



NC SUSTAINABLE
ENERGY ASSOCIATION

NCSEA's Compiled Consumer
Statement of Position Letters

March 8, 2013

FILED

MAR 08 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

OFFICIAL COPY


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

Dear Honorable Chief Clerk and Commissioners:

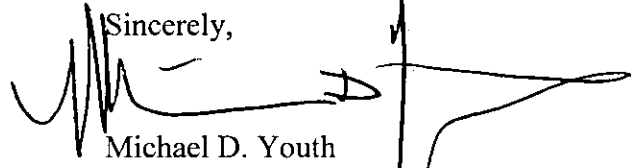
On 7 February 2013, NCSEA filed its initial comments in this proceeding. In those comments, NCSEA asserted that the Commission should consider promulgating rules permitting greater access to utility-held customer energy usage data. Such rules would enable (1) academic and governmental institutions to 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, NCSEA compiled and filed over 20 letters from academic and governmental institutions, businesses, innovation- and energy-focused membership organizations, and individuals. NCSEA now supplements its earlier compilation with the letters attached hereto. The table below lists the letters' authors and the organizations they represent or with whom they are affiliated.

ym
AG
7comm
Watson
Green
Duffley
Conrad
Hoover
Lute
Hilburn
Sessions
Jores
Ericson
Hodge
Gubel
JPsec
2PSACTS
3PSlogal
3Pselect

Author	Author's Title	Representing or Affiliated (Present or Past) With:
Mark Chilton	Mayor	
Ward Lenz	Director of the Energy Division of the N.C. Department of Commerce	North Carolina Energy Office energync.net 
Rogelio Sullivan	Managing Director	NC State University 
Gregory F. Warren	President	 <i>Building Homes, Creating Opportunities In the Triangle Area Since 1974</i>
Craig Diamond	Executive Director	 CLEAN ENERGY FINANCE CENTER
Daniel S. Fogel, Ph.D.	Faculty Member; Owner of SP3	Wake Forest University 
Cliff Majersik	Executive Director	

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael D. Youth'. The signature is stylized with a large, sweeping 'M' and a long horizontal stroke that extends to the right and then loops back down.

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



TOWN OF CARRBORO

NORTH CAROLINA

WWW.TOWNOFCARRBORO.ORG

OFFICIAL COPY

February 5, 2013

Chief Clerk
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Raleigh, NC 27699-4325

FILED
FEB 14 2013
Clerk's Office
N.C. Utilities Commission

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 Mark Chilton. I am the Mayor for the Town of Carrboro. 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.

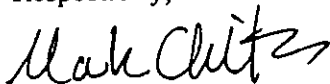
I am writing to express the Town of Carrboro's support for NCSEA's request that the Commission call for and lead an effort to review and modernize, where appropriate, the rules that govern access to customer energy usage data.

Review and appropriate modernization of the rules is relevant to the Town of Carrboro for the following reason(s): The Town has several different initiatives for which both improved meter level and aggregated energy consumption information would be very helpful. The Town is a

party to the Mayor's Climate Protection agreement and has adopted its own climate protection resolution, which necessitates ongoing town wide updates and monitoring of energy consumption and greenhouse gas emissions. In addition, the Town has recently created an energy efficiency in buildings program (Worthwhile Investments Save Energy, or WISE), which necessitates tracking of energy use and improvements in efficiency. The process for accessing this data from our utility providers is a barrier to participation in the program; any improvements in access would support the program. Finally, the Town is exploring with other parties the establishment and participation in a Regional Energy Alliance. At the early meetings of interested parties, the theme of difficulty in accessing this information has been a universally expressed challenge. More broadly, with better access to energy usage information, Carrboro and other jurisdictions could enhance a variety of efforts such as prioritizing areas to extend programs with incentives, educations, and/or technical assistance. In the absence of support from the Commission and regulated utility providers, we lack a fundamental resource: localized up to date and reliable data.

I know the Commission is extremely busy, but the Town of Carrboro 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,



Mark Chilton

Mayor



North Carolina Department of Commerce Energy Division

Pat McCrory, Governor

Sharon Allred Decker, Secretary
Ward Lenz, Energy Division Director

February 26, 2013

Chief Clerk
North Carolina Utilities Commission
Dobbs Building
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RE: Letter of support for the N.C. Sustainable Energy Association'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 Ward Lenz, director of the Energy Office in the North Carolina Department of Commerce. I write to lend my support to the N.C. Sustainable Energy Association's request for review and modernization of rules governing access to customer energy usage data **(Commission Docket No. E-100, Sub 137)**.

Greater access to this information would provide important tools to help the Energy Office, along with other organizations in our state's energy sector, develop more accurate analysis by knowing more details about residential electric use. The Energy Office works on behalf of all of the state to develop and support initiatives that save energy and make the most effective use of our resources. This office works closely, across the energy spectrum, with regulated electric and natural gas utilities, traditional energy companies, renewable and alternative energy advocates as well as environmental and consumer groups, to develop and promote robust energy efficiency programs that serve our state's residents.

The request by the N.C. Sustainable Energy Association would provide the kind of detailed information that would help the Energy Office -- which houses the state's Weatherization Assistance Program -- as well as programs it supports, create and implement effective initiatives that will save North Carolina consumers money on their utility bills and help them become more efficient energy users.

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Raleigh, North Carolina 27604

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We are just on the doorstep of widespread deployment of Smart Grid and other innovative energy-use technologies. Greater access to appropriate consumer energy use data will help spur greater innovation and help North Carolina residents become more aware energy consumers and help control their utility bills. In addition, economic development and job expansion in North Carolina's Smart Grid sector, already a significant presence, will be enhanced when these growing companies have greater tools to test their technologies and products.

A review and modernization of the rules governing customer energy usage will provide long-term benefits to consumers and, again, urge the commission to take up this request from the N.C. Sustainable Energy Association.

Sincerely yours,

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

Ward Lenz, Director



FREEDM Systems Center
An NSF Engineering Research Center

NC STATE UNIVERSITY

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Progress Energy Distinguished Professor of
Electrical and Computer Engineering
Director, FREEDM Systems Center
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February 28, 2013

Chief Clerk
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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 Rogelio Sullivan. I am the Managing Director of the FREEDM Systems Center at NC State University. The Future Renewable Electric Energy Delivery and Management (FREEDM) Systems Center is an Engineering Research Center that is focused on developing and commercializing grid modernization technologies. FREEDM combines a focus on energy research, education programs, and industry engagement and innovation activities to develop and demonstrate advanced electric power system technologies.

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:



FREEDM Systems Center
An NSF Engineering Research Center

- 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 research and education activities such as FREEDM for the following reason(s):

- Energy use data can support research efforts aimed at developing improved programs for home energy management.
- Workforce training efforts will benefit from real world aggregate electricity demand data.
- Start-ups can better quantify the energy saving potential of their innovations with actual region-specific load profile data.
- Education efforts at the undergraduate and graduate levels will benefit from having access to better data to use in computer simulations and training exercises.

I know the Commission is extremely busy, but I believe that 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,

Rogelio Sullivan

FREEDM Systems Center

North Carolina State University



Building Homes,
Creating Opportunities
In the Triangle Area Since 1974

February 20, 2012

Board of Directors

Sam Crutchfield
Chair

Dr. Norman Camp
Vice Chair

Angela Connor

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Roland Gammon

Gary Blum

Paul Morris

James West, III

Glenn French

Angel Wright-Lanier

Daniel T. Blue, III

Ralph Recchie

Charles Rodman

Evan Covington Chavez

Gregory F. Warren
President

Chief Clerk
North Carolina Utilities Commission
430 North Salisbury Street

Dobbs Building
Raleigh, NC 27603-5918

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Raleigh, NC 27699-4325

Subject: 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 Gregg Warren and I am President of DHIC, Inc. a 39- year old non-
profit developer of affordable housing in the Raleigh area. We own over
1,600 apartments in North Carolina serving low income seniors and working
families.

DHIC is committed to providing quality, homes which provide healthy living
environments that are energy efficient. In the past two years, we have
completed three apartment developments in Wake County:

- **Highland Terrace in Cary** offers 68 one and two bedroom apartments
to low income seniors 55 years of age or older. This development is Wake
County's first LEED certified (Gold) multifamily property built in Wake County.

- **Meadowcreek Commons in Raleigh** is comprised of 48 apartment
homes and is LEED Silver Certified.

- **Water Garden Village in Raleigh** contains 48 one two and three
bedroom apartments for lower income families. We expect that this
development will attain LEED Gold Certification.

We are proud to serve as a leader in building healthy, energy efficient homes
and know that we are offering our residents significant savings through
reduced rents and lower electric bills. The problem is that we don't know
how much we are saving our residents because we don't have easy access to
electric consumption levels and billing history.

DHIC supports the North Carolina Sustainable Energy Association's ("NCSEA") initial comments in Commission Docket N. E-100, Sub 137. Opening up rules that govern customer energy usage data will go a long way to help us measure the positive impact that our investments offer to our residents. Our affordable housing developments are financed by a mix of local and state government loans, private equity and loans from financial institutions. We need to be able to demonstrate that our initial capital investments in energy savings technologies have a measurable payback. Furthermore, we want to be able to track consumption levels over time to make sure that our buildings are performing properly over the long term.

I have colleagues in other States that develop affordable housing and they already have access to the type of information requested by NCSEA. In fact, some apartment owners have real time "dashboards" showing actual utilization levels in each apartment unit.

I would encourage the Commission to place on their agenda a review of the rules that govern access to energy usage data.

Thank you,

A handwritten signature in black ink, appearing to be 'G. Warren', with a long horizontal flourish extending to the right.

Gregory F. Warren
President



CLEAN ENERGY
FINANCE CENTER

March 4, 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 Craig Diamond. I am Executive Director of the Clean Energy Finance Center, and 501(c)(3) nonprofit organization with the mission of dramatically expanding private sector investment in energy efficiency and small-scale renewable energy. We work with stakeholders at a state and local level to develop effective and sustainable financing solutions for clean energy programs. One of the key requirements for making private sector capital affordable and easily accessible to residential and commercial borrowers is better stakeholder access to, and collection and analysis of, energy use data from utilities and other sources.

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 important because a variety of stakeholders will benefit significantly from access to energy use data, particularly at the neighborhood and community level. Many states and municipalities across the country increasingly are recognizing the importance of energy use data, and are moving forward with initiatives, and new rules and policies, to make energy use data available with the appropriate safeguards for privacy.

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

Respectfully submitted,



Craig Diamond

Executive Director

Clean Energy Finance Center

March 4, 2013

Chief Clerk
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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 Daniel S. Fogel. I am faculty member at Wake Forest University Schools of Business and Center for Energy, Environment, and Sustainability. Also, I own a company called SP3 that works with various organizations on their environmental sustainability issues. This letter represents my personal view; it is not intended to represent Wake Forest University. It does represent the point of view of SP3.

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 to conduct research on energy efficiency and alternative energy sources.

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.

This review and data usage will benefit many people in our state and set a world-class point of reference for North Carolina.

Respectfully submitted,

Daniel S. Fogel, PhD

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Charlotte, NC 28202

704-604-0085

fogelds@wfu.edu

dan@sphree.com



Promoting energy
efficiency in buildings

March 7, 2013

Chief Clerk
North Carolina Utilities Commission
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4325 Mail Service Center
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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 Cliff Majersik. I am the Executive Director of Institute for Market Transformation (IMT). IMT is a Washington, DC-based nonprofit organization promoting energy efficiency, green building, and environmental protection in the United States and abroad. Our activities include technical and market research, policy and program development, and promotion of best practices and knowledge exchange. One of IMT's focuses is to provide technical assistance to policymakers and research best practices on policies that make building performance more transparent. In this capacity, IMT is currently working with over 30 jurisdictions. IMT also works with utilities, regulators, policymakers, and real estate industry stakeholders to promote electronic access to whole-building consumption data.

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 IMT'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.



Promoting energy
efficiency in buildings

Review and appropriate modernization of the rules is relevant to IMT for the following reason(s): IMT works with several cities, including Raleigh and Charlotte, on policies that seek to improve building energy performance transparency. Recent studies have shown that building benchmarking—the process of tracking the energy performance of building and comparing it to itself over time, a norm, or a group of peers—is critical for motivating energy efficiency improvements and leads to energy savings. EPA has analyzed the energy performance of more than 36,000 buildings that input their complete energy performance data into Portfolio Manager and received ENERGY STAR performance scores (any score on the 1 to 100 point scale) in all four of the years 2008 through 2011. Over this period, the buildings in the study attained average annual energy savings of 2.4 percent.¹

However, for building owners and operators to be able to benchmark and effectively manage a building's energy use, they need whole-building data, which is often difficult to obtain due to privacy laws and utility confidentiality policies that may require building owners to acquire consent from each and every tenant. Making aggregated consumption data, which would protect individual tenant privacy, accessible to building owners in a convenient format would remove this barrier and increase the likelihood of owners benchmarking.

Improving data access for building owners also provides benefits for utilities. Building owners that are aware of their energy performance are more likely to identify and implement energy efficiency measures—providing energy data can thus be a gateway to other energy efficiency programs.

Better access to energy data is crucial for improved energy management. I know the Commission is extremely busy, but IMT 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 "Cliff Majersik". The signature is fluid and cursive, with the first name "Cliff" being larger and more prominent than the last name "Majersik".

Cliff Majersik
Executive Director
Institute for Market Transformation (IMT)

¹ Environmental Protection Agency. "Benchmarking and Energy Savings."
http://www.energystar.gov/ia/business/downloads/datatrends/DataTrends_Savings_20121002.pdf?3d9b-91a5.