



To: Abhilasha Wadhwa, CPUC's Energy Division
From: Michael Colvin, Environmental Defense Fund

Informal Comments in Response to June 17, 2020 Workshop

Environmental Defense Fund (EDF) thanks Energy Division staff for the opportunity to present at the June 17, 2020 workshop on data needs as ordered in Decision (D.)20-03-027. EDF believes that the data collected by the CPUC for the purposes of decarbonizing the built environment should be masked, aggregated, and publicly available. EDF also encourages that this data be made available with additional clarity specificity (perhaps with non-disclosure agreements) to help target customers in the deployment of the BUILD and TECH programs.

EDF

Proceedings with Inter-related Data needs

EDF agrees on the importance of all the principles written on slide 18. The coordination and communication between all parties are essential to avoid duplicative efforts. Throughout the pilot program of the BUILD and TECH programs, EDF encourages that all stakeholders should try to avoid duplication of the same data requests. As evidenced by the large number of service lists the June 17 workshop was given to, this gas data could have the potential to touch multiple proceedings.

EDF does not see any reason for customer specific identifying information to be released publicly. Customers may elect to share their data using green button connect or similar processes on a voluntary basis. Regarding system level information, EDF believes that data can be masked and grouped in such a way to address any potential safety or security concerns.

EDF encourages Energy Division to specific exact information that cannot be released with the Gas Safety and Reliability Branch (as mentioned on slide 15) so that will provide very useful information on the gas infrastructures to prioritize electrification for areas where the state could avoid scheduled gas system maintenance or repair. The level of information required for this non-pipeline alternative should be transparent and not reveal any confidential or sensitive information. EDF believes that coordination of this kind will help contain stranded asset costs (as discussed during our presentation).

Framing Data Needs and Use Cases for Building Decarbonization

EDF agrees that community-based and workforce-development metrics are needed for the BUILD and TECH programs. This data could be used to monitor the transition of the gas system to the new decarbonized vision.

Electrification requires different workforce skills and trainings and having gas data made available will help ensure an equitable workforce transition.

EDF agrees that data need to be accessible easily to inform the communities on the benefits of these programs. As indicated by PG&E, actions on the gas system will depend on customer's requests and choices. Gaining the trust of the communities is a major step on the path to electrification and survey on customers satisfaction might be useful. We encourage the measure of community resilience as mentioned on slide 45 and the five-step framework enounced on slide 43. Continuous feedback loops ensure the assessment of the effectiveness of the outreach strategies, the evolution of customer awareness and knowledge and the degree of training provided to contractors, employers, and manufacturers.

Natural Gas infrastructure Data needs in BUILD and TECH programs

Considering the overall value of the gas system will help us targeting strategically offer programs and keeping affordable gas prices. As discussed by Gridworks during their presentation, containing system costs during this transition is critical to keeping costs just and

reasonable for all customers. EDF encourages this information to be as available as possible to both stakeholders and Program Administrators to help contain cost impacts, especially on customers who cannot leave the gas system.

Gas utilities Data

EDF agrees that limited deployment of certain alternative fuels such as biomethane and hydrogen may be appropriate for hard-to-electrify customers, mostly in the large commercial and industrial sectors. However, for the BUILD and TECH programs, electrification of new and existing buildings is the main objective. Therefore, in terms of data, we expect the gas utilities to provide information on the rate of renters and landlords by building stocks to target strategically the deployment of these programs. The challenge is that because renters are seldom the decision makers about appliances or the fuels they use, they are not able to make investments in equipment that would save them money long-term.

In addition, knowing the location of the new gas equipment and future gas equipment is necessary. The remaining book value of the gas infrastructure should also be taken into consideration to influence where the programs get deployed. The costs of maintaining the gas system are a function of the size of the network pipelines and the pressure maintained within them, rather than the quantity of gas moving through the pipes. Unless an entire cluster of customers on a terminal branch of the distribution system gives up gas, the system cannot be pruned. Without shrinking the size of the system, the fixed costs of maintenance are not reduced and will be spread among fewer customers, thereby raising gas prices. The goal is to reduce simultaneously the gas consumption and the costs of maintaining the gas system. An orderly planned transition from gas would have the effects of stabilizing the industry and protecting low-income and gas-dependent consumers. This targeting strategy will also help avoiding new investments in gas system expansion or repairs that will not be recoverable.

This strategy needs to be coupled with a strategy prioritizing low-income housing units.

Criteria for determining appropriate neighborhoods for building electrification should include the following:

- Age of the current system and repair needs: those with most repair needs should be targeted first
- Location within the gas distribution system: communities on distant branches of the distribution system should be targeted before those on main thoroughfare
- Income of the residents: neighborhoods least likely to bear the costs of higher gas prices should be provided early opportunities for electrification.

In conclusion, EDF remains available to Commission Staff as they consider these important issues.

Sincerely

A handwritten signature in black ink, appearing to read "Michael Colvin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael Colvin
Director, Regulatory and Legislative Affairs
California Energy Program
Environmental Defense Fund