

July 1, 2020

TO: CPUC Energy Division, Abhilasha Wadhwa

RE: Post-Workshop Comments on Data Needs for Building Decarbonization

In response to the June 17, 2020 workshop on Accessing Data Needs for Building Decarbonization, the California Solar & Storage Association (CALSSA) submits these informal comments. CALSSA strongly supports the creation of a Data Working Group. The particular data we are most interested in is customer electricity consumption data.

Currently, each of the IOU websites has a portal for customers to download their own “interval data” through Green Button. These portals are frequently out of service. More importantly, many customers lack sufficient computer skills to download a file and send it to a contractor they are working with to design on-site energy facilities. If the contractor is a demand response provider, they may have an API with the utility portals that enables them to download data on an ongoing basis. For a solar and storage contractor, however, building an API is an excessively high bar and they only need data one time.

It is possible to submit a request to the utilities that they send data by email after receiving customer authorization to obtain the data, but this can take as long as 30 days to obtain and the timing is highly unpredictable. It is not possible to provide an acceptable level of customer service when it takes 2-4 weeks to obtain basic information.

The Commission oversaw improvements to the process for demand response providers to register customers. Known as “click-through,” this effort improved the process of linking the websites of demand response providers with the Green Button back end so that customers could give approval for data access with a minimum number of steps.

This is very different from the needs of solar and storage contractors. We need a process to download data that is secure but not high tech. We do not need ongoing updates to customer data. We do not want to link our websites directly with Green Button. We only need to be able to download it when a customer asks us to design a system that meets their needs.

CALSSA recommends creation of a new option for obtaining Green Button customer interval data that involves a download option for authorized third-party vendors. The process would have the following elements:

- A solar provider submits an application to become authorized by the Commission, similar or identical to the process currently used to access Green Button data as a third party.
- Two-step authentication verifies the identity of the solar provider during log-in to the utility website.

- The solar provider uploads a customer authorization form demonstrating that they have permission to access the data.
- The solar provider downloads the data, with options for csv and xml formats.

We understand that participants in the workshop had other important data issues that may form the backbone of a Data Working Group. Better functionality for Green Button could be a simple problem to solve, but it would be a mistake to assume that Green Button data currently works well for all of its intended purposes.

Respectfully,

Brad Heavner  
Policy Director