

CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov



August 18, 2016

Ms. Caroline Winn
Chief Energy Delivery Officer

Mr. Daniel Skopec
Vice President of Regulatory Affairs

San Diego Gas & Electric
8326 Century Park Court
San Diego, CA 92123-4150

Dear Ms. Winn and Mr. Skopec:

The California Energy Commission (Energy Commission) would like to notify San Diego Gas & Electric (SDG&E) of the opportunity to participate in survey research that will provide information on commercial energy use and meet SDG&E's data collection obligations to support energy demand forecasting work at the Energy Commission. All major California utilities are required under state law (California Code of Regulations, Title 20, section 1343)¹ to provide the Energy Commission with a commercial sector survey and related analyses elements every four years. In lieu of meeting these obligations through a utility-sponsored effort, section 1343(f) permits a utility to join certain types of Energy Commission-sponsored research projects.

The Energy Commission has spending authority of \$13 million to fund the California Commercial End-Use Survey (CEUS), a survey of electricity and natural gas customers of the state's six largest energy utilities. The design phase of the CEUS will begin in September and will include developing representative samples of commercial facilities owned or operated by electricity and natural gas customers in the San Diego Gas & Electric service area. A similar letter has been sent to SoCalGas requesting their participation to ensure coverage and access to common infrastructure between the two Sempra Energy companies.

The purpose of this letter is to invite SDG&E to participate in the CEUS and provide certain data regarding its commercial electricity and natural gas customers. This request necessitates submitting customer-specific information that your utility possesses as a result of your billing functions, including, but not limited to:

- Complete electricity and natural gas customer records needed to design, select, and properly weight an agreed upon comprehensive sample of the commercial sector.
- Individual billing and energy consumption histories with all available detail for sampled accounts for electricity and natural gas for each calendar year over the term of the contract, and for up to one year after the contract concludes.

Additionally, Energy Commission staff will need assistance from SDG&E staff and major account representatives to maximize customer participation in the survey.

¹ All references hereafter are to Title 20 of the California Code of Regulations unless otherwise specified.

Ms. Caroline Winn
Mr. Daniel Skopec
Page 2
August 18, 2016

Since these data are by their nature customer-specific, the items qualify for the automatic designation of confidential records as described in the confidentiality provisions of the Energy Commission's data collection regulations (Section 2505(a)(5)(B)(1)). Energy Commission staff will assist SDG&E in obtaining complete confidentiality protection for information used in the CEUS.

The Energy Commission will provide the following support to ensure the successful administration of this study:

- All required funding for data collection and analysis in SDG&E's service areas.
- Staff resources for contract administration and management.

Furthermore, SDG&E staff will be invited to work together with the Energy Commission and ADM Associates, Inc. to refine project objectives and develop the commercial survey design and implementation plan. The Energy Commission will share a comprehensive set of contract deliverables with SDG&E, as well as project results for its customers.

To request to participate in the CEUS, please respond to me in writing no later than 60 days from the date of this letter. In your response, please indicate that you are requesting to participate in the CEUS in lieu of the commercial sector requirements contained in section 1343(b)–(e), and that you agree to comply with the participation requirements in this letter and in section 1343(f)(1). After your request to participate in the CEUS is approved, Energy Commission staff and SDG&E will work together to develop a research plan, which will include more detailed participation and schedule requirements. We look forward to working with you to develop this research plan.

I hope for your cooperation in conducting the CEUS to provide valuable data for all concerned. If you have questions about this request, please contact Mark Ciminelli, Demand Analysis Office, at (916) 654-4765.

Thank you for your cooperation in this important project.

Sincerely



Robert P. Oglesby
Executive Director

cc: Ms. Cyndee Fang
Rates Strategy and Analysis Manager

Mr. Ken Schiermeyer,
Forecasting Manager

San Diego Gas & Electric
8326 Century Park Court
San Diego, CA 92123-4150

Mark Ciminelli
Demand Analysis Office



Scott Crider
Vice President
Customer Services

8330 Century Park Court, M.L. CP33B
San Diego, CA 92123

September 15, 2016

Mr. Robert Oglesby
Executive Director, California Energy Commission
1516 9th Street, Ms-39
Sacramento, CA 95814-5512

RE: Energy Commission Invitation Letter to Participate in an Energy Commission Sponsored CEUS Project

Dear Mr. Oglesby:

In a letter from the Energy Commission to SDG&E, dated August 18, 2016, the Commission reminds SDG&E of its obligation under Title 20, Section 1343 of the California Code of Regulations to support the Energy Commission in its effort to carry out energy demand forecasting research, including a Commercial Energy Use Survey (CEUS) for the purpose of profiling commercial customers and their use of electricity and natural gas.

This regulation puts forth two ways SDG&E can fulfill its obligation: 1) by sponsoring the research itself and providing the results to the commission (Section 1343(b)-(e)) or 2) by accepting an invitation from the Energy Commission to participate in an Energy Commission sponsored research effort for the same purpose of profiling commercial customers and their energy usage (Section 1343(f)(1)).

The above referenced Energy Commission letter extends an invitation to SDG&E to participate in the CEC's 2016 CEUS under the above mentioned option 2 of Title 20 regulation, Section 1343(f)(1).

Option 2 imposes two requirements on the participant. First, the project sponsor may ask for funding from the participating utility in an amount determined by the Commission to be reasonably necessary to fulfill the data collection objectives of the research project. Second, the participating utility must provide certain customer-specific information which is necessary to carry out tasks associated with designing the survey, developing a sampling plan, and analyzing collected data.

As for the first requirement, the Commission's invitation letter states that it has spending authority of \$13 million to fund a statewide CEUS and that it has what is needed to fund data collection and analysis in SDG&E's service area. As for the second requirement, SDG&E acknowledges the need to provide customer-specific information from SDG&E's billing system for sampling design and sampling purposes. SDG&E's forecasting staff will work closely with commission staff to determine which data elements are needed and then provide these data under Title 20 regulations, Section 2505(a)(5)(B)(1), which automatically grants confidentiality for these data.

SDG&E hereby selects option 2 to fulfill its obligation, as put forth in Title 20, Section 1343(f)(1), and looks forward to working with commission staff to further the progress of the 2016 CEUS.

Sincerely,



Scott Crider
Vice President, Customer Services
San Diego Gas & Electric

cc:

Caroline Wynn, Chief Energy Delivery Officer SDG&E
Eugene Mitchell, VP State Gov. Affairs SDG&E
Dana Golan, Mgr. Customer Pricing SDG&E
Cyndee Fang, Mgr. Rate Strategy & Analysis SDG&E
Mark Ciminelli, Demand Analysis Office, California Energy Commission

STATE OF CALIFORNIA

STATE ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

[PROPOSED] RESOLUTION OF THE ENERGY COMMISSION APPROVING SAN
DIEGO GAS & ELECTRIC'S REQUEST TO USE THE DATA COLLECTION AND
ANALYSES COMPLIANCE OPTION

WHEREAS, California Code of Regulations, Title 20, Section 1343(b)–(e) requires certain Utility Distribution Companies (UDCs) to submit to the California Energy Commission (Energy Commission) survey plans, surveys, and reports relating to end-users in the residential, commercial, and industrial major customer sectors; and

WHEREAS, California Code of Regulations, Title 20, Section 1343(f), provides a data collection and analyses compliance option whereby UDCs may participate in projects that the Energy Commission identifies, including the California Commercial End-Use Survey (CEUS), in lieu of the commercial, residential, and/or industrial sector requirements of California Code of Regulations, Title 20, Section 1343(b)–(e); and

WHEREAS, pursuant to the California Code of Regulations, Title 20, Section 1343(f)(2), the Executive Director of the Energy Commission notified San Diego Gas & Electric (SDG&E) on August 18, 2016, of the opportunity to use the data collection and analyses compliance option by participating in the CEUS in lieu of the commercial sector requirements contained in California Code of Regulations, Title 20, Section 1343(b)–(e); and

WHEREAS, pursuant to the California Code of Regulations, Title 20, Section 1343(f)(3)(A), SDG&E responded in writing on September 15, 2016, to the Executive Director's notification, requesting to use the data collection and analyses compliance option and agreeing to participate in the CEUS and to provide customer-specific information from its billing system; and

WHEREAS, the Energy Commission has considered all correspondence submitted on this matter.

THEREFORE BE IT RESOLVED, that the Energy Commission approves SDG&E's request to use the data collection and analyses compliance option; and

THEREFORE BE IT FURTHER RESOLVED, that SDG&E is exempt from the commercial sector requirements in California Code of Regulations, Title 20, Section 1343(b)–(e), until four years from the effective date of this Resolution, provided that it complies

with the participation and compliance requirements in California Code of Regulations, Title 20, Section 1343(f) and in the Executive Director's August 18, 2016 notification; and

THEREFORE BE IT FURTHER RESOLVED, that the Energy Commission directs the Executive Director to take, on behalf of the Energy Commission, all actions reasonably necessary to implement this Resolution including, but not limited to:

- Notifying SDG&E that the Energy Commission approved its request to use the data collection and analyses compliance option,
- Directing staff to develop a Research Plan, which will contain detailed participation and schedule requirements and will identify the information and data that SDG&E must submit.

CERTIFICATION

The undersigned Secretariat to the Energy Commission does hereby certify that the foregoing is a full, true, and correct copy of a Resolution duly and regularly adopted at a meeting of the California Energy Commission held on October 19, 2016.

AYE:

NAY:

ABSENT:

ABSTAIN:

Cody Goldthrite
Secretariat