



**NC SUSTAINABLE
ENERGY ASSOCIATION**

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**NCSEA's Compiled Consumer
Statement of Position Letters**

MAR 25 2013

March 26, 2013

Clerk's Office
N.C. Utilities Commission

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.

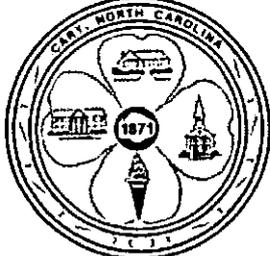
NCSEA recognizes that the Commission may view NCSEA as a single stakeholder. To assure the Commission that NCSEA's request is representative of a diverse spectrum of stakeholders' desires, on 12 February 2013 and on 8 March 2013, NCSEA compiled and filed over 30 letters from academic and governmental institutions, businesses, innovation- and energy-focused membership organizations, and individuals. NCSEA now supplements its earlier compilations with the two letters attached hereto. The first table below lists the two letters' authors and the organizations they represent or with whom they are affiliated. For ease of reference, the second table below contains information for the previously submitted letters.

(2)
Full name.

Author	Author's Title	Representing or Affiliated (Present or Past) With:
Nancy McFarlane	Mayor	
Luis G. Martinez	Senior Energy Attorney, Energy and Transportation Program	

Author	Author's Title	Representing or Affiliated (Present or Past) With:
Jim Hawley	General Counsel & Senior VP, State Policy	
Maggie Ullman	Sustainability Program Manager	
Jacqueline L. Patterson	Principal and Owner	
John A. Hobbes	Regional General Manager - Southeast	

Michael Regan	Associate Vice President	 <p>EDF ENVIRONMENTAL DEFENSE FUND™ Finding the ways that work</p>
Mandy Mahoney	Vice President	 <p>SEEA SOUTHEAST ENERGY EFFICIENCY ALLIANCE</p>
Shannon G. Smith	CEO	 <p>ABUNDANT POWER Smarts Capital for Clean Energy</p>
Stephen S. Kalland	Executive Director	 <p>NORTH CAROLINA Solar Center</p>
Anne McKibbin	Policy Director	 <p>CNTenergy Community Focused Innovation</p>
Jeffrey E. Ramsdell, Ph.D., P.E.	Professor and Director of the Appalachian Energy Center	 <p>Appalachian STATE UNIVERSITY.</p>
Melissa McHale, Ph.D	Assistant Professor of Urban Ecology	 <p>NC STATE UNIVERSITY DEPARTMENT of FORESTRY and ENVIRONMENTAL RESOURCES</p>
Lucas Fishback	CEO/Founder	 <p>plotwatt™</p>
John Richardson	Sustainability Officer	Town of Chapel Hill

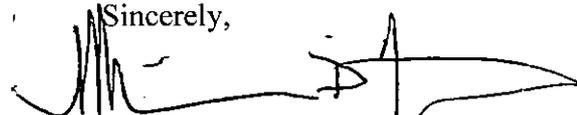
Justin Segall	Founder and Executive Vice President	
Philip Azar	Executive Director	
Kenneth N. Szymanski	Executive Director	
Tom Plant	Vice President, State Policy	
Cameron Brooks	President of Tolerable Planet Enterprises; past Vice President of Policy, Tendril	 Tolerable Planet Enterprises Tendril Inc.
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	 UNC School of Government

<p>Tobin L. Freid</p>	<p>Sustainability Manager</p>	 <p>DURHAM 1 8 6 9 CITY OF MEDICINE</p>
<p>Stephen J. Morgan</p>	<p>President</p>	 <p>clean energy solutions </p>
<p>Keith G. Pehl, P.E.</p>	<p>USGBC North Carolina Advocacy Committee, State Subcommittee Chair</p>	 <p> NORTH CAROLINA</p>
<p>Mark Chilton</p>	<p>Mayor</p>	 <p>TOWN OF CARRBORO MARCH 2, 1974 NORTH CAROLINA</p>
<p>Ward Lenz</p>	<p>Director of the Energy Division of the N.C. Department of Commerce</p>	<p>North Carolina Energy Office energync.net </p>
<p>Rogelio Sullivan</p>	<p>Managing Director</p>	<p>NC State University </p>
<p>Gregory F. Warren</p>	<p>President</p>	 <p><i>Building Homes, Creating Opportunities In the Triangle Area Since 1974</i></p>
<p>Craig Diamond</p>	<p>Executive Director</p>	 <p>CLEAN ENERGY FINANCE CENTER</p>

Daniel S. Fogel, Ph.D.	Faculty Member; Owner of SP3	Wake Forest University 
Cliff Majersik	Executive Director	

NCSEA would also briefly call the Commission’s attention to the 18 March 2013 report released by the American Council for an Energy-Efficient Economy (ACEEE) that highlights 16 policies that remove market barriers across the economy to investments in energy efficiency.¹ One of the 16 policies is “Improved access to energy data.” The report’s executive summary provides (pp. 4-5):

Households, businesses, and institutions can make more-informed energy decisions if they have better information about their energy use and potential savings. Specifically, the more accessible, relevant, and accurate the information, the more easily energy customers can make economically wise and energy-efficient decisions about their operations and capital investments. Utilities are the traditional custodians of energy data, providing buildings with metering equipment to measure energy use and capturing data for billing and other business purposes. Greater access to energy data by customers, energy efficiency service providers, and software entrepreneurs will spur innovation in programs and services that will help close the information gap for customers. Information should only be made available to third parties with the permission of the customer. Policies ought to reduce regulatory barriers to customer data access at the utility and customer level to ensure that customers, utilities, and third-party applications have accurate information to inform the market.

Sincerely,

Michael D. Youth
Counsel & Policy Director

¹ The report is available electronically at <http://aceee.org/research-report/e136> (viewed on 23 March 2013).



City Of Raleigh
North Carolina

Nancy McFarlane
Mayor

March 19, 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 Nancy McFarlane, Mayor of the City of Raleigh, a Municipal Corporation representing approximately 420,000 citizens with an annual budget of \$672 Million, and an annual expenditure for electricity of approximately \$16.5 Million. Raleigh was recognized in 2011 as the US Chamber of Commerce's Most Sustainable Mid-Sized City in the US, and is generally acknowledged in North Carolina as in the forefront of energy management and conservation for the benefit of our citizens.

On behalf of the Raleigh City Council and our citizens, I am writing to offer support for the efforts of the NC Sustainable Energy Association's ("NCSEA") initial Comments in Commission Docket No. E-100, Sub 137 requesting 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.

As public officials, we strive for openness and transparency in all matters relating to our citizens, taxpayers and rate payers. The Commission opening a dialogue to allow for the review and appropriate modernization of the rules is relevant and important to the City and to our many private sector energy conservation and renewable energy partners for the following reason(s):

- The City is in the midst of an implementation of the Electronic Data Interface (EDI) with Progress Energy. This system allows very detailed transparency and management of meter and bill-level data of our usage and billing characteristics. When fully implemented this will be an outstanding tool to allow us to better manage our own internal energy demand and better participate in programs to reduce peak load requirements for our partner Progress Energy. We look forward to the implementation of EDI throughout NC among municipalities and also hope that this will result in better access to data from each individual customer's standpoint and in aggregate in communities and market niches throughout the state
- We often partner with third-party private sector companies regarding energy conservation and renewable energy projects, and the ability to benchmark our use against other similar enterprises, develop business cases for specific partnership projects and expand our programs into our broader community will all be enhanced by access to community-wide energy use data.

- The City believes that providing energy usage data to customers will better enable them to optimize their energy usage/efficiency. Benefits include reduced energy costs, enhanced resiliency, improved energy security, reduced fossil fuels, reduced adverse environmental and health impacts, and increased job growth.

We are confident that this data transparency regarding energy demand and use will result in better management of this critical resource, more job-creating partnerships in our communities with new energy-related industries, and more conscientious energy use by our citizens.

We know the Commission is busy and appreciate your thoughtful consideration of our comments. The Raleigh City Council 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 that reads "Nancy McFarlane". The signature is written in a cursive, flowing style.

Nancy McFarlane
Mayor



NATURAL RESOURCES DEFENSE COUNCIL

March 21, 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 Luis G Martinez. I am Senior Energy Analyst in the Energy and Transportation Program of the Natural Resources Defense Council (NRDC). NRDC is a nonprofit, non-partisan environmental advocacy group founded in 1970 with a mission of safeguarding the Earth, its people, its plants and animals and the natural systems on which all life depends. NRDC has over 35,000 members and online activists in North Carolina and over 1.3 million members and online activists nationwide.

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.

NATURAL RESOURCES DEFENSE COUNCIL

I am writing to express NRDC'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 NRDC for the following reason(s): With reasonable confidentiality protections in place, access to energy usage will enable measurement and tracking total energy consumption (a process known as benchmarking), and evaluate energy efficiency opportunities and make energy improvements that save energy and money. This access will remove a major barrier to energy efficiency.

I know the Commission is extremely busy, but NRDC 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,



Luis G. Martinez
Senior Energy Attorney
Energy and Transportation Program
Natural Resources Defense Council