



City of Asheville
Office of the Mayor

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April 4, 2024

Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300
Electronic Submission

Re: North Carolina Utilities Commission Docket NO. E-100 Sub 161

Dear Chair Mitchell and Commission Members,

The City of Asheville appreciates the opportunity to provide additional comments on the proposed rules to address customer data access issues in Docket No. E-100 Sub 191.

We would like to acknowledge and thank Duke Energy for their engagement and improvements to the online business portal to date. Specifically, we appreciate the ability to increase the number of users with online access, including 3rd party providers the City approves. As a large energy customer, the City of Asheville has diverse data access needs from multiple departments ranging from Facilities Maintenance monitoring building performance to Finance managing accounts payable to Sustainability tracking energy efficiency projects, solar energy generation, and measuring greenhouse gas (GHG) emissions.

However, challenges still remain for the City of Asheville to access our utility data in an electronic, machine-readable format. Specifically, the City of Asheville still requests additional revisions to require that the frequency interval of data is commensurate with the meter or network technology used to serve the customer, and no less frequent than hourly if the meter is billed for demand. Having the ability to analyze our own data, including sub-hourly interval data that is reliably downloadable and not time-shifted, enables the City to measure the impact of our investments in energy efficiency, onsite solar generation, and demand reduction efforts. Additionally, collective billing should not limit our access to the "Download My Data" function which currently prevents us from accessing high-resolution smart meter data.

The City of Asheville also values and agrees that individual customer data privacy must be protected, and individual data access without permission must be avoided. However, the City of Asheville has adopted aggressive climate change goals and the strategies to achieve these goals

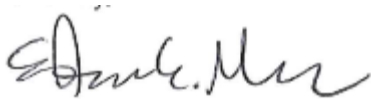
and measure our progress require access to utility data. This is why the City of Asheville supports the provision in the Attorney General's Office's proposed rule that would expand Duke Energy's ability to share aggregated data, which would improve our ability to measure program effectiveness and monitor progress toward our climate change goals.

To further enhance our work, the City of Asheville also supports the Public Staff's proposed R8-51(g) to have a customer consent form authorizing the disclosure of customer data on Duke Energy's website. We recommend standardizing the format in which customer data is received and establishing a standard waiting period between when the request is submitted and when data is supplied. The City of Asheville, in partnership with Buncombe County and Green Built Alliance, has collaborated with Duke Energy over the past six years to develop a utility release form and gather that data to inform the measurement and verification of our low income weatherization program, Energy Savers Network. To date, it has been challenging to maintain access to this data as the form has seen many iterations, and receipt of the data has varied in format and time to process the request. This makes it difficult to measure and verify the program's effectiveness as well as inform program improvements.

The Energy Savers Network is just one program example among many that the City supports to transition our community to a clean energy future. Access to customer's data, both aggregated to protect privacy or at the household/business level with the customer's permission, allows the City of Asheville to use our limited resources to their fullest extent to reduce costs, and greenhouse gas emissions, within municipal operations and for our community members.

Please contact us if you have any questions concerning this filing.

Sincerely,

A handwritten signature in dark ink, appearing to read "Esther E. Manheimer". The signature is fluid and cursive, with the first name "Esther" being more prominent than the last name "Manheimer".

Esther E. Manheimer
Mayor, City of Asheville