

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

Application of Southern California Edison  
Company (U338E) for Approval of Energy  
Efficiency Rolling Portfolio Business Plan.

And Related Matters

Application 17-01-013  
(Filed January 17, 2017)

Application 17-01-014

Application 17-01-015

Application 17-01-016

Application 17-01-017

**FINAL COMMENTS OF THE LOCAL GOVERNMENT  
SUSTAINABLE ENERGY COALITION**

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For the Local Government Sustainable  
Energy Coalition (LGSEC)

Dated: September 25, 2017

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

Application of Southern California Edison Company (U338E) for Approval of Energy Efficiency Rolling Portfolio Business Plan.	Application 17-01-013 (Filed January 17, 2017)
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**FINAL COMMENTS OF THE LOCAL GOVERNMENT  
SUSTAINABLE ENERGY COALITION**

Pursuant to the August 4, 2017 Administrative Law Judge (ALJ) Ruling providing leave for parties to provide final comments in this proceeding<sup>1</sup>, the Local Government Sustainable Energy Coalition (LGSEC) presents these final comments urging the Commission to adopt the proposed LGSEC Statewide Local Government Program Administration Business Plan<sup>2</sup> (LGSEC BP Proposal) as filed and discussed throughout this proceeding. These final comments further explain issues raised and explored in the record to date as well as supplement the existing record to support Commission authorization of 1) the new statewide local government program as proposed, 2) the Local Government Commission (LGC) as a new program administrator assigned to the new statewide local government program, and 3) the funding requested for the LGSEC BP Proposal.

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<sup>1</sup> August 4, 2017 ALJ Ruling Clarifying July 25, 2017 Ruling and Denying, In Part, PG&E’s Motion to Amend its Application, pp. 2 & 8. “...we are seeking from parties is a round of final comments and reply comments, intended to allow parties to wrap up any additional subjects not already covered and/or to supplement the record in this proceeding with more comprehensive comments on the full breadth of the proceeding issues.”

<sup>2</sup> See *Motion of the County of Los Angeles, on Behalf of Southern California Regional Energy Network for Approval of its Energy Efficiency Rolling Portfolio Business Plan and Local Government Sustainable Energy Coalition Statewide Local Government Program Energy Efficiency Business Plan Proposal (LGSEC BP Proposal)*, January 23, 2017, Attachment B.

LGSEC's BP Proposal was submitted on January 23, 2017 to build on current successes and solve significant problems currently impacting local government programs. These comments focus on how decentralized IOU energy efficiency administration compromises the accuracy, consistency, and availability of energy efficiency metrics, but can be remedied. As detailed by LGSEC throughout this proceeding, these problems are largely rooted in both the uncoordinated and inaccessible administration of data, and in inconsistent and unpredictable administration of contracts (for example, scope, duration, budgets, eligibility, rules, reporting, lack of coverage, delays).<sup>3</sup> LGSEC's filings in this proceeding describe these problems associated with local government program contracts in detail. In these comments, LGSEC takes the opportunity to clearly summarize complex metrics and data issues and to urge the Commission to address them by adopting LGSEC's BP Proposal.

These comments provide updated support for the initial showing that LGC, as an existing statewide non-profit organization of local government members, is the best prospective program administrator with the independence, proficiency and incentive to provide the statewide consistency through a statewide local government energy efficiency program administration. As LGSEC has pointed out, an independent, third party, non-profit program administrator is needed to replace the current unorganized, disaggregated and inefficient investor-owned utility (IOU) program administrations and remedy the problems that resulted. These include, but are not limited to, unilateral utility budget decisions from year to year, different contract scope, terms, conditions, and budgets for same or similar programs, lack of coordination with local government budget processes and project timelines and data gathering and dissemination protocols that differ from utility to utility. The current

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<sup>3</sup> See *Response of the Local Government Sustainable Energy Coalition to the April 14, 2017 Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judges*, May 15, 2017, Attachment, pp.9-15.

IOU local government program administrations are the very definition of inconsistency when compared to one another, as we have pointed out in prior pleadings. Moreover, no single IOU would be appropriate to administer this program given the inherent conflict between IOU incentives to maximize shareholder value and maintain energy efficiency program market share and incentives to enable and support local government energy efficiency programs. In contrast, LGC and the participating local governments are public entities working for the public, have lower overheads in part due to the absence of shareholders or other profit imperatives, offer broad constituent and societal benefits with greater accountability to the public, local governing authorities, and the Commission.

These final comments also supplement the record in this proceeding to highlight how the LGSEC BP Proposal to establish statewide availability of an energy use data access platform modelled on the UCLA Energy Atlas is the only proposal in this proceeding that targets the Commission's Common Metrics initiative for local government energy efficiency programs on a statewide basis.<sup>4</sup> SoCalREN, BayREN, TriCoREN, MCE and the IOUs all address proposed Common Metrics for the Public Sector. However, these entities can only implement common metrics within of each entities' respective service territories. A statewide administration dedicated to local government energy efficiency program common metrics is necessary to expand these efforts and provide consistent application across California, given the disparity between service areas and associated complexity that exists today. Specifically, the LGSEC BP Proposal will fill the gap in baseline, goals (targets) and savings potential data by replicating the level of access to existing customer energy use information and the public

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<sup>4</sup> The Commission initiated the energy efficiency Common Metrics initiative through action in this proceeding (May 10, 2017 *ALJ Ruling Seeking Comment on Energy Efficiency Business Plan Metrics*, A.17-01-013 and related matters) and in the parallel policy rulemaking proceeding (R.13-11-005) following the filing and consolidation of proposed energy efficiency business plans in January, 2017.

energy use data platform in Northern California that is now only available with the UCLA Energy Atlas. The LGSEC BP Proposal would use both these data access tools, public use platform and the proposed local government program inventory of existing and future contracts in all IOU service territories to measure California’s SB350, SB32 and AB802 policy outcomes. Just as the UCLA Energy Atlas does today, the new energy use data platform will utilize the existing data access rules that provide for research institutions to receive account-specific customer energy use data directly from the IOUs and make it available to local governments while preserving customer confidentiality under the existing rules.<sup>5</sup> The LGSEC BP Proposal is designed to make at least this level of access available to hundreds of jurisdictions in all four IOU service territories with Commission-authorized funding. Today, this level of access is limited to only those local jurisdictions located in Southern California covered by the UCLA Energy Atlas. The goal of the LGSEC BP Proposal is to operationalize the Commission’s new common metrics initiative as well as a range of local government programs, including energy efficiency.

**I. LGC as Statewide Local Government Program Administrator Can Solve Significant Problems for the Commission, IOUs and Local Governments and deliver Common Metrics**

The LGC work contemplated under the LGSEC BP Proposal is an essential component in a comprehensive strategy to coordinate opportunities, assistance, and funding from numerous sources to enable local governments to meet California’s energy and climate goals, such as SB 350. This strategy leverages ratepayer dollars with other sources of funding and investments. It is a natural companion to LGC’s current statewide leadership in local

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<sup>5</sup> *Decision Adopting Rules to Provide Access to Energy Usage and Usage-related Data While Protecting Privacy of Personal Data*, D.14-05-016 (May 5, 2014), Findings of Fact 38, 40, 41, 42, 43, 44, 45, 46, pp.144-147

energy and climate issues documented in earlier filings in this proceeding.<sup>6</sup> LGC’s activities since the LGSEC BP Proposal was filed in January illustrate this point further. LGC has added new technical assistance to local government energy efficiency and sustainability activities, funded by a variety of different agencies. The following examples demonstrate how LGC is integrating energy efficiency with comprehensive climate solutions at the local level:

- **Transformative Climate Communities (TCC)** LGC is providing technical assistance on behalf of the Strategic Growth Council to disadvantaged communities in Fresno, Los Angeles, and the Inland Empire to develop proposals for implementation grants that integrate affordable housing, active transportation, urban greening, water and energy efficiency, waste diversion, and other eligible projects. TCC is part of the California Climate Investments program, which is funded by cap and trade.
- **Affordable Housing and Sustainable Communities (AHSC)** As part of a team under the Strategic Growth Council (SGC) and Southern California Association of Governments (SCAG), LGC helped city, county, and regional agencies and developers prepare successful AHSC proposals for transit-oriented development, affordable housing, and sustainable transportation projects. Energy efficiency potential through, for example, “beyond code” building, zero net energy and climate action plan goals arises in this context.
- **Active Transportation Resource Team Technical Assistance** LGC, in partnership with Rails-to-Trails Conservancy is assisting disadvantaged communities to access funding from the State Active Transportation Program for infrastructure, planning, and programs to support walking and bicycling. This program demonstrates another approach to leveraged funding that has application to energy efficiency programs as well.

Given the ambitious goals of SB 350 and SB32, the ability for local governments to deliver on-the-ground strategies across sectors is more important than ever. Without a comprehensive strategy that addresses data and contracting issues<sup>7</sup>, local government energy efficiency efforts in California will continue to be underutilized and underreported. LGSEC urges the Commission approve LGC as program administrator for the new statewide local government program outlined in the LGSEC BP Proposal.

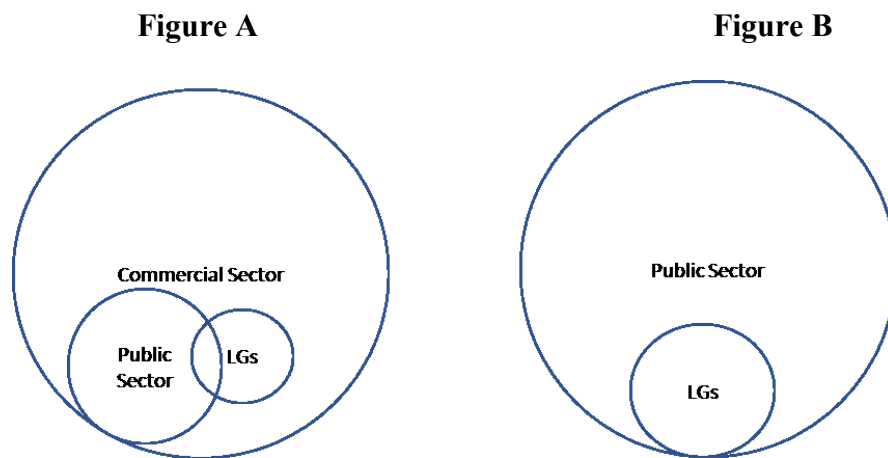
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<sup>6</sup> LGSEC BP Proposal, Appendix A.

<sup>7</sup> See *Response of the Local Government Sustainable Energy Coalition to the April 14, 2017 Scoping Memo and Ruling of the Assigned Commissioner and Administrative Law Judges*, May 15, 2017, Attachment, pp. 9-15.

## II. Uncoordinated Public Sector and Local Government Program IOU Metrics and Data

Over the course of this proceeding, the severity of data issues associated with the Public Sector and local government programs has become more apparent. Parties and stakeholders have discussed and acknowledged widespread confusion over how to properly categorize, define and capture Public Sector and local government metrics.<sup>8</sup> IOU filings<sup>9</sup> make clear that each IOU has different approaches to categorizing the Public Sector and local government metrics. The IOU approaches include reporting these metrics under the Commercial Sector or reporting all local government metrics under the Public Sector as illustrated in Figure A and Figure B below:



Neither of these approaches are accurate. Local governments are implementing programs that are currently impacting multiple sectors, for which credit is often attributed under the wrong sector or not attributed at all (e.g. financing residential energy upgrades, retrofits to transportation, wastewater and hospital facilities, benchmarking commercial

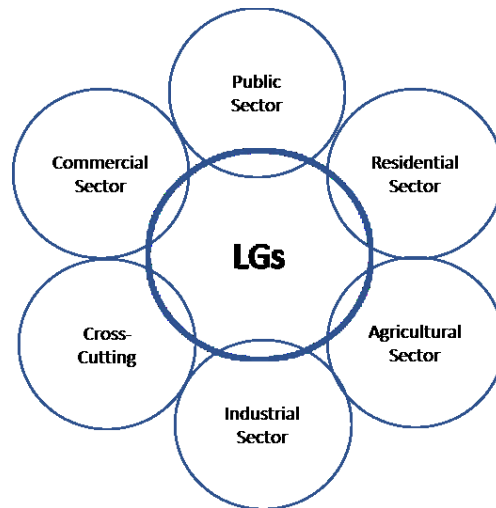
<sup>8</sup> See *Response of the Local Government Sustainable Energy Coalition to the May 10, 2017 Administrative Law Judge Ruling Seeking Comment on Energy Efficiency Business Plan Metrics*, July 14, 2017, Attachment, pp.1-3.

<sup>9</sup> See *Comments of the Local Government Sustainable Energy Coalition to the July 14, 2017 Revised Metrics Filings*, July 24, 2017, pp. 3-5.

buildings, developing reach codes, training building professionals, conducting public education).<sup>10</sup>

The LGSEC BP Proposal asserts that hundreds of local governments in California have already exhibited leadership and innovation in energy efficiency and emission reductions by adopting climate action plans and policies, and implementing programs that help public and privately-owned facilities owners undergo energy upgrades. With the right resources, local governments stand ready to provide greater impact to all sectors. A more effective approach to capturing broad local government impacts is to ensure relevant metrics are reported under the appropriate sector as illustrated in Figure C below.

**Figure C**



While the IOUs recognize the problem, it does not appear that the IOUs have a clear understanding of the work local governments are doing. Current, uncoordinated IOU processes lead to both misreported and underreported Public Sector and local government outcomes. In fact, local government program contracts often allow spending in various

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<sup>10</sup> The August 25, 2017 Proposed Decision in R.13-11-005 Adopting Energy Efficiency Goals for 2018-2030 acknowledges that the post-2017 Potential study does not include energy efficiency potential estimates for the Public Sector or non-investor owned utility program administrators' service areas.



sectors, but reporting is often limited to IOU incentives for publicly-owned buildings, which represents only a small fraction of the impact local governments are already making in energy efficiency. Local governments face reluctance from IOUs when attempting to ensure these contributions are recorded. The failure to properly account for Public Sector and local government metrics has misrepresented local government cost-effectiveness for years and still presents real challenges to the Commission gaining accurate reporting and in turn, demonstrating outcomes that meet new California energy efficiency goals.

### **III. Local Government Programs Struggle to Access IOU Data**

LGSEC urges the commission to authorize the LGSEC BP Proposal to enable local governments to be more proactive in producing common metrics data across all sectors in which they participate. This work requires local governments to have better access to energy use data. Data access is an on-going struggle. Obtaining even very limited data often requires a significant and time-consuming administrative effort for each local agency. Often public disclosure is restricted for even limited available data.

For example, local governments in Pacific Gas & Electric Company's (PG&E) service territory report that PG&E will share data, but typically only at a very high level and only for customer sectors that are expressly served in the local government program contract. If a local government program doesn't serve commercial customers, they will not have access to data related to commercial customer energy use without a lengthy data request process. It is virtually impossible for local governments to access information about specific residential or commercial customers, even at the neighborhood level, making it very difficult to tailor energy efficiency programs, report results at the jurisdictional level or prepare and report their

GHG emissions inventories.<sup>11</sup> Likewise, local government program managers supporting residential upgrades may have no ability to know whether their customers have completed an IOU incentive process and therefore cannot know with certainty what the reported, expected energy savings are for their own project. To obtain information, local government programs have created additional work-around procedures to gather information directly from customers, using customer consent forms or self-reporting or from contractors. These additional steps burden all concerned, making the program more complicated and less desirable for local governments, customers and possibly making the resulting data less reliable.

Local governments not only need data to implement and report on their energy efficiency programs. They also need local energy usage data to establish and monitor other jurisdictional mandates, including but not limited to, climate actions plans, environmental reviews, GHG emissions inventories, land use planning and permitting. While most climate action plans utilize aggregated energy use data, current access restrictions prevent auditing and verification of data sources and quality by local governments and the process to obtain aggregated data is no less onerous and often lengthy. Delays in plan completion for months are common for this reason. Likewise, the ability to customize aggregated data is limited. Further, for those with jurisdictional boundaries that include multiple IOU territories, it is very challenging to standardize data fields across IOUs, given that today, each IOU has created its own separate processes, formats and protocols.

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<sup>11</sup> Local Governments have worked diligently for at least two years in the Energy Data Access Committee (EDAC) to remedy the problem that the privacy/data aggregation rules prevent preparation and reporting of Greenhouse Gas (GHG) Inventories and other local government programs activities within a significant number of jurisdictions. Significant analysis of this has been performed by the IOUs and local governments for the EDAC. However, no consensus solution has resulted to date and various proposals for future rule changes continue to be discussed in that forum.

In all cases, local governments must complete some form of non-disclosure agreement to access data. These agreements in turn require significant and onerous IT and legal safeguards to protect customer confidentiality under the current rules. Local agencies must contend with compliance with non-disclosure agreements on the one hand and their own responsibilities to release public records under various circumstances and ordinances. When IOUs do not differentiate and label specific data as “confidential under the 15/15 rule”, local governments must bear the burden to audit or otherwise screen data making disclosure judgments impossible without additional administrative, technical and legal review.

The LGSEC BP Proposal would largely relieve the limited budgets and staffing of the IOUs and hundreds of cities and counties from undergoing individual data access requests and management processes while reducing the risk of exposing sensitive data. The LGSEC BP Proposal utilizes the alternative mechanism set forth in the current rules that allow qualified academic research institutions to gain access to raw data while maintaining privacy and disclosure restrictions.<sup>12</sup> Clearly, this strategy is essential for timely and comprehensive data access and publication of energy efficiency common metrics performance indicators.

**IV. Creating an energy use database and public access portal based on the UCLA Energy Atlas model will enable Local Governments to demonstrate performance results using Common Metrics for each sector.**

A significant feature of the initial phase of work proposed by LGSEC is the implementation of statewide access to an “Energy Atlas” modelled on UCLA’s Energy Atlas and available to all jurisdictions not currently served. This tool is a streamlined, third party approach to accessing and analyzing energy use data. This strategy replicates the successful development

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<sup>12</sup> *Decision Adopting Rules to Provide Access to Energy Usage and Usage-related Data While Protecting Privacy of Personal Data*, D.14-05-016 (May 5, 2014), Findings of Fact 38, 40, 41, 42, 43, 44, 45, 46, pp.144-147.

of the interactive, web-based Energy Atlas for Los Angeles County and Southern California by the California Center for Sustainable Communities at the Institute of the Environment and Sustainability, University of California, Los Angeles (UCLA.) As described in Attachment A, UCLA's Energy Atlas is a public tool that provides a single point of public access to essential information for municipal and regional energy efficiency, climate change planning and implementation of state regulations. The Energy Atlas platform uses a relational database to organize, anonymize and aggregate data from utilities and public agencies to provide a unique and comprehensive view of building energy usage from region-wide to neighborhood scales. See Attachment 1. It is already equipped to translate building energy usage data into standardized emission reduction data, which aligns with the goals of the Commission's Common Metrics and the recently adopted Interim Greenhouse Gas (GHG) Adder.<sup>13</sup> Local governments in Southern California have access to aggregated energy consumption data through the Energy Atlas, with a possibility of custom analytics, without the need for large time or financial investments and without the burden of managing sensitive data. Statewide access to an Energy Atlas tool will allow LGC to conduct the data analysis needed to establish local government program common metrics baselines and targets within the appropriate sectors.

**V. The LGSEC BP Proposal Implements Comprehensive Strategies to Solve Data as well as Common Metrics Issues Now**

While the problems summarized above have existed for many years, the IOUs have not resolved them. This is not surprising given that local governments programs are just one of many priorities for the IOUs and that the work that is necessary to resolve these issues is a major undertaking. Resolving these issues requires an organized process to gather data from

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<sup>13</sup> D.17-08-022.

the four IOUs to gain a clear and complete picture of what existing local government programs are doing in order to set appropriate sector-level metrics, baselines, and targets. LGC is the only prospective program administrator that has demonstrated a commitment to compiling this information on a statewide basis through its existing LGP inventory and data access proposals. The Commission should authorize LGC to implement the LGSEC BP Proposal as the only appropriate and comprehensive solution proposed in this proceeding to timely resolve complex data issues.

## **VI. Conclusion**

For all the foregoing reasons, LGSEC respectfully requests that the Commission adopt the LGSEC BP Proposal as filed, including the authorization of a new statewide local government program, LGC as the program administrator for the new statewide local government program and the full LGSEC BP and associated budget as described and requested by LGSEC in the record in this proceeding.

Respectfully submitted,



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For the Local Government Sustainable  
Energy Coalition (LGSEC)

Dated: September 25, 2017

**ATTACHMENT 1**

**ENERGY ATLAS**

**UNIVERSITY OF CALIFORNIA, LOS ANGELES**

**CALIFORNIA CENTER FOR SUSTAINABLE COMMUNITIES**

**INSTITUTE OF THE ENVIRONMENT AND  
SUSTAINABILITY**

## UCLA Energy Atlas Overview

California Center for Sustainable Communities, Institute of the Environment and Sustainability, UCLA

The California Center for Sustainable Communities at the Institute of the Environment and Sustainability, UCLA, has developed an interactive web based Energy Atlas for Los Angeles County and Southern California providing essential information for municipal and regional energy efficiency, climate change planning and implementation of state regulations.

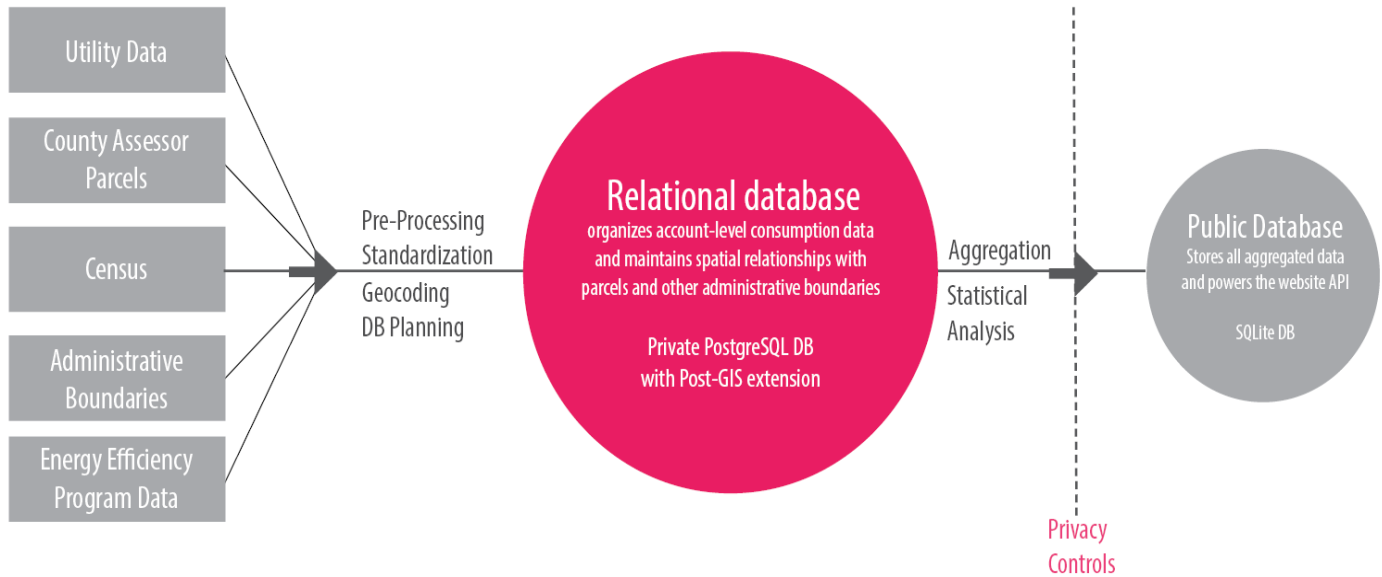
By combining new ways to view information through an interactive web atlas, using account-level billing data and related building attributes, the Energy Atlas enables decision-makers to target energy planning actions and public investments that maximize greenhouse gas reductions and ensure social equity. Energy Atlas data, mapping and analyses bring new knowledge and understanding of the relationships between energy use, socio-demographic characteristics, building characteristics, and land use.

The relationships demonstrated by the Energy Atlas are the result of data cleaning, standardization and integration processes that match individual utility account addresses to County Assessor parcel information. The Energy Atlas can then connect building type, size, vintage and other attributes associated with individual utility accounts. This is useful for understanding local energy consumption patterns within specific building and socio-demographic context necessary for data-driven policy and planning.

A web-based interactive platform allows for the public dissemination of aggregated privacy-protected information on building energy consumption (electricity and natural gas), combined BTU, greenhouse gas emissions and socio-demographic information for a variety of different geographic areas of interest. UCLA assures a highly secure environment for storage of confidential data and CCSC has established protocols specifically for the protection of energy data. The Atlas is available at [www.energyatlas.ucla.edu](http://www.energyatlas.ucla.edu).

This public tool allows local governments, utilities and other interested parties to understand building energy use in Southern California from region-wide to neighborhood scales.

**Contact:** Dr. Stephanie Pincetl, *CCSC Director and Professor* - [spincetl@ioes.ucla.edu](mailto:spincetl@ioes.ucla.edu)  
For more information, please visit [www.ioes.ucla.edu/ccsc](http://www.ioes.ucla.edu/ccsc).

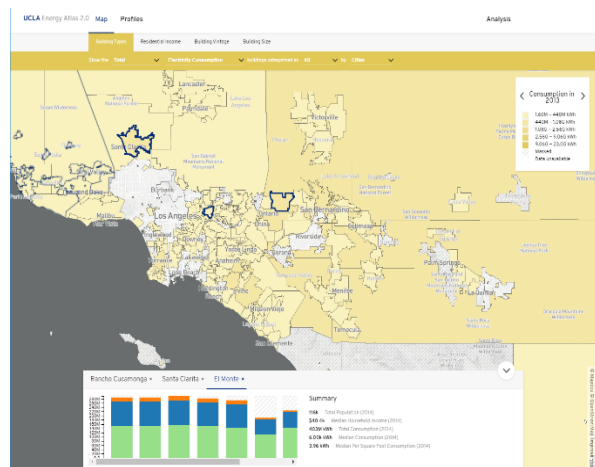


Energy Atlas Database Process

## Energy Atlas Project Components

The interactive Energy Atlas includes a suite of interrelated products that describes building energy use across Los Angeles County and Southern California.

- Building Energy Analyses:** The Energy Atlas project develops building energy use baselines from address-level billing data to determine customer-level energy consumption by land use type, and building attributes. The Atlas develops insights about energy use patterns (such as the relationship between building age, size and energy intensity across geographies). The baseline established from 2006 (in Los Angeles County) enables analyses of change over time and by specific characteristics. The Atlas now includes all IOU territories in Southern California for 2010 through 2014.
- Interactive Map of Building Energy Consumption and GHG Emissions:** An interactive map forms the basis for the public facing Atlas tool. Data is displayed maintains State-mandated data confidentiality, while providing neighborhood-, city-, county-, and COG-specific energy consumption. Pull down tabs enable comparisons among different geographies, building types, sociodemographic characteristics and energy use. The Atlas can generate downloadable tables and charts showing, for example, building energy by size of building to establish energy disclosure





thresholds for the commercial sector. In compliance with PUC privacy regulations, some geographies will be masked under various data queries.

- **Energy Efficiency Program Data:** Energy Efficiency program data is integrated in the Atlas analytic capacity. With address level billing data going back to 2006, CCSC is developing a deeper and more specific understanding of the effectiveness of EE programs by program type, sector, building type and sociodemographic characteristics. Further EE data will be integrated over time and across utilities.
- **CalEnviroScreen:** The Energy Atlas incorporates residential energy consumption data organized by CalEnviroScreen designated disadvantaged communities to assist with local prioritization and planning.
- **In-Depth Research and Planning Contributions:** The Energy Atlas address level data serves as the basis for research on such critical questions as: utility grid vulnerabilities, community solar heating potential, energy efficiency, and the potential for advanced energy community deployment in disadvantaged neighborhoods.
- **Communications and Outreach:** CCSC works with various partners including the Southern California Regional Energy Network, The Energy Coalition, the Los Angeles Regional Collaborative for Climate Action and Sustainability, the Local Government Sustainable Energy Coalition, and the Southern California Council of Governments. CCSC provides workshops, webinars and tutorials on using the Atlas, as well as limited specific analyses for local governments upon request.

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