

## CALIFORNIA ENERGY COMMISSION

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



January 8, 2018

Ms. Valerie J. Winn  
Chief, State Agency Relations  
Pacific Gas & Electric  
77 Beale Street, B23  
San Francisco, CA 94105

Dear Ms. Winn:

Thank you for the positive response in your letter received December 13, 2017, to an invitation to participate in an Energy Commission-sponsored Commercial End-Use Survey (CEUS). The Energy Commission plans to consider for approval PG&E's request to use the data collection and analyses compliance option for CEUS participation at the January 17, 2018, Business Meeting. A copy of the resolution will be provided.

The Energy Commission looks forward to working with PG&E to refine the project objectives, develop the commercial survey design, and implement the survey data collection activities. The Energy Commission's completed research plan will contain detailed participation and schedule requirements and will identify the information and data that PG&E must submit.

Thank you for your support in this important project.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Drew Bohan'.

Drew Bohan  
Executive Director

cc: Mr. Robert Kasman, Manager, Evaluation, Management and Verification, PG&E  
Siva Gunda, Energy Commission

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Executive Director

cc: Mr. Robert Kasman, Manager, Evaluation, Management and Verification, PG&E  
Siva Gunda, Energy Commission

December 13, 2017

**VIA ELECTRONIC FILING AND  
US MAIL**

Mr. Drew Bohan  
Executive Director  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Mr. Bohan:

On April 18, 2017, Pacific Gas and Electric Company (PG&E) responded to a letter dated February 21, 2017 from the California Energy Commission (CEC) that notified PG&E of the opportunity to join a CEC-sponsored Commercial End Use Survey (CEUS), in lieu of PG&E conducting its own independent survey.

PG&E accepted that offer in its April 18, 2017 letter, conditioning its acceptance on the provision of data that were anonymized and/or aggregated, among other things. Since the submission of the acceptance letter, additional discussions have been held with the CEC and a draft protocol for conducting the CEUS has been provided to PG&E. As a result, PG&E understands that the CEC and its consultant ADM would like to receive customer-specific commercial customer data to mitigate known issues with the NAICS codes and to address concerns about the possibility of one type of commercial customer dominating the selected sample.

Given these concerns, PG&E now agrees to provide detailed, customer-specific data to the CEC's consultant to advance this important research project. To do this, PG&E will need to conduct appropriate security reviews of the recipient(s) computer systems, execute a non-disclosure agreement with party receiving the data, and, if needed, file a confidentiality affidavit with the CEC to protect the data from public disclosure.

We look forward to discussing these requirements, the specific data to be provided, and an associated timeline for delivering the data. Additionally, to the extent outreach to individual customers and/or site-specific visits are needed as the study advances, PG&E would like to offer its assistance to help manage any customer concerns or questions. I will work with the CEC's attorney, Caryn Holmes, to set a mutually-agreeable time to conduct these discussions.

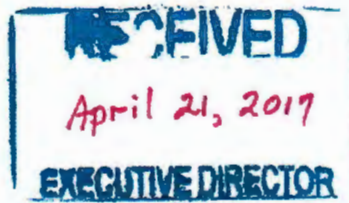
I remain the point of contact on this project for regulatory issues and I look forward to introducing to the CEC team our new technical lead for this project Robert Kasman (rekl@pge.com).

Sincerely,

/s/

Valerie J. Winn

Cc: Caryn Holmes  
Andrew Gough  
Kevin Barker



Valerie J. Winn  
Chief  
State Agency Relations

77 Beale Street, B10C  
San Francisco, CA 94105

(415) 973-3839  
(415) 973-7226 Fax  
valerie.winn@pge.com

April 18, 2017

VIA ELECTRONIC FILING AND  
US MAIL

Robert P. Oglesby  
Executive Director  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814-5512

Dear Mr. Oglesby:

*Rob,*

Thank you for your February 21, 2017 letter notifying Pacific Gas and Electric (PG&E) of the opportunity to join a California Energy Commission (CEC)-sponsored Commercial End Use Survey (CEUS), in lieu of PG&E conducting its own independent survey.

PG&E is pleased to accept your invitation to participate in the CEC CEUS and PG&E agrees to comply with the participation requirements in Section 1343 (f)(1) to the extent they are consistent with necessary protections of commercial customer privacy and confidentiality. PG&E supports the CEC's administration of the CEUS, which can provide valuable insight into how to improve commercial energy efficiency programs and support energy demand forecasting.

As part of this initiative, PG&E will collaborate with the CEC throughout the life of the CEUS on various activities, including (1) refining project objectives and developing a research plan; (2) providing commercial electric and gas data, and other data as appropriate, anonymized and/or aggregated consistent with the terms of PG&E's customer confidentiality obligations and commitments; and (3) providing additional support and review of interim/draft deliverables, as determined during the research planning phase.

We look forward to the opportunity to work closely with the CEC in the development and execution of the CEUS. To facilitate this process, PG&E's technical point of contact will be Priscilla Johnson, Energy Efficiency EM&V Commercial Lead (415-973-2401; [PXJJ@pge.com](mailto:PXJJ@pge.com)) and Valerie Winn (415-973-3839; [VJW3@pge.com](mailto:VJW3@pge.com)) for regulatory issues.

Sincerely,

  
Valerie J. Winn

cc: Mark Ciminelli

**CALIFORNIA ENERGY COMMISSION**

1518 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



February 21, 2017

Ms. Jessica Francisco, Director, CES Strategy and Operations  
Mr. Rob Kasman, Manager, EM&V  
Pacific Gas and Electric Company  
245 Market Street  
San Francisco, CA 94105

Dear Ms. Francisco and Mr. Kasman:

The California Energy Commission (Energy Commission) would like to notify Pacific Gas and Electric Company (PG&E) of the opportunity to participate in survey research that will provide information on commercial energy use and meet PG&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)<sup>1</sup> 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 the next several months and may include developing representative samples of commercial facilities owned or operated by electricity and natural gas customers in the PG&E service area.

The purpose of this letter is to invite PG&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 PG&E staff and major account representatives to maximize customer participation in the survey.

Since these data are by their nature customer-specific, they 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)).

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

Ms. Jessica Francisco  
Mr. Rob Kasman  
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February 21, 2017

Energy Commission staff will provide any assistance PG&E needs 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 PG&E's service area.
- Staff resources for contract administration and management.

Furthermore, PG&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 PG&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 PG&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. Valerie Winn, Chief, State Agency Relations  
Pacific Gas and Electric Company  
77 Beale Street, B13L  
San Francisco, CA 94105

Ms. Mary Anderson, Customer Care Program Manager and Expert  
Pacific Gas and Electric Company  
3401 Crow Canyon Road, Bldg. 414  
San Ramon, CA 94583

STATE OF CALIFORNIA

STATE ENERGY RESOURCES CONSERVATION  
AND DEVELOPMENT COMMISSION

[PROPOSED] RESOLUTION OF THE ENERGY COMMISSION APPROVING  
PACIFIC GAS AND 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 Pacific Gas and Electric (PG&E) on February 21, 2017, 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), PG&E responded on April 18, 2017 to the Executive Director's notification requesting to use the data collection and analyses compliance option on the condition that data provided would be anonymized and/or aggregated, and subsequently participated in discussions with the Energy Commission staff to understand the importance of customer specific information; and

**WHEREAS**, PG&E responded in a second letter on December 13, 2017, agreeing to provide detailed, customer specific data as outlined in the Energy Commission Executive Director's February 21, 2017 notification; and

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

**THEREFORE BE IT RESOLVED**, that the Energy Commission approves PG&E's request to use the data collection and analyses compliance option, and that PG&E is exempt from the commercial sector requirements in California Code of Regulations, Title 20, Section 1343(b)–(e), for 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 February 21, 2017 letter and that the Energy Commission directs the Executive Director to take, on behalf of the Energy Commission, all actions reasonably necessary to implement this Resolution

#### **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 July 17, 2018.

AYE:

NAY:

ABSENT:

ABSTAIN:

Cody Goldthrite

Secretariat