



NC SUSTAINABLE
ENERGY ASSOCIATION

February 12, 2013

FILED

FEB 12 2013

Clerk's Office
N.C. Utilities Commission

OFFICIAL COPY

Honorable Gail Mount
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4325

Re: North Carolina Sustainable Energy Association ("NCSEA") 2012 IRP Comments
(Commission Docket No. E-100, Sub 137)







Dear Honorable Chief Clerk and Commissioners:









On 7 February 2013, NCSEA filed its initial comments in this proceeding. In those comments, NCSEA asserted that the Commission should consider promulgating rules permitting greater access to utility-held customer energy usage data. Such rules would enable (1) academic and governmental institutions to conduct research, the results of which will help educate society about energy usage, (2) businesses to develop and roll out innovative energy usage products and services, and (3) customers to exercise greater control over their energy usage and its economic, environmental, and social impacts. NCSEA requested the Commission open a separate rulemaking docket to review and modernize, as appropriate, Commission Rule R8-51 and relevant provisions within the investor-owned utilities' codes of conduct.







NCSEA recognizes that the Commission may view NCSEA as a single stakeholder. To assure the Commission that NCSEA's request is representative of a diverse spectrum of stakeholders' desires, NCSEA has compiled the attached letters¹ for submission into the record. The letters are from academic and governmental institutions, businesses, innovation- and energy-focused membership organizations, and individuals including:

¹ The authors of the letters individualized a template provided by NCSEA. NCSEA urges the Commission to carefully review the individualized portions of each letter.

(5)
AG
7 Comm
Watson
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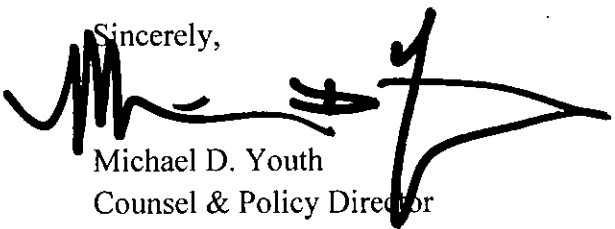
Author	Author's Title	Representing or Affiliated (Present or Past) With:
Jim Hawley	General Counsel & Senior VP, State Policy	 TechNet
Maggie Ullman	Sustainability Program Manager	
Jacqueline L. Patterson	Principal and Owner	 Sheercom <i>sustainable services for the next generation</i>
John A. Hobbes	Regional General Manager - Southeast	
Michael Regan	Associate Vice President	 EDF ENVIRONMENTAL DEFENSE FUND™ Finding the ways that work
Mandy Mahoney	Vice President	 SEEA SOUTHEAST ENERGY EFFICIENCY ALLIANCE
Shannon G. Smith	CEO	 ABUNDANT POWER Smart Capital for Clean Energy
Stephen S. Kalland	Executive Director	 NORTH CAROLINA Solar Center

Anne McKibbin	Policy Director	 CNTenergy Community Focused Innovation
Jeffrey E. Ramsdell, Ph.D, P.E.	Professor and Director of the Appalachian Energy Center	 Appalachian STATE UNIVERSITY.
Melissa McHale, Ph.D	Assistant Professor of Urban Ecology	NC STATE UNIVERSITY DEPARTMENT of FORESTRY and ENVIRONMENTAL RESOURCES 
Lucas Fishback	CEO/Founder	 plotwatt ™
John Richardson	Sustainability Officer	Town of Chapel Hill
Justin Segall	Founder and Executive Vice President	 SimpleEnergy
Philip Azar	Executive Director	 CLEAN ENERGY Durham
Kenneth N. Szymanski	Executive Director	 AANC Apartment Association of North Carolina
Tom Plant	Vice President, State Policy	AEE ADVANCED ENERGY ECONOMY
Cameron Brooks	President of Tolerable Planet Enterprises; past Vice President of Policy, Tendril	 Tolerable Planet Enterprises Tendril Inc.

Benjamin T. Shivar	Town Manager, Town of Cary	
Lawrence Steffann	Past Vice President of Product Development	Consert, Inc.
Christine E. Boyle, Ph.D	CEO of Blue Horizon Insight; Affiliate Scholar at the UNC School of Government	 BlueHorizon INSIGHT UNC School of Government
Tobin L. Freid	Sustainability Manager	 DURHAM 1 8 6 9 CITY OF MEDICINE
Stephen J. Morgan	President	clean energy solutions 
Keith G. Pehl, P.E.	USGBC North Carolina Advocacy Committee, State Subcommittee Chair	  NORTH CAROLINA

Additional letters may be filed in the future.

Sincerely,



Michael D. Youth
Counsel & Policy Director
michael@energync.org



855 El Camino Real, Suite 250 | Palo Alto, CA 94301
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February 11, 2013

FILED

FEB 12 2013

Clerk's Office
N.C. Utilities Commission

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Raleigh, NC 27603-5918

RE: Support of the Request of the North Carolina Sustainable Energy Association to the Commission to Review and Updates Rules Governing Access to Customer Energy Usage Data (Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

The Technology Network "TechNet" (www.technet.org) -- whose members include technology companies ranging from global leaders to startups committed to U.S. leadership in innovation -- writes in support of NCSEA's request that the Commission open a docket to review and modernize, where appropriate, its rules governing access to customer energy usage data. TechNet's members include leaders in Smart Grid, networking, information technology and energy management and generation technologies. Our organization advocates at the state level for consumer access to energy data as an important lever in promoting innovation in the energy sector.

As other parties before this Commission have already stated, the energy industry poised for dramatic change -- change that in some cases is already underway. The implementation of Smart Grid technologies holds the promise of making the electric grid more reliable, resilient and efficient; strengthening the nation's energy security and providing consumers with new ways to save energy and money.

If we harness robust market forces and create a vibrant market, we can accelerate realization of these objectives. A key prerequisite is providing consumers access to their energy usage data. A consumer's access to his or her usage data — and his or her ability to freely and easily share that data with an energy management service of his or her choice, whether a third party or utility — enables consumers to save energy and lower their electricity bills to levels than would otherwise be the case. The American Council for an Energy-Efficient Economy's 2010 review of 57 studies found that consumer households with access to real time data down to the appliance level and energy management tools achieved household energy savings of 12%.¹ As tools become more automated over time, the potential savings become even more promising.

More than 35 utilities across the country have implemented and agreed to implement making available to consumers their energy usage data under the industry-led Green Button Initiative under which utilities provide consumers convenient access to energy data and allow them to share that data with authorized third parties who provide them with energy management services. The private sector has worked extensively to develop tools such as the Future of Privacy Forum's TRUSTe seal to ensure that customer privacy is protected in a manner that does not subject this fledgling sector to undue regulatory burdens and allows continuing private sector innovation to flourish.

The provision of energy usage data through these interfaces represents not only a potentially enormous, tangible source of value for consumers but also an economic opportunity for U.S. economic leadership in the energy management sectors. TechNet

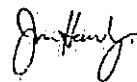
¹ Karen Erhardt-Martinez et. al.; *Advanced Metering Initiatives and Residential Feedback Programs: A Meta-Review for Household Energy-Saving Opportunities*, American Council for an Energy-Efficient Economy, Report Number E105, June 2010, p. ii-iii.

believes that U.S. economic leadership is best served through rules establishing a competitively neutral playing field in which the market can innovate and rapidly scale energy management services and products.

North Carolina, as a leader in information technology, has a tremendous opportunity to lead in the development of Smart Grid technologies. State rules will largely determine which states are able to develop a vibrant ecosystem of innovation that fosters global leadership and which cede that opportunity to others. States like Texas and California have adopted data access models that, in empowering consumers with access to their usage data and a broad choice of providers and new technologies to manage energy use, advance the potential for global leadership. We urge North Carolina to lead in seizing this opportunity.

TechNet would be pleased to be a further resource and appreciates your consideration of NCSEA's request, which we support.

Respectfully submitted,



Jim Hawley
General Counsel & Senior VP, State Policy
1215 K Street, Suite 1900
Sacramento, CA 95814
(916) 594 7987 (phone)
jhawley@technet.org



City of Asheville
Office of Sustainability
P.O. Box 7148
Asheville, NC 28802
www.ashevillenc.gov/green

2/8/13

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918
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4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Maggie Ullman. I am the Sustainability Program Manager for the City of Asheville. Asheville serves 83,000 citizens in Western North Carolina through a variety of services many of which consume significant amounts of energy such as our water utility, streetlighting, fire stations, and community centers. Our annual operating budget is \$132M with \$3.1M dedicated to electricity. Last fiscal year we consumed over 25 million kWh of electricity which was down 6.4% from the previous year due to our conservation and sustainability management practices. In addition to the energy management responsibilities of a large organization we are also stewards of our community's sustainability goals via a Sustainability Management Plan and corresponding carbon footprint reduction goals.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.



I am writing to express the City of Asheville's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Modernization of these rules would provide valuable information to inform elected officials, community groups and the general citizenry. Citizens around the country and specifically North Carolina are calling upon their local government to take leadership on climate change through energy conservation, clean technology and general sustainability. Imagine however if you were tasked with this scope but had no data to inform the strategy and measure the impacts. This is the predicament local governments are in. With access to energy usage information cities like Asheville could target specific neighborhoods for economic development programs to incentivize weatherization and energy retrofits. Asheville could work with regional partners by correlating home energy usage and emergency energy assistance requests to provide targeted energy conservation education at less of a cost than repeat fuel assistance grants. Without modernization of these rules we lack one of the most basic needs to impact change in our community: localized, up to date data.

I know the Commission is extremely busy, but the City of Asheville believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, which appears to read "Maggie Ullman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Maggie Ullman
Sustainability Program Manager
The City of Asheville
P.O. Box 7148
Asheville, NC 28801
828.271.6141

February 1, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918
Mailing Address:
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Jacqueline L. Patterson. I am **Principal and Owner of Sheercom, LLC**. Sheercom is an Energy and Sustainability Company where our core services include Energy Efficiency Solutions, Renewable Resources and Green Workforce Development. Sheercom is a small growth company and has been recognized as an emerging leader in the energy sector.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

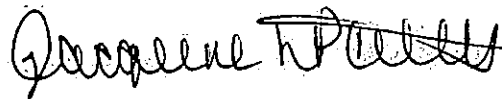
- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express my support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to Sheercom for the following reason(s): Advancement of the Energy Industry Sector in particular small and emerging businesses, enhancement of outreach and education in energy conservation through higher education and training.

I know the Commission is extremely busy, but I believe a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jacqueline L. Patterson". The signature is written in a cursive, flowing style with some loops and flourishes.

Jacqueline L. Patterson



11000 Regency Parkway
Suite 400
Cary, NC 27518
919.460-9220
www.noresko.com

February 4, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing Access to Customer Energy Usage Data (Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is John Hobbes. I am the Southeast Regional General Manager for NORESKO. As one of the largest energy services companies in the U.S., NORESKO utilizes design-build, performance-based contracting vehicles and asset monetization solutions to deliver energy and maintenance savings and significant infrastructure upgrades to existing facilities. NORESKO has guaranteed more than \$3 billion in energy and operating cost savings at more than 7,000 facilities throughout the U.S. and abroad.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express NORESKO's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to NORESKO because the energy efficiency projects that we perform for our clients are predicated on reducing their current energy spend. By allowing access to the consumption and billing history, we will have a better source of data. We will be able to increase the scope of our projects because of the quality, quantity and speed at which we can obtain the data. The types of projects that we provide

generate local jobs in the construction trades. Our industry estimated that we create 26 direct jobs per million in project value. Our average project is size is \$2.5 million; this would translate, given our North Carolina project backlog, to over 500 jobs.

I know the Commission is extremely busy, but NORESCO believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'J. Hobbes', with a stylized flourish at the end.

John A. Hobbes
Regional General Manager – Southeast
NORESCO



17 January 2013

Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing
Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

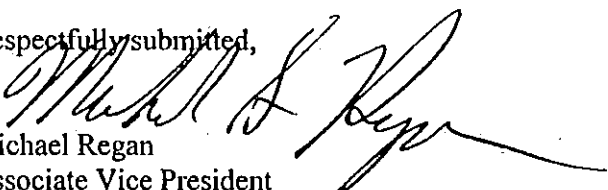
My name is Michael Regan. I am Associate Vice President – U.S. Energy and Climate for the Environmental Defense Fund (“EDF”). EDF is a non-governmental environmental organization. EDF's mission is to preserve the natural systems on which all life depends. Guided by science, we design and transform markets to bring lasting solutions to the most serious environmental problems.

We have reviewed the North Carolina Sustainable Energy Association's (“NCSEA”) initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express EDF's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data. We believe that providing additional energy usage information to consumers will better enable them to control their energy usage. I know the Commission is extremely busy, but EDF believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,


Michael Regan
Associate Vice President



Southeast Energy Efficiency Alliance

50 Hurt Plaza, NE Suite 1250

Atlanta, GA 30303 404-856-0723

www.seealliance.org

February 11, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918
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4325 Mail Service Center
Raleigh, NC 27699-4325

Re: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

On behalf of the Southeast Energy Efficiency Alliance ("SEEA"), I am writing to support the North Carolina Sustainable Energy Association's ("NCSEA") request for review and modernization of rules governing access to customer usage data as expressed in their initial comments on Commission Docket No. E-100, Sub 137.

SEEA is a nonprofit organization based in Atlanta, Georgia that drives energy efficiency across the 12-state region of Louisiana, Alabama, Arkansas, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee, Virginia and the U.S. Virgin Islands. Our board consists of utilities, energy service providers, state energy offices and experts from universities. SEEA staff are engaging in a broad spectrum of activities, including serving as members of Public Service Commission sponsored collaboratives, appearing as public witnesses, organizing and presenting at workshops, filing written comments, providing information to interested parties, counseling state and local officials on best practices and connecting officials and stakeholders to other national and regional expertise. Since March 2011, SEEA's partnership with the BECP Train-the-Trainer program has educated more than 600 new energy efficiency experts. We have a strong track record of developing and implementing successful programs in the Southeast and working with key stakeholders to develop and support energy efficiency policy.



SEEA has read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express SEEA's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

SEEA supports NCSEA's request for review and modernization of rules because we know that more energy usage data is essential to the future of energy efficiency in North Carolina and the time to act is now. Energy efficiency provides much-needed benefits to both customers and utilities. Benefits include reduced energy costs, increased customer satisfaction, improved reliability and energy security, reduced need for transmission distribution facilities, reduced fossil fuels, reduced environmental compliance burdens, and increased health and safety. Energy efficiency represents an opportunity to reduce energy costs, spur job growth, and benefit the environment.¹ By 2020, energy efficiency initiatives are expected to generate 390,000 net jobs in the United States.² By driving the expansion of the energy efficiency industry and creating new value and jobs to spur the economy, energy efficiency programs and policies support continued economic development and prosperity for Louisiana.

Throughout the nation, states recognize energy efficiency's potential to ease the burden of the economy. As the American Council for an Energy-Efficient Economy (ACEEE) observes, "Facing uncertain economic times, states are continuing to use energy efficiency as a key growth strategy to generate cost-savings, promote technological innovation, and stimulate growth."³

¹ MICHAEL SCIORTINO ET AL., THE 2011 STATE ENERGY EFFICIENCY SCORECARD viii (2012), *available at* <http://www.aceee.org/sites/default/files/publications/researchreports/e115.pdf>.

² RACHEL GOLD ET AL., APPLIANCE AND EQUIPMENT EFFICIENCY STANDARDS: A MONEY MAKER AND JOB CREATOR (2011), *available at* <http://www.appliance-standards.org/sites/default/files/A111.pdf>.

³ SCIORTINO ET AL., *supra* note 1.



State utilities are investing in energy efficiency as a bipartisan opportunity that makes economic sense, and states, utilities, and individuals are seeing a direct return on their investment.⁴ According to SEEA's research through 2008, regional savings were just shy of 4,000 average megawatts. Monetarily, this accounted for \$1.8 billion in savings, even after accounting for the cost of energy efficiency programs in electricity rates.

The bottom line is: energy efficiency is here to stay. A January 2012 report released by ACEEE, "The Long-Term Energy Efficiency Potential: What the Evidence Suggests," even concluded that energy efficiency in 2050, if properly invested, could save energy consumers as much as \$415 billion per year (which equates to \$2,600 per household annually).⁵ Initiatives with such an outstanding savings potential are worth exploring to their fullest. NCSEA's request represents an opportunity for North Carolina to foster substantial savings for her citizens for generations to come.

The timing for this rule could not be better because we are seeing increased interest of utility companies in energy efficiency at the system level, including Southern Company's recent and significant expansion of programs in Georgia and Florida, Entergy's increasing energy efficiency investments in Arkansas and New Orleans, and the Tennessee Valley Authority's (TVA) aggressive ramp up of its programs in states, including Tennessee, Alabama and Mississippi, along with parts of Georgia, North Carolina and Virginia. Furthermore, North Carolina has a breadth of existing energy efficiency activities that have created significant momentum from which we can build.

We congratulate the North Carolina Utilities Commission members and staff, utility representatives and other stakeholders on the significant progress and commitment that have already been made to energy efficiency programs that are strengthening the economy, quality of life and environment in North Carolina, and we believe that NCSEA's request will take North Carolina one step further.

We know the Commission is busy and appreciate your thoughtful consideration of our comments. In addition to our support of NCSEA's request, SEEA would like to offer its assistance and support to the Commission to ensure North Carolina is even more successful.

⁴ Fourteen states report a utility cost of saved energy from \$0.016 to \$0.033 per kWh, with an average cost of \$0.025 per kWh. KATHERINE FRIEDRICH ET AL., SAVING ENERGY COST-EFFECTIVELY 9 (2009), available at http://www.aceee.org/files/pdf/conferences/ eer/2009/4C_Friedrich_Eldridge.pdf.

⁵ JOHN A. "SKIP" LAITNER ET AL., THE LONG-TERM ENERGY EFFICIENCY POTENTIAL: WHAT THE EVIDENCE SUGGESTS iii (2011), available at <http://www.aceee.org/sites/default/files/publications/researchreports/e121.pdf>.



Southeast Energy Efficiency Alliance

50 Hurt Plaza, NE Suite 1250

Atlanta, GA 30303 404-856-0723

www.seealliance.org

Please do not hesitate to contact me at 404-602-9646 or mmahoney@seealliance.org. We are eager to share our Southeastern strategic and technical resources, best practices, and expertise.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Mahoney", is placed over a rectangular area of the document that has been heavily speckled or redacted.

Mandy Mahoney
Vice President
SEE A



January 31, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918
Mailing Address:
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No: E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Shannon Smith. I am the CEO for Abundant Power Group. Abundant Power's mission is to expand energy efficiency in the built environment through innovation and excellent delivery of transformative financial and technology solutions that motivate building owners and occupants to make lasting change in energy consumption. We are investing in excess of \$100MM in energy efficiency programs in the Southeast.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

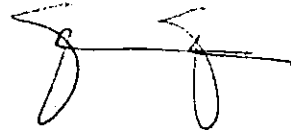
- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express Abundant Power's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to Abundant Power for the following reason(s): We provide energy efficiency as a service which requires a clear understanding of past energy usage. Lack of easy access to such data makes our investments to improve building efficiency difficult.

I know the Commission is extremely busy, but Abundant Power believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Shannon G. Smith', written over a horizontal line.

Shannon G. Smith
CEO

February 8, 2013

Gail L. Mount, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing Access to Customer Energy Usage Data (Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

I am writing on behalf of the North Carolina Solar Center at North Carolina State University ("Solar Center") in support of the request by the North Carolina Sustainable Energy Association ("NCSEA") to review and modernize the rules used by the Commission to govern the accessibility of customer energy usage data. The Solar Center works to advance a sustainable energy economy by educating, demonstrating and providing support for clean energy technologies, practices, and policies. The Solar Center serves as a resource for innovative, clean energy technologies through demonstration, technical assistance, outreach and training. It also administers the Database of Incentives for Renewables & Efficiency (DSIRE), a nationally recognized resource containing detailed information regarding financial incentives and policies that impact the clean energy technology sector.

In NCSEA's initial comments in Commission Docket No. E-100, Sub 137, they request that the NCUC commit to opening a new rulemaking docket in which several key aspects of regulatory modernization can be examined, including:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express the Solar Center's support for NCSEA's request. Appropriate modernization of the rules is relevant to the Solar Center for a number of reasons:

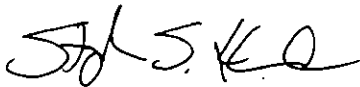
- The Solar Center is frequently asked by state agencies and other policymakers to provide analysis of various aspects of the clean energy marketplace and this kind of data would create opportunity for more precise study of consumer behavior relating to energy use. For example, the availability of such data would enable the Solar Center and other researchers in the public sector to more effectively provide third-party analysis of the effectiveness of utility incentive programs like rebates or on-bill financing, when used in conjunction with other demographic data;
- A large part of the Solar Center's mission is to support companies, ranging from large, well-established corporations to small start-up firms, which seek to bring new efficiency or distributed generation technologies to market. Many of these companies would be able to utilize data of this nature to develop and deploy an array of products designed to save consumers and businesses energy. Furthermore, many of these companies are based in and

support many jobs in North Carolina. This initiative would provide a better opportunity to develop and make these products here rather than taking their talent and jobs to other so-called "smart grid" technology centers in other states, like Austin, TX; Boston, MA; San Diego, CA; or Denver, CO; and

- The Solar Center is also concerned about protecting the privacy of consumer information. One of the largest barriers to the diffusion of smart grid technology is the concern of individuals about their potential loss of privacy as the technology moves into the marketplace. The Solar Center believes this issue needs to be addressed directly to allay legitimate concerns of consumers and provide appropriate protections. A review of the current, outdated rules is an appropriate way to ensure that customer information is not used inappropriately by those who have it through incumbency or because of technology advance that was not contemplated when the rules were originally written. This should be done in a way that strives to achieve a balance with the vast potential energy savings and ease of integration to the grid system for distributed energy resources that could accrue from increased use of energy management technologies.

For these reasons, the Solar Center believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. S. Kalland", written in a cursive style.

Stephen S. Kalland
Executive Director

February 11, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918
Mailing Address:
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Anne McKibbin, and I am the Policy Director for CNT Energy. CNT Energy is a Chicago-based nonprofit that helps consumers and communities become more energy efficient and obtain the information and services they need to control energy costs. We have 55 employees who create local programs and conduct research in the areas of dynamic electricity pricing, energy efficiency, and regional energy planning. In the Chicago area, our Energy Savers multifamily efficiency retrofit program recently celebrated the retrofit of its 10,000th unit of housing. We help local housing organizations around the country design energy efficiency programs based on this experience and research. We administer two of the nation's largest residential hourly electricity pricing programs, Ameren Illinois' Power Smart Pricing and ComEd's Residential Real Time Pricing. In addition, we have helped numerous municipalities in the Chicago area and nation-wide better understand their residents' aggregate energy use and use that information for planning purposes.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and advanced as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express CNT Energy's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to CNT Energy because:

- Our research and experience with hourly electricity pricing have shown that residential customers find this information to be useful in controlling their energy use.
- Our research and experience in designing Energy Savers has shown that combining address-level energy use data with other publicly available information on building type can lead to an understanding of the local building stock that is invaluable for designing energy efficiency programs that address the most common building deficiencies at the lowest cost.
- Our regional planning work has demonstrated that municipalities find aggregated energy use information for their communities to be a useful input to their planning processes and in making local policy decisions.

I know the Commission is extremely busy, but CNT Energy believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention.

Respectfully submitted,



Anne McKibbin
 Policy Director, CNT Energy
 1741 N. Western Ave. Chicago, IL 60647
 773-269-2225 office



February 8, 2013

Chief Clerk
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Raleigh, NC 27699-4325

ASU Energy Center
Appalachian Enterprise Center
180 Poplar Grove Connector
ASU Box 32131
Boone, NC 28608-2131
(828) 262-7514
Fax: (828) 262-6553
www.energy.appstate.edu

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

I am writing on behalf of the Appalachian Energy Center in support of NCSEA's request that the Commission open a rulemaking docket dedicated to reviewing and modernizing the rules which govern access to customer energy usage data.

I have read the initial Comments of North Carolina Sustainable Energy Association (NCSEA) submitted in Commission Docket No. E-100, Sub 137 wherein the NCSEA requests that the commission open a separate rulemaking docket to explore:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third parties with customer permission; and,
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third parties.

The rules which govern access to customer energy usage data effectively prohibit customers from utilizing some of the products and services offered by companies in the areas of device-level metering, energy usage monitors, automated energy controls and other energy informatics technologies. The current rules also severely limit the ability for researchers to access and analyze energy consumption information, eliminate the ability of community service organizations to measure and document the effectiveness of programs to improve energy efficiency, and impede the development of cost-effective efficiency programs and incentives targeted to the needs of specific populations for whom energy expenditures represent a disproportionately large share of household income (e.g., elderly or other fixed-income customers, impoverished communities, low-income households, etc.).

From a more academic perspective, access to the type of information listed above would enable independent evaluation of the impacts of a wide variety of initiatives such as: ENERGY STAR and other energy efficient home certifications, the effect of changes in building codes on energy consumption rates, and the effectiveness of utility energy efficiency initiatives, to list a few. There are also ample research opportunities

which would increase our understanding of energy consumption patterns in relation to weather, household income, physical characteristics of homes, as well as how energy consumption changes over various lengths of time ranging from intraday to multi-year spans.

Efforts to influence energy efficiency at the residential level date back decades; however, success has been modest at best when compared to the leaps in energy efficiency other market segments have achieved over the same period. It is not uncommon to hear the lack of residential efficiency improvements attributed to the unwillingness of customers to change their behavior or spend the time or effort necessary to reduce energy consumption. A number of recent studies have challenged these long-held beliefs and have demonstrated results far beyond what decades of effort managed to produce.

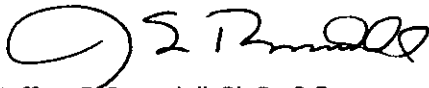
For instance, a 2011 article published in the *Journal of Public Economics* titled "Social norms and energy conservation" found that simply providing customers with information about how their energy consumption compared with similar households in their community resulted in the highest 10% of energy-consuming households reducing their consumption by 6.3%. Under current North Carolina rules this type of initiative may not be possible because it requires releasing consumption data for a group of customers.

Another study¹ published by the University of California Center for Energy and Environmental Economics in August 2012 examined the effect of information feedback on consumer response to energy prices. Using technology to lower consumers' information acquisition cost, the study examined the marginal information effect. In the study, consumers who received only price signals reduced demand by between 0% and 7%, but consumers who were also provided with information feedback about their energy consumption reduced their demand by as much as 22%.

The substantial gains in energy efficiency and peak demand reduction demonstrated in these two examples did not require new appliances, CFLs, or re-insulating homes – peak demand reductions of more than 20% and more than 6% reductions in energy consumption were attained through nothing more than providing consumers with information. We cannot guarantee the level of benefits from efforts by the Commission to increase access to energy consumption data. However, without revisions to modernize the rules governing access to these data, electric consumers in North Carolina will never have a chance to reap the benefits made possible by data-driven innovations.

Therefore, I respectfully support the request that the Commission establish a rulemaking docket to review and modernize the rules that govern access to customer energy usage data.

Sincerely,



Jeffrey E. Ramsdell, Ph.D., P.E.
Professor and Director
Appalachian Energy Center
Appalachian State University
ramsdellje@appstate.edu

¹ Jessoe, Katrina; Rapson, David. Knowledge is (Less) Power: Experimental Evidence from Residential Energy Use. UC Center for Energy and Environmental Economics. Berkeley, CA. August 2012.

NC STATE UNIVERSITY



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February 11, 2013

Chief Clerk North Carolina Utilities Commission
430 North Salisbury Street
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RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing Access to Customer Energy Usage Data (Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

I am Melissa McHale, Professor of Urban Ecology at North Carolina State University. The urban ecology lab has been interested in modeling the drivers of residential energy use to answer key questions concerning urban sustainability and resource use. For instance, there have been tree-planting programs popping up all over the country in partnership with energy companies. We aim to understand how effective these tree plantings have been in reducing residential energy consumption. We believe that by understanding the most influential variables effecting home energy use, we can begin to save energy and money for both the residents and energy companies in our cities.

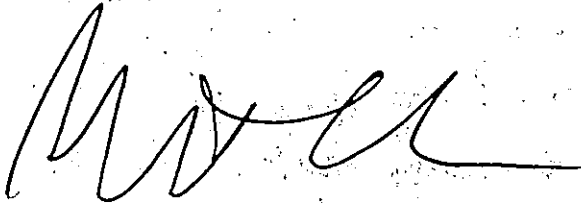
I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and advanced as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties. I am writing to express CNT Energy's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data. Review and appropriate modernization of the rules is relevant to CNT Energy because:
- Our research and experience with hourly electricity pricing have shown that residential customers find this information to be useful in controlling their energy use.

- Our research and experience in designing Energy Savers has shown that combining address-level energy use data with other publicly available information on building type can lead to an understanding of the local building stock that is invaluable for designing energy efficiency programs that address the most common building deficiencies at the lowest cost.
- Our regional planning work has demonstrated that municipalities find aggregated energy use information for their communities to be a useful input to their planning processes and in making local policy decisions. I know the Commission is extremely busy, but CNT Energy believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention.

I believe a modernization of the rules regarding access to these datasets would be valuable for a variety of stakeholders interested in energy consumption.

Sincerely,

A handwritten signature in black ink, appearing to read 'McHale', with a stylized, flowing script.

Melissa McHale
Assistant Professor of Urban Ecology
Forestry and Environmental Resources
College of Natural Resources
North Carolina State University
Office: Jordan Addition 5225
Phone: 919.515.7579
Email: mrmchale@ncsu.edu



February 6th, 2013

Chief Clerk
North Carolina Utilities Commission
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Lucas Fishback. I am the CEO of PlotWatt, Inc. PlotWatt is an energy analytics company headquartered in Durham, NC, serving residential, commercial and utility customers. We currently employ approximately 20 full time employees, most of whom are engineers. PlotWatt has been awarded more than \$4M in prizes, grants, and equity funding, including selection as one of five global GE Ecomagination winners, honors from the White House, and a grant from the North Carolina Green Business Fund.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.



I am writing to express PlotWatt's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to PlotWatt for the following reason(s): access to meter data allows us to deliver much-needed energy saving tools including our patent pending energy disaggregation service which enables homes and business to learn about their appliance-level usage and opportunities for saving. Our technology is currently live on thousands of homes and small businesses around the world, saving some users as much as 50% on their energy bills. In service territories where utilities have adopted third party meter data access through standards such as Green Button, PlotWatt is already delivering invaluable insight to consumers and utilities alike. Here in North Carolina, our utilities have not yet deployed any such standards for accessing and sharing data.

I know the Commission is extremely busy, but PlotWatt believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

Lucas Fishback

CEO / Founder PlotWatt, Inc.

Email: luke@plotwatt.com

February 8, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918
Mailing Address:
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

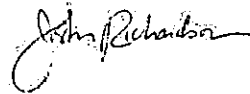
I am writing to express my support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to me for the following reasons as they relate to the duties and responsibilities of the Office of Sustainability staff at the Town of Chapel Hill:

- Using Census block or block group level data (demand capacity, total use, average use per entity, peak use, etc.: all per sector) to **design and target** city energy efficiency and conservation programming efforts aimed at meeting policy goals for greenhouse gas emissions reductions, efficiency, housing affordability, etc.; and
- Using Census block or block group level metrics to measure energy efficiency across various city neighborhoods and districts over time, with the goal of **assessing** whether communities are meeting policy targets for greenhouse gas emissions reductions, efficiency, housing affordability, etc.

I know the Commission is extremely busy, but I believe a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term. The views expressed in this letter are mine individually and do not represent the official position of the Town of Chapel Hill.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John Richardson", with a stylized, cursive script.

John Richardson
Sustainability Officer
Town of Chapel Hill



February 8, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918
Mailing Address:
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Justin Segall. I am Co-Founder and Executive Vice President for Simple Energy. At Simple Energy we're changing how millions of people save energy by revolutionizing how utilities engage their customers. Our Customer Engagement Platform of technology brings a better understanding of how to build better connections between the utility and its customer in order to:

- Motivate customers to change their energy consumption behavior to maximize savings;
- Participate in peak load reduction and demand response opportunities through behavior changes and automation technology; and
- How to better understand and interact with the smart grid through the use of leading behavioral science and game mechanics.

We combine these insights with the powerful tools of the modern social web to engage customers and help our utility partners and their customers achieve cost effective energy efficiency and demand response results. Simple Energy's Customer Engagement Platform supports utility smart grid, energy efficiency and demand response programs by making them social, fun, and simple.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137 and other comments filed in this proceeding by interested parties. We support the following aspects of regulatory modernization and would urge the Commission to take necessary measures which they deem appropriate in a collaborative effort to move forward as quickly as possible and adopt the following:

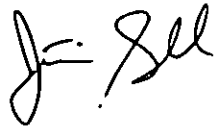
- a) Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;

- b) Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- c) Recognizing behavior-based energy efficiency programs and demand response programs as an important element of utility demand side management portfolios to empower customers to better manage their energy usage.
- d) We do not suggest a separate rule making proceeding is necessary, but if the Commission, the utilities, and other affected Stakeholders believe such a proceeding to be the best vehicle to move forward rapidly, we could certainly support that effort.

Simple Energy is a national company working with utilities across the U.S. We are a leading multi-state utility technology provider and as such I am writing to express my support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, through a collaborative process inclusive of all stakeholders, the rules that govern access to customer energy usage data.

I know the Commission is extremely busy, but Simple Energy believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J. Segall", written in a cursive style.

Justin Segall

Founder and Executive Vice President



P.O. Box 2223, Durham NC 27702-2223
919.323.3244
www.cleanenergydurham.org
info@cleanenergydurham.org

February 7, 2013

Chief Clerk
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430 North Salisbury Street
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Mailing Address:
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Philip Azar. I am the Executive Director of Clean Energy Durham. Clean Energy Durham's mission is to help communities use less energy and save money by enabling neighbor-to-neighbor teaching of energy efficiency workshops. We envision a day where families and communities spend more time together, expend less energy and have more money in their individual and collective pockets. Our training is based primarily on our experiences in Durham, which has been documented in a series of training documents made available to other communities under the Pete Street™ brand. In contrast to many programs, we focus on low and no cost energy saving steps that can be taken in residential settings, which means that there are, relatively speaking, few if any barriers to low income populations implementing the steps that we teach. We also provide information on where energy is typically lost and used in the home and where the most cost effective (and potentially job-creating) investments are when considering home energy investments.

In order to assess the impact of our programs, we partnered with a university research group (UNC Environmental Finance Center) to analyze energy data associated

with our Pete Street program as implemented in Warren County. (<http://www.efc.unc.edu/publications/2012/CleanEnergyEvaluation.pdf>). In Warren County, in contrast to jurisdictions where investor-owned utilities ("IOC") controlled access to energy data, Halifax EMC made energy data available for analysis. The analysis showed that our workshop participants typically used 20% more electricity than other Halifax EMC customers before attending a workshop; those attending any of our workshops used 7.5% less electricity compared to non-participating Halifax EMC customers; and those participating in multiple Hands-On Workshops used 17.5% less electricity compared to non-participating Halifax EMC customers. This study and the important lessons learned from it were only possible by having meaningful access to utility data.

While Clean Energy Durham has historically avoided advocacy, we feel that it is crucial that we support the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137, both for the reasons stated in that document and for reasons based on our own experiences in Durham and in other communities throughout North Carolina.

I am writing to express Clean Energy Durham's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data, and that you move forward to

- Make meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Make meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Make aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

Based on our experience in Durham and elsewhere, we would add the following to NCSEA's comments:

- The absence of detailed energy data from IOUs puts most non-utility energy organizations (whether for profit or non-profit, whether in the renewable energy space, the alternative energy space or the energy efficiency space) at a competitive disadvantage vis-a-vis organizations

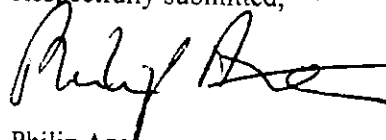
based in jurisdictions where data is readily available. Data is needed to accurately demonstrate impact and, at least as importantly, to allow organizations to react to data and refine their programs based on timely feedback.

- The absence of detailed energy data from IOUs does not just affect non-utility energy efficiency organizations as outlined above, but delays program adoption throughout the state. Assume that the type of data the UNC Environmental Finance Study had access to in Warren County had been available in Durham and that the efficacy of our program had been established 2 or 3 years earlier. How many more communities would have rolled out whole community energy efficiency programs? How much more energy would have been saved? How much money would individuals and communities have been able to retain? Would Duke Energy, for example, have been able to further delay plants, pull down plants or reduce production based on savings resulting from earlier and more widespread adoption of whole community energy efficiency programs? From a more selfish, competitive perspective, would Clean Energy Durham have had a series of reports to use to improve its programs?
- In the absence of detailed energy data being made available on a consistent, principled manner throughout the Commission's jurisdiction, unfortunate and counter-productive perceptions persist that the IOUs are not truly interested in energy efficiency or that, while interested, they are primarily interested in their own energy efficiency programs, to whom they may, directly or indirectly, make detailed energy data available.
- The understanding that "DSM/EE achieved through a utility program is considered to be more of a nature that it 'can be incorporated as a reliable resources in the utility's IRP,'" (NESEA Initial Comments, p. 12 fn. 10), may more accurately reflect the current regulatory environment than the actual efficacy of IOU energy efficiency programs compared to third-party programs. Currently, the reliability of energy efficiency programs must be proven, in the main, by data that the IOUs control and which is not generally available to others. It may be that non-utility programs are as effective/reliable or even more so compared to utility programs, but that is for data and analysis to prove and not an assumption to be accepted in the absence of data and analysis.

We urge the Commission to begin planning to go beyond NCSEA's request for greater information access in the golden age of information. Data availability, while much needed for energy efficiency programs, does not alleviate the need for greater support for energy efficiency programs that can reach entire communities, inclusive of

low income populations. Energy efficiency programs reaching or targeting entire communities are within the Commission's mandate for specific attention under N.C. General Statute 62-2(a)(3) (promotion of adequate, reliable and economical utility service to all of the citizens and residents of the State) (emphasis added).

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Philip Azar", with a stylized flourish at the end.

Philip Azar
Executive Director
Clean Energy Durham

February 6, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Mailing Address:
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing
Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Kenneth Szymanski. I am the Executive Director for the Apartment Association of North Carolina (AANC). The AANC is a statewide organization comprised of local apartment associations to promote safe, affordable housing through participation in the legislative process, and through communication with and education of its members, public officials, and the general public. The AANC affiliates and their members operate multi-family rental housing primarily in urban parts of the state – in every income strata and every ethnicity, and collectively house some 550,000 North Carolinians. The members develop, own, and manage apartment communities.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

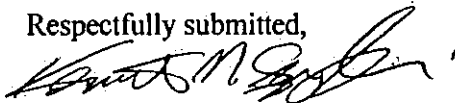
I am writing to express AANC's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to AANC and its member apartment owners for the following reason(s):

- Examining and understanding the energy performance of an apartment building—that is, measuring it and comparing it to similar buildings—requires data on energy consumption. Owners and operators of apartment buildings must have access to this data for the whole building in order to benchmark it accurately. However, whole-building energy data is often difficult for them to obtain. The barriers include separate meters with utility accounts in the names of individual apartment residents, manual data collection, and utility data policies (the so-called "Code of Conduct"). The same rationale about the need for better building data availability similarly applies to individual apartment dwelling unit energy data;
- It is important to protect customer privacy while providing building owners the data they need to "benchmark" and make their buildings and dwelling units more efficient. A variety of strategies including data aggregation can be used to accomplish this goal;
- There are tens of thousands of pre-1990 apartments in North Carolina, many of them ripe for Energy Efficiency improvements. Often, the populations housed in these dwellings are middle to lower-income households who pay market-rate rents without public subsidy, earning between 40% and 80% of Area Median Income. For every household in this income band that receives a public rent subsidy, there are twenty households that do not. The reasonable release of better energy consumption data is vital to the owners in their deliberations about making structural and appliance energy improvements and in demonstrating cause-and-effect results of the improvements to their apartment residents – who make decisions about housing and utility costs.

I recognize that the Commission has its hands full with many matters, but the AANC believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,



Kenneth N. Szymanski

Apartment Association of NC

Executive Director

February 7, 2013

Chief Clerk
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430 North Salisbury Street
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RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing
Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

Advanced Energy Economy (AEE) is a national association representing companies providing technologies and services that make the energy system more secure, clean, and affordable. We believe that open and transparent markets are critical to enabling competition, innovation, and ultimately, improved energy system performance. As a result, we strongly support NCSEA's request for an investigation into the modernization of the rules governing access to energy data, which would facilitate expansion of the burgeoning marketplace for end user services.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

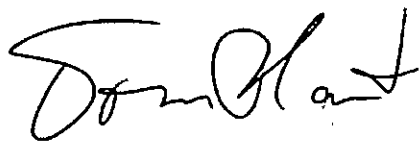
- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

Washington, DC
San Francisco
Boston
www.aee.net

I am writing to express Advanced Energy Economy's support for NCSEA's request that the Commission call for and lead an effort to review and modernize the rules that govern access to customer energy usage data in such a way that will both protect consumer privacy and open opportunities for consumers to benefit from services provided in a competitive marketplace. Companies associated with end user services within the paradigm of an intelligent grid would welcome the opportunity to deploy innovative products to meet the needs and desires of consumers, but such work requires an open marketplace. The proposed docket would provide the opportunity to create just that type of marketplace.

It is for these reasons that Advanced Energy Economy urges the Commission to support the NCSEA request to open a docket for review and modernization of the rules that govern access to customer energy usage data. Such review is extremely important and merits the Commission's time and attention.

Respectfully submitted,



Tom Plant
VP, State Policy
Advanced Energy Economy
PO Box 148
Nederland, CO 80466
tplant@aee.net
www.aee.net



Tolerable Planet Enterprises

February 8, 2013

Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

I am writing in support of the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In particular, NCSEA's request seeking your commitment to open a rulemaking docket with regard to modernizing data access policies is particularly timely and would bring benefits to consumers and businesses within North Carolina and beyond.

Tolerable Planet Enterprises is a strategic consulting firm focused on energy policies for the new energy economy. Our clients include technology companies, consumer service companies, project developers, private investors and philanthropies.

Previously, I served at Tendril as Vice President, Policy. In this capacity, I was responsible for all aspects of the company's regulatory research and engagement. We worked diligently before public utility commissions nationwide to highlight the many benefits of timely and meaningful consumer access to their energy data. In our experience, meter-level data was a fundamental component of a successful consumer engagement strategy.

NCSEA requests that you commit to opening a separate rulemaking docket to address modernizing aspects of regulatory policy, including specifically:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

By modernizing regulatory policies governing consumer access to energy data, North Carolina would join many state, utility and federal efforts to put information into the hands of consumers. For example, the California Public Utility Commission has established data access and privacy policies within the context of a rulemaking proceeding (R.08-12-009). This proceeding provides a

working model for the policies proposed by NCSEA. In September 2012, the Commission extended data access policies to "allow customers to, in near real-time, monitor their energy consumption" (See Resolution E-4527 issued September 27, 2012).

Further, numerous utilities around the country has committed to implement data access through the "Green Button Initiative." As noted at Data.gov:

The Green Button initiative gives utility customers easy access to their electricity usage data. This data is provided as a text file in a format that is standard across multiple utilities. This data file can then be shared with third party developers who can provide valuable context, analysis, and other functions based on that usage data. About 10-12 million customers (commercial and residential) currently have access to their data in this format, and 20-30 million are expected to have access by the end of 2012.ⁱ

Clearly, as the Green Button Initiative demonstrates, there are working models for providing secure, timely and actionable information about energy use to consumers and their trusted, authorized partners. Further, there are many applications available to help consumers use this information to manage their energy use. However, these applications are only useful to the degree that consumers can have secure, convenient access to their own energy data in forms consistent with modern services and software tools.

I urge you act upon NCSEA's requests. Modernizing energy data policies will help consumers save energy, supporting new products and services within North Carolina and nationwide.

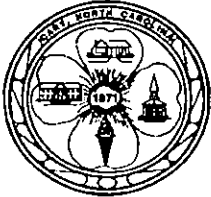
Thank you for your time and consideration.

Sincerely,



Cameron Brooks
President
Tolerable Planet Enterprises

ⁱ See: <http://www.data.gov/energy/page/welcome-green-button>



TOWN MANAGER'S OFFICE

February 8, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918
Mailing Address:
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules Governing
Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

As the Town Manager of a municipality with over 143,000 residents, I am writing to support the North Carolina Sustainable Energy Association's ("NCSEA") request for modernization of rules governing access to customer energy usage data.

Our municipality manages both the supply side and demand side of our energy use, with a particular emphasis on electricity, which is where the bulk of our close to \$10 million energy budget is spent. In order to manage this effort efficiently, we are working to accurately compile our energy data on at least a monthly basis into an online system that will allow us to analyze and manage our rates and use, and to identify energy-using equipment problems or billing problems. So it is the meter-level consumption, load profile, and billing data, provided in an easy-to-use electronic format that we are most interested in seeing from our utility. We are well on our way towards achieving this since our electric utility, Progress Energy Carolinas, provides this information in a close-to-ready to use format for all but our consolidated accounts. We are eager to hear the plan for how Duke Energy, as the parent company of Progress Energy Carolinas, plans to provide electronic data in a responsive manner to large

TOWN OF CARY

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clients such as municipalities like the Town of Cary who have a responsibility to efficiently and effectively manage how citizen tax dollars are spent. Progress Energy Carolinas has been a reliable partner in assisting us with not only information, but also programs that incent energy efficiency, and we are extremely grateful for this relationship. We anticipate that the best outcome from this request is that utilities will provide information in a responsive manner that allows quick and easy electronic analysis of both energy-related information like consumption but also financial information like consumption and demand charges, taxes, and fees.

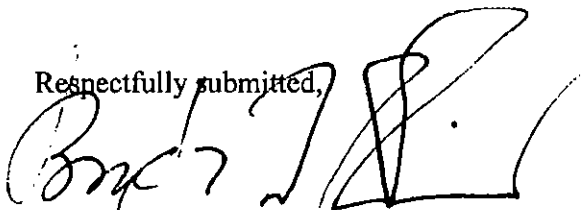
I have read the initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express my support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

I know the Commission is extremely busy, but I believe a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ben T. Shivar", written over a horizontal line.

Benjamin T. Shivar

Town Manager

Town of Cary NC

03/07/13

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918
Mailing Address:
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Lawrence Steffann I was most recently Vice President of Product Development for Consort Inc. an energy management startup founded in Raleigh, North Carolina in 2008. It is my personal belief that if the regulations of the State of North Carolina were competitive with other states Consort would have been able to create a firmer foothold here in North Carolina and not be forced to move to Texas, sending over 60 jobs out of the State of North Carolina to Texas.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
 - Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
 - Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.
-

I am writing to express my support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to me for the following reasons: Consort created a complete eco-system designed to measure and validate energy data in residential and small business environments, to generate an open market for the energy under management and to improve the efficiency of this energy. Successful industries uniformly apply metrics to be effective. Since we have three principle stake holders in this arena, Customers, Utilities, and Service Providers all three stake holders need new rules and regulations to ensure future success. All three parties need to be able to measure this data as it applies to their best interest and share this data to be competitive in today's energy market. If data cannot be measured it cannot be managed. Allowing data to be effectively managed will allow the energy market in North Carolina to become more competitive with our neighbors, attracting critical talent, resources and projects. Progressive action by the state will allow North Carolina to develop into the global clean tech energy cluster that is poised to become.

I personally believe a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,



Lawrence Steffann

Vice President of Product Development

Consort 2009-2012



January 31, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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Raleigh, NC 27603-5918
Mailing Address:
4325 Mail Service Center
Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Dr. Christine E. Boyle. I am CEO of Blue Horizon Insight and a affiliate scholar at the University of North Carolina at Chapel Hill's School of Government. Blue Horizon Insight is a research and analytics firm providing environmental benchmarking, risk, and strategic assessments for companies and local and national governments. We work with local governments in the southeastern United States as well as in Asia. In our capacity as a research firm, we work with local governments on energy related planning and development and rely on quality data with which we provide empirically based assessment for strategic development of energy-related resources.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.



I am writing to express Blue Horizon Insight's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to Blue Horizon Insight for the following reason(s):

First, on the topic of "Evidence that aggregated data at the zip-code level would be of value to various researchers", we base this on the following data-use types:

- Using zip code level energy use metrics to assess individuals' variance from the surrounding users' (mean use, total use, peak use, etc)
- Using zip code level metrics to measure city- county- state- level energy efficiency levels over time, to assess whether communities are meeting policy targets for GHG reductions, efficiency, etc
- Using zip code level data (demand capacity, total use, average use per entity, peak use etc: all per sector) to design and target city county and state level energy efficiency programming efforts.

Second, on the topic of "types of data sets researchers are interested in for all access types", researchers, industry, and local governments can use meter-level data in many ways including for the public and private benefit such as:

- Targeting energy-efficiency programming and subsidies to customers most in need in the community through meter analysis (see example University of North Carolina's School of Government did with a public utility here: [Benson Water and Electricity Customer Sales Profile](#))
- Program evaluation of energy-efficiency financing and other programs
- Policy research that cross tabulates meter-level energy use data with home age, demographics, and other factors to see where potential efficiencies and cost savings lie within localities, in particular for underserved populations such as low income homes, multi-family homes, and all rental homes.
- Useful data at the meter level will include but not be limited to monthly data per meter on: peak demand (kWh), non-peak demand (kWh), total use (kWh), total charge, charge components (peak versus non-peak charge, fixed versus variable etc) , total days of use measured, sector identification, meter size, zip code, parcel number.



I know the Commission is extremely busy, but Blue Horizon Insight believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

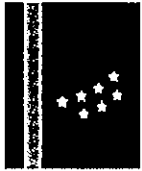
Respectfully submitted,

A handwritten signature in black ink, reading "Christine E. Boyle". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Christine E. Boyle, PhD

CEO
Blue Horizon Insight, LLC
1/31/2013

DURHAM



1869
CITY OF MEDICINE

CITY OF DURHAM

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919.560.1200

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February 6, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
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RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Tobin Freid and I am the Sustainability Manager for the City of Durham. The City of Durham is home to over 233,000 residents and is the 4th largest city in North Carolina. Our operating budget in FY 2011-12 was \$144 million and our energy costs for buildings and water systems were over \$4.47 million (electricity and natural gas), or about 3% of our operating budget. Last year we consumed over 63,000 Mwh of electricity.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137 NCSEA requesting that you open a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward.

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

The City of Durham fully supports NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Good Things are Happening in Durham

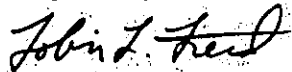
Review and appropriate modernization of the rules is relevant to the City of Durham as we strive to increase energy efficiency in our community and meet the goals of our Greenhouse Gas Emissions Reduction Plan adopted in 2007.

The City of Durham has implemented programs designed to help residents reduce energy use in their homes, including subsidizing home energy retrofits, and increased access to data will enable the City to evaluate these programs to know if they should be changed or renewed. Most recently, we provided subsidies for energy retrofits for 709 homes and received permission from the households to monitor their energy use over a 3 year period (1 year prior and 2 years after the retrofit). Having received permission from the households, we needed to communicate this authorization to our electricity and natural gas providers. We worked with our electricity and natural gas providers to develop appropriate account holder release forms and procedures. We secured each participating household's signature using the agreed upon form. Since securing the signatures, we have approached our main electricity provider to get the household energy usage data. We have experienced significant delays in having the authorizations fully honored by our main electricity provider. To date, we still do not have all of the data we had agreed to when we designed the program and so analysis of our program effectiveness cannot be completed. To the extent the authorizations have been honored, data has been provided in user-unfriendly formats that require a great deal of data entry on our part. A Commission rulemaking could look at these types of issues associated with data access and help to streamline and standardize the process.

Additionally, the City of Durham is in the process of creating a Neighborhood Vitality Index, to show various measurements of healthy, vibrant neighborhoods over time. Energy use is one measure that the City of Durham feels would show community health because it reflects the state of the housing stock, levels of responsibility that residents take in reducing energy use, and costs of living related to utility bills. For this Index the City of Durham desires to use aggregated data at a census block group or similar scale. If the Commission establishes clear rules regarding reasonable access to aggregated data, it would be very helpful to advancing initiatives of this sort.

I know the Commission is extremely busy, but the City of Durham believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tobin L. Freid". The signature is fluid and cursive, with the first name "Tobin" being more prominent.

Tobin L. Freid
Sustainability Manager
City of Durham



1385 Cambridge Street, Cambridge, MA 02139
www.cleanenergysol.com

February 6, 2013

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street
Dobbs Building
Raleigh, NC 27603-5918
Mailing Address:
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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of Rules
Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Steve Morgan. I am President of Clean Energy Solutions, Inc. ("CESI"). We work across a range of organizational forms and sizes, and have helped many non-profit organizations and large-scale public/private partnerships succeed in achieving their energy and community development goals. CESI is a 10 person company that works extensively in the Southeast. To date, CESI's staff has raised tens of millions of dollars in federal grants for the "energy alliances" we have set up in many US cities.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;

- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.

I am writing to express CESI's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to CESI for the following reason(s):

- CESI has been administering the Town of Chapel Hill and Carrboro's WISE Better Buildings Neighborhood Program since 2010. Obtaining post-retrofit data for the residential and commercial projects would be extremely valuable to clearly illustrate the benefits of the program and help secure future funding.
- CESI assists both other communities and utilities in the design and early implementation of energy efficiency buildings programs, for which utility data is a vital component informing the effectiveness of program initiatives;
- CESI also advises national and community foundations, the US Department of Energy, and the Department of Housing and Urban Development on best practices in energy efficiency program design for buildings. Without the utility data to compare pre- and post-retrofit program results, the quality of our advice is compromised.

I know the Commission is extremely busy, but CESI believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Stephen J. Morgan", with a long horizontal flourish extending to the right.

Stephen J. Morgan
President



USGBC NORTH CAROLINA
P.O. BOX 31384
CHARLOTTE, NC 28231-1384
www.usgbcnc.org

February 5, 2013

EXECUTIVE DIRECTOR

Emily Scofield, LEED® AP BD+C
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704-608-1999
Escofield@usgbcnc.org

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VICE-CHAIR
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SECRETARY
Nancy Olah, LEED® AP
Parker Poe Adams & Bernstein LLP

TREASURER
Diann Barbacci, LEED® AP
Green Property Solutions

DIRECTORS

Bae-Won Koh, LEED® AP BD+C
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Chris Butlak, LEED® AP
Barringer Construction

Kim Wike, LEED® AP
CaraGreen, LLC

Shaun Ferguson
Morgan Stanley Wealth
Management

Tom Dorsey, LEED® AP BD+C
Wells Fargo Bank, NA

Tom Foster, LEED® AP
Commissioning WorCx

Wendy Cockerham, LEED® AP BD+C
Weaver Cooke Construction

Will Senner, LEED® AP BD+C
Skanska USA Building

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Raleigh, NC 27699-4325

RE: Letter of Support for NCSEA's Request for Review and Modernization of
Rules Governing Access to Customer Energy Usage Data
(Commission Docket No. E-100, Sub 137)

Honorable Chairman and Commissioners:

My name is Keith Pehl. I am State Subcommittee Chair for USGBC North Carolina Advocacy Committee. United States Green Building Council is an organization whose impact is both global and local, including in North Carolina. As the leading voice of the 21st Century building economy, USGBC and its strong community of member companies, partners and advocates look forward to working with you.

I have read the North Carolina Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137. In the initial Comments, NCSEA requests that you commit to opening a separate rulemaking docket in which the following aspects of regulatory modernization can be commented on and innovatively moved forward as appropriate:

- Making meter-level electricity consumption, load profile, and billing history data more accessible to customers;
- Making meter-level electricity consumption, load profile, and billing history data more accessible to third-parties; and
- Making aggregated/de-identified electricity consumption, load profile, and billing history data more accessible to third-parties.



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Stephen Thomas, LEED AP
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SECRETARY
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Parker Poe Adams & Bernstein LLP

TREASURER
Diann Barbacci, LEED AP
Green Property Solutions

DIRECTORS

Bae-Won Koh, LEED AP BD+C
Innovative Design, Inc.

Chris Butlak, LEED AP
Barringer Construction

Kim Wike, LEED AP
CaraGreen, LLC

Shaun Ferguson
Morgan Stanley Wealth
Management

Tom Dorsey, LEED AP BD+C
Wells Fargo Bank, NA

Tom Foster, LEED AP
Commissioning WorCx

Wendy Cockerham, LEED AP BD+C
Weaver Cooke Construction

Will Senner, LEED AP BD+C
Skanska USA Building

I am writing to express USGBC support for NCSEA's request that the Commission call for and lead an effort to review and modernize; where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to USGBC for the following reason(s): The North Carolina marketplace is increasingly demanding better, greener real estate. USGBC is focused on making green building the market norm. Working closely with Building Owners and Managers Association, the Real Estate Roundtable and the Institute for Market Transformation to help implement new standards to the existing policy by forming the Data Access and Transparency Alliance (DATA), a group that advocates for access to whole building energy consumption information.

Modernizing the Energy Data Access policy, allowing access to energy data from utilities for all buildings to all building users, customers as well as third-parties, would help identify opportunities to lower energy bills and energy consumption through efficiency improvements.

I know the Commission is extremely busy, but USGBC believes a review and modernization of the rules that govern access to customer energy usage data is important and merits the Commission's time and attention in the near-term. We are looking forward to supporting you and your community in your efforts to pursue a brighter future and a more sustainable and prosperous world.

Respectfully submitted,

Keith G. Pehl, P.E.
USGBC North Carolina Advocacy Committee
State Subcommittee Chair