

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

Order Instituting Rulemaking to Consider
Smart Grid Technologies Pursuant to Federal
Legislation and on the Commission's Own
Motion to Actively Guide Policy in
California's Development of a Smart Grid
System.

Rulemaking 08-12-009
(Filed December 18, 2008)

**REPLY COMMENTS OF
THE LOCAL GOVERNMENT SUSTAINABLE ENERGY COALITION
ON RULING PERTAINING TO CLOSING OF PROCEEDING**

Jody London
P.O. Box 3629
Oakland, California 94609
510/459-0667
jody_london_consulting@earthlink.net

FOR Local Government Sustainable Energy
Coalition

August 15, 2014

I. Introduction

In accordance with the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission” or “CPUC”), the Local Government Sustainable Energy Coalition (“LGSEC”)¹ submits these reply comments the Administrative Law Judge’s (“ALJ’s”) Ruling Seeking Comments Pertaining to Closing This Proceeding and the Filing of Mandated Reports (“Ruling”). The LGSEC responds specifically to the Opening Comments on this matter submitted August 1, 2014 by Marin Clean Energy (“MCE”). The LGSEC concurs with MCE that there continues to be a need for the utilities to provide historical program participation data with other entities engaged in developing and delivering ratepayer-funded energy efficiency programs. Local governments need this information in order to direct energy efficiency marketing and outreach efforts, avoid double dipping, and understand how best to focus and design programs moving forward.

MCE bases its argument on access to program participation data on its status as a community choice aggregator. The LGSEC agrees that there are statutory provisions that require these data be made available to community choice aggregators. Local governments that develop and deliver energy efficiency programs stand in the same position as community choice aggregators for purposes of data access – with the same duty and capacity to ensure consumer privacy, and an equal responsibility to deliver strategically planned, high-performing, cost-effective programs. Therefore, data are also essential to local government energy efficiency program implementers and administrators. In particular, local governments, both those in energy efficiency partnerships with utilities and regional energy network administrators, need to know whether a customer has received incentives for participating in a particular energy efficiency

¹ Across California, cities, counties, associations and councils of government, special districts, and non-profit organizations that support government entities are members of the LGSEC. Each of these organizations may have different views on elements of these comments, which were approved by the LGSEC’s Board.

program so customers are not accessing the same incentives twice. Some energy efficiency programs operated by local governments involve incentives.

The newly created Regional Energy Networks (“RENs”) have programs that drive customers to utility incentives. To date, the utilities have not provided any information for projects which have received incentives and for which the RENs have had a role with the customer (e.g., SoCalREN financing programs, SoCalREN public agency technical support). This data is necessary for any meaningful impact evaluation of REN programs.

Local governments also need to be able to review information and details about their own energy usage data. In Southern California, some local governments are participating in the Enterprise Energy Management Information System managed by the County of Los Angeles. Through this program, local governments are pooling resources in managing their energy use. Yet the data for many of these local governments, all of whom have authorized that their usage data be sent to the County of Los Angeles, are not being transmitted as required.

These types of data transfer issues are important to the day-to-day effectiveness of energy efficiency programs. The LGSEC concurs with MCE that the Commission should either resolve this issue in the instant proceeding, or designate a venue where it will be resolved in the near future.

August 15, 2014

Respectfully submitted,



Jody S. London

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SUSTAINABLE ENERGY COALITION
P.O. Box 3629
Oakland, CA 94609