

BEFORE THE CALIFORNIA ENERGY COMMISSION

AB758: Comprehensive Energy Efficiency Program for Existing Buildings Draft Action Plan

Docket Number 12-EBP-1  
(Filed July 12<sup>th</sup>, 2013)

COMMENTS OF LUCID DESIGN GROUP, INC. ("LUCID")

**Background**

Thank you for the opportunity to comment on the draft action plan. We were pleased to hear about the public workshops and were grateful that they were webcast as well, since physical proximity is always a barrier to participation.

Lucid is a software company based in Oakland, California. Our software helps building owners collect, manage and act upon energy data from their facilities. There is a wealth of data contained within building automation systems, submeters, inverters, lighting control systems, utility meters, etc., but it is costly to extract and difficult to manage as a portfolio owner. We have over 300 customers and monitor thousands of buildings worldwide on behalf of universities, large corporations, state and local government, and commercial real estate customers. In California we have over 50 customers including Google, Los Rios Community College District, USC, and many others.

Since our business is primarily concerned with energy data acquisition and management for our customers, our comments fall into themes of data access, standardized data formats, and public disclosure of commercial building annual energy usage.

We were glad to see **Data Reporting and Management** as the first "no regrets" strategy in the draft action plan, and we welcome these efforts. But we urge the Commission to differentiate access to aggregated customer data or program effectiveness measures from the access to individual customer's data. Individual customer's data is the starting point for energy efficiency in buildings: it is absolutely essential to scoping (and ultimately verifying) an efficiency project. Aggregated numbers on energy usage across climate zones or building types is mostly useful for retrospective analysis – a valuable, but

different, goal. *We are not going to be successful in reaching California's aggressive carbon goals if the ability of customers to access their own individual data in a machine-readable format is stalled by, or held hostage to, larger policy decisions about access to aggregated data.* Privacy, while an important concern, is in our view a non-issue when a customer wants to access *his or her own data*, whether from smart meters or “dumb” ones. For instance, it is a disappointment to the citizens of California that, after billions of dollars were spent on smart meters, customers still, in 2013, do not have access to their own data in an automated, machine-readable format. Green Button is a helpful first start, but Green Button Connect (automated transmission to a third party at the customer's direction) is a prerequisite. Green Button Connect is currently stalled as we wait for a CPUC decision. While we understand the CEC is a different body than the CPUC, we believe CEC's success or failure in implementing the Legislature's requirements in AB 758 hinges in no small way on the availability of Green Button Connect throughout the state. Therefore, we ask that the CEC (a) encourage your CPUC colleagues to separate the issues of individual data and aggregate data (e.g., the “energy data center” should be evaluated on an altogether different administrative track than Green Button Connect), and to expedite the adjudication of the “Customer Data Access” proceeding (CPUC A12-03-002) so that the customer benefits from Green Button Connect can be realized and not postponed even further, and (b) integrate Green Button Connect across *all* relevant CEC policies and programs so that the utilities perceive that the state is banking on Green Button Connect and it is not on the sidelines while other arcane methods of energy data transfer continue to be supported.

Finally, with regard to the potential mandatory measure of requiring public disclosure of annualized energy data and Energy Star scores of commercial buildings, we strongly believe this should be implemented state-wide as soon as possible. Private, transactional disclosure has a certain benefit, but public disclosure can be achieved at trivial cost to taxpayers and offer enormous benefits.

Respectfully,

Michael Murray  
Chief Executive Officer  
Lucid  
304 12<sup>th</sup> Street, Suite 3C  
Oakland, CA 94607  
(510) 907-0400