

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking Concerning
Energy Efficiency Rolling Portfolios,
Policies, Programs, Evaluation, and
Related Issues.

R. 13-11-005

(Filed November 13, 2013)

**COMMENTS OF THE LOCAL GOVERNMENT SUSTAINABLE ENERGY
COALITION ON THE ADMINISTRATIVE LAW JUDGE'S DECISION ADDRESSING
ENERGY EFFICIENCY THIRD-PARTY PROCESSES AND OTHER ISSUES**

/s/ Steven Moss

Steven Moss

Consultant on behalf of Local Government Sustainable Energy Coalition

296 Liberty Street

San Francisco, CA 94114

(415) 643-9578

For THE LOCAL GOVERNMENT
SUSTAINABLE ENERGY COALITION

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About LGSEC

The Local Government Sustainable Energy Coalition (LGSEC) represents ten cities, ten Counties, four Council/Association of Governments, four Regional Agencies, two Community Choice Aggregators, one university, and seven nonprofits. Collectively, LGSEC members represent roughly two-thirds of California's population and electricity demand. LGSEC members serve as administrators, designers and lead implementers of a host of energy efficiency, demand response, building decarbonization, transportation electrification and other energy management programs.

Local governments have authority over development, land use, permitting, infrastructure, local codes and programs, municipal programs and facilities. Local governments are the first line of defense and the providers of last resort when it comes to disaster preparedness and emergency response.¹

Comments on CATALENA

LGSEC applauds the California Public Utilities Commission (CPUC) for identifying a clear path to the oversight, funding, and expansion of the CATALENA tool. As LGSEC stated in opening comments on the ALJ Ruling on third party programs and other issues,

“the CATALENA tool underscore[s] the continuing need for additional local government capacity and resources to develop climate action, local hazard mitigation, resilience, and

¹ LGSEC 2023-2023 Policy Platform. <https://lgsec.org/wp-content/uploads/2022/04/LGSEC-2022-2023Policy-Platform.pdf>

emergency response plans...[however], the goal of making critically needed information available to suitable stakeholders has not yet been obtained.”²

We are confident that further collaboration between State agencies and local governments will result in the data needed to plan to decarbonize by 2045.

LGSEC commends the CPUC for appropriately identifying the California Energy Commission (CEC) as responsible for managing CATALENA and expanding the tool’s DER capabilities. However, local governments still do not have viable means to obtain the data granularity required to meet State law related to climate action planning. To illustrate this point, the table below shows that, in the UCLA Energy Atlas for Southern California, a large portion of data is masked due to current data aggregation rules.

Table: Percentage of Masked Data by Building Type in the Southern California Energy Atlas³

Building Type	Electricity: % cities of masked:	Natural Gas: % of cities masked:	GHG: % of cities masked:
Agriculture	41%	35%	42%
Commercial	13%	26%	26%
Residential	0%	2%	1%
Industrial	42%	71%	66%
Institutional	63%	83%	77%

² LGSEC Comments. P7.

<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M496/K435/496435795.PDF>

³ Data is from the 6 counties within the Southern California Energy Atlas:

<https://energyatlas.ucla.edu/data>

A city simply cannot set a greenhouse gas (GHG) inventory baseline with masked data. The table above shows, for example, that 26% of cities cannot even be assigned an aggregate GHG value in the commercial sector, which renders climate action planning impossible.

LGSEC is optimistic that local governments can identify and effectuate data access pathways in collaboration with the CEC and its CATALENA management role, but cautions that every aspect of the PD implementation could positively or negatively impact this issue.

For example, order paragraph 13 states that the CPUC and CEC shall create a memorandum of understanding (MOU) and notice the relevant service list within 15 days of its execution. LGSEC recommends that the MOU or agreement in no way limit local government access to data specified in D.14-05-016 use case 1 “local governments seeking access to aggregate data for use in creating legislatively required Climate Action Plans and [for] implementation of EE programs.” To date, neither the energy data request portals (EDRP), nor the Energy Atlas have been able to provide data to meet this use case due to the aggregation limitations discussed above. LGSEC encourages the CPUC to recognize, as a finding of fact, that use case 1 in D.14-05-016 cannot be met under the current data access rules.

LGSEC commends the CPUC for allocating \$2 million to implement CATALENA. This funding should be used, in part, to ensure that the unique data requests required for local government climate planning can be addressed. Furthermore, we urge the CEC to leverage the investments it has already made in data infrastructure over the last decade, including harnessing in-house CEC software, as well as third-party academic research used to develop the Energy Atlas, which links consumption to a range of critical geospatial data, including building

attributes and socio-economic metrics. By effectively coordinating the diversity of efforts it has made in this realm, the CEC would enable public agencies to make meaningful progress on setting baselines and identifying interventions that will lead to decarbonizing our communities by 2045.

Respectfully submitted by:

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