



City of Asheville
Office of the Mayor

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Dec 18 2019

July 24, 2019

Ms. Kim Jones, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4300
Electronic Submission: kjones@ncuc.net

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

Dear Ms. Jones:

The City of Asheville overall supports the proposed Rule R8-51 and the revision to R8-7 and R8-8. The City of Asheville has adopted aggressive climate change goals and the strategies to achieve these goals and measurements of progress are based on access to utility data. The City of Asheville values and supports that the protection of privacy to individual customer data, without permission, must be maintained.

Specifically, the City of Asheville supports:

1. The availability of aggregated data, at a scale that protects privacy but also provides enough granularity to be useful, including not just energy consumption but data on energy efficiency program participation. This is invaluable in measuring and tracking carbon emissions citywide. It is also especially useful when the City of Asheville considers supporting public energy efficiency or weatherization programs as it has done for the past two years through the Blue Horizons Project.
2. Posting a standard utility release form on the website. The City of Asheville, in partnership with Buncombe County, is currently implementing a grant funded low income weatherization program where having this standard release form readily available would have enabled the Energy Upgrade program to enroll more residents.
3. Requiring that customers utility data be available in an electronic, machine readable format. The City of Asheville has an 80% carbon reduction goal for municipal operations by 2050 from a 2008 baseline. To date, the City of Asheville has reached 31% of that goal primarily through energy efficiency. Having the ability to streamline the analysis of our own data through electronic analytic tools, such as Google Sheets, saves the City energy and money.

However, the City of Asheville, does have some proposed revisions based on the challenges the City has experienced in processing our own utility information as a large customer.

1. R8-8, general comments:

- o Require that bill forms are available in both electronic and paper form. Allowing the utility to provide data by either paper or electronic form makes it more difficult for the customer. Requiring an electronic form to be available would streamline the customers ability to process utility consumption and the associated cost.

2. R8-51 d), suggested language revisions:

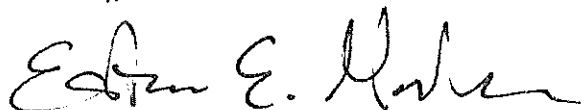
- o The frequency interval of data must be commensurate with the meter or network technology used to serve the customer, and no less frequent than hourly if the meter is billed for demand.
- o Standard customer data shall be maintained and transmitted in electronic machine-readable form that conforms to nationally-recognized standards and best practices.

3. R8-51, general comments:

- o "Customer Data" should also include individual rates or charges associated with the rate schedule for each unit of service and any other recurring or non-recurring charges that apply to the customer's bill
- o 3rd party access, when granted by the customer, should not render a fee for access. As a large customer, the City of Asheville contracts with a 3rd party provider to import our utility data into a software program to assist in measuring carbon emissions and energy consumption. There should not be an extra fee to allow that party to access the information directly, with permission.
- o Electronic format should be the default and only provide paper if explicitly requested by the customer. It should not be up to the utility to decide if they can provide electronic data or not. The data is not useful in paper form.
- o A limit should be applied to the timeline for processing requests.

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

Sincerely,



Esther E. Manheimer

Mayor, City of Asheville