation, the use of algorithms to interpret smart meter data to identify energy used in a building by device. This in turn enables the development of automated personalized recommendations such as "Reduce your pool pump run time to save $__ per month" or "Buying an Energy Star® refrigerator could save you $___ per year." This is but one example of how customer access to energy usage data makes technological development possible to help customers make larger efficiency gains.

The Scoping Memo directs program administrators to "think creatively" and leverage existing resources in their 2015 energy efficiency budgets.[4] Fully leveraging the new technologies that use energy usage

[2] California PUC, Resolution E-4527, September 12, 2013, p. 5.
[3] Id., p. 28
[4] Scoping Memo, p. 5

data now accessible as a result of the State's leadership can play a significant role in cost-effectively addressing the policy challenges detailed in the Scoping Memo.

Mission:Data is encouraged by a number of steps being taken by program administrators to use new energy management tools to strengthen demand response in both the commercial and residential sectors. For example, the program administrators recognize the value that in-building gateway devices can play in enabling consumers to adjust their behavior and cost-effectively target appliances for replacement and residences for home upgrades. For example, all of the utilities propose to include devices with a behavioral component in their Energy Upgrade California™ home upgrade packages. Southern California Edison proposes to make use of technologies like in-home displays and enablement of energy disaggregation as part of its Energy Upgrade program.[5]

The Energy Upgrade program remains relatively limited in scope, however, and Mission:Data believes it is time to realize the significant consumer energy efficiency and demand response gains enabled by new technologies on a much broader scale. All ratepayers are paying for AMI. The additional rebates being offered in regions impacted by the SONGS closure[6], for example, should be extended more widely to in-home devices (displays, gateways) that would enable more consumers in that region – both residential and commercial – to take advantage of Green Button or the activated HAN and have a robust choice of services and products. Although the AMI proceedings occurred many years ago, most of the consumer demand-side benefits of AMI have only recently started, given HAN activation and Green Button. We encourage the Commission to fully exploit AMI's capabilities in its efficiency program structuring, particularly where data access can meaningfully enable both demand and energy savings in SONGS-impacted areas.

## 3. PROGRAM ADMINISTRATORS SHOULD FULLY LEVERAGE ENERGY USAGE DATA TO IMPROVE IMPLEMENTATION OF PROPOSITION 39.

Proposition 39 offers schools the opportunity to incorporate technologies that leverage energy data. Southern California Edison's proposal, for example, embraces greater use of low-touch audits enabled by improved energy data analytics to better target Proposition 39 investments in schools[7] and it plans to include behavioral offerings to approximately 25,000 non-residential accounts, primarily schools.[8] But

[5] Southern California Edison Company, *Southern California Edison Company's (U 338-E) Request for Funding of Energy Efficiency and Demand Response Integrated Demand Side Management Programs and Budgets for 2015*, March 26, 2014, p. 36
[6] Id., p. 13, 18
[7] Id. pp. 28-29
[8] Id., p. 11

many school districts remain entirely unaware of smart meters and data-driven efficiency opportunities.[9] The technical assistance provided schools by program administrators should encompass these opportunities and provide information regarding offerings from third parties.

## 4. CONCLUSION.

Now that our AMI deployment is complete and data access is almost realized, we encourage the Commission to leverage the innovative, data-driven technologies that harness AMI data in meeting the challenges of the SONGS closure, the improvement of energy efficiency in our schools, and residential and commercial building efficiency programs.

Thank you for your consideration.

Dated: April 7, 2014

Respectfully submitted,

FOR MISSION:DATA

/s/

Michael Murray
President
Lucid

[9] Importantly, there are structural reforms to the rebate structure that need to be addressed so that rebates could potentially cover cost-effective energy management software. Mission:Data is sensitive to the "ruthless pruning" of the list of issues that can be addressed in order to obtain timely approval of the 2015 energy efficiency plans. We only briefly note these issues with the hope that they can be addressed in the Phase 2 proceeding later this year.