on the January 13, 2023 Workshop on Energy Data Modernization and Analytics

Additional submitted attachment is included below.

**STATE OF CALIFORNIA ENERGY RESOURCES
CONSERVATION AND DEVELOPMENT COMMISSION**

In the Matter of: *Energy Data Modernization and Analytics Workshop*	Docket No. 22-MISC-03 RE: Energy Data Modernization and Analytics Workshop

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON THE JANUARY 13, 2023 WORKSHOP ON ENERGY DATA
MODERNIZATION AND ANALYTICS**

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January 27, 2023

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In the Matter of:

Energy Data Modernization and Analytics Workshop

Docket No. 22-MISC-03

RE: Energy Data Modernization and Analytics Workshop

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S COMMENTS
ON THE JANUARY 13, 2023 WORKSHOP ON ENERGY DATA
MODERNIZATION AND ANALYTICS**

The California Community Choice Association[1] (CalCCA) submits these Comments in response to the January 13, 2023 *Workshop on Energy Data Modernization and Analytics* (Workshop).

I.   THE COMMISSION SHOULD MAKE INTERVAL AND BILLING DATA AVAILABLE FOR ALL STAKEHOLDERS TO ENABLE BETTER FORECASTING, INCREASED ELECTRIFICATION, AND IMPROVE PENETRATION OF DEMAND RESPONSE

At the Workshop, California Energy Commission (Commission) staff described the data that they are authorized to collect under Title 20, section 1353 of the California Code of Regulations.[2] The data includes billing and interval-level gas and electric meter data from all retail meters, along with address, rate schedule, North American Industry Classification System

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[1]   California Community Choice Association represents the interests of 24 community choice electricity providers in California: Apple Valley Choice Energy, Central Coast Community Energy, Clean Energy Alliance, Clean Power Alliance, CleanPowerSF, Desert Community Energy, East Bay Community Energy, Energy For Palmdale's Independent Choice, Lancaster Choice Energy, Marin Clean Energy, Orange County Power Authority, Peninsula Clean Energy, Pico Rivera Innovative Municipal Energy, Pioneer Community Energy, Pomona Choice Energy, Rancho Mirage Energy Authority, Redwood Coast Energy Authority, San Diego Community Power, San Jacinto Power, San José Clean Energy, Santa Barbara Clean Energy, Silicon Valley Clean Energy, Sonoma Clean Power, and Valley Clean Energy.

[2]   *Commissioner Workshop on Energy Data Modernization and Analytics, January 13, 2023*, at slide 6: https://efiling.energy.ca.gov/GetDocument.aspx?tn=248241&DocumentContentId=82554.

code, and information on whether the customer participates in energy efficiency or Net Energy Metering programs.

CalCCA lauds the Commission for its efforts to compile these data, and supports making anonymized versions available to all stakeholders. These data would be useful for a variety of planning and operational purposes. A partial list of community choice aggregator (CCA) use cases for the data is below. This does not capture the complete set of use cases, but rather is intended to provide examples of possible value that the data could unlock.

- Analyze how load varies with census-tract level weather and population growth, thus improving accuracy of load forecasting. This is especially important for CCAs, as many have small service territories and have loads sensitive to local weather conditions.

- Calculate accurate bills under various rate designs, including changing time-of-use levels or real-time pricing. CalCCA notes that having accurate interval data is crucial to testing the effects of real-time pricing for the Commission's Load Management Standards program.

- Aid in the design of demand response programs, by identifying "peaky" census tracts with high loads or areas with currently low penetration of demand response programs such as Emergency Load Reduction Program, which allows CCAs to estimate where and to what extent load reductions due to demand response might be possible.

- Identify areas to fund electric vehicle charging stations.

II. FOR RESIDENTIAL DATA, THE COMMISSION SHOULD PROVIDE DATA AT THE INDIVIDUAL CUSTOMER LEVEL MAPPED TO BLOCK GROUP, WITH THE ADDRESS REMOVED

Although individual customer data is necessary for the objectives listed above, preserving personally identifiable information (PII) such as address is crucial. To address this concern, the Commission could simply redact address information from the data and assign each customer's data an anonymous "key" that uniquely identifies a given combination of Premise ID (a fixed physical meter) and a Service Agreement ID (SAID) (an agreement that changes when the customer moves out or goes on a different rate schedule). For example, a residential meter at a

point in time could be identified as Premise ID 11111111, SAID 0123456. When that customer

moves out or changes rate schedule, it could be identified as Premise ID 11111111, SAID

0123457. These are not the "real" SAIDs that the utilities use to perform billing, but instead

automatically generated ones that would not allow mapping to any other data sources.

The Commission should also provide the census block group based on the customer's

address. This information is crucial for mapping to local climate conditions, as well as making

decisions about where to fund local infrastructure projects such as EV charging stations. A

typical block group consists of 600 to 3,000 people,[3] and thus it would not be possible to match a

given address with electric usage from this data.

The example table below shows how the Commission could structure these records, for

two unique Premise IDs in two different block groups. Each Premise ID has changed SAID once

(due to move-outs).

Anonymized Premise ID	Anonymized SAID	Block Group	Address
11111111	0123457	12345	REDACTED
11111111	0123458	12345	REDACTED
11111112	0123461	12346	REDACTED
11111112	0123462	12346	REDACTED

III. **FOR COMMERCIAL AND INDUSTRIAL CUSTOMER DATA, THE COMMISSION SHOULD FOLLOW A SIMILAR PROTOCOL AS WITH RESIDENTIAL DATA, BUT WHERE NECESSARY IMPLEMENT THE 15/15 RULE TO ADDRESS CONCERNS ABOUT IDENTIFYING INDIVIDUAL CUSTOMERS**

If adopting the protocol described above for residential does not reveal PII such as

address for commercial and industrial customers, the Commission should follow it. However,

CalCCA recognizes that large customers such as factories and refineries may be the only one in a

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[3]   United States Census Glossary: https://www.census.gov/programs-surveys/geography/about/glossary.html

given census block group, and thus could be identified by their individual load profile. For these customers, the Commission could use the existing "15/15 Rule" to mask customer data. The 15/15 Rule:

> "generally provides that aggregated or anonymized customers specific information must be made up of at least 15 customers and a single customer's load must be less than 15% of an assigned category. If the number of customers in the compiled data is below 15, or if a single customer's load is more than 15% of the total data, categories must be combined, or non-conforming customer information must be removed before the information is released. In this case, there are instances in which the ALJ Ruling Appendix specifies that customer demand be identified by locational parameters such as zip code and census tract, which would not allow for further aggregation of implicated data to meet the 15/15 Rule."[4]

To follow the rules above, the Commission could aggregate the data on a higher level than block group. For example, the Commission could use zip code or the sum across several census tracts until the 15/15 rule is satisfied.

IV. CONCLUSION

CalCCA looks forward to further collaboration on this topic.

Respectfully submitted,

Evelyn Kahl,
General Counsel and Director of Policy
CALIFORNIA COMMUNITY CHOICE
ASSOCIATION

January 27, 2023

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[4] Rulemaking 20-01-007. *Southern California Gas Company's (U 904 G) and San Diego Gas & Electric Company's (U 902 G) Joint Motion For Leave To File Under Seal Specifically Identified Portions Of Their Responses To The Revised Administrative Law Judge's Ruling Seeking Data From California's Gas Utilities*, at 2.