



April 28, 2014

Dear Commissioner Peevey,

We are contacting you regarding Use Case 7 in the Proposed Decision in Rulemaking 08-12-009 to ask the Commission to allow utilities to provide building owners and managers with access to whole-building monthly energy usage data for benchmarking upon request.

The Investor Confidence Project is a project of Environmental Defense Fund. EDF is a non-profit working with industry and public sector stakeholders to develop a system to enable investors to more easily invest in energy efficiency projects. We work with a broad array of energy efficiency investors, developers, building owners, and other stakeholders. Our partner base consistently voices the need for data transparency and access.

The industry of energy efficiency retrofitting requires data to drive investment and innovation leading to reductions in energy loads and associated greenhouse gasses. Multi-tenant buildings present a particular challenge, as it is often difficult to get necessary data for benchmarking, base lining, and ongoing measurement and verification. The existing process of obtaining separate consent for each meter is too impractical to be employed which has a significant impact. Changing the requirements to allow building owners to obtain aggregate data would spur a number of beneficial developments.

Access to whole-building data enables project developers and building owners to effectively engineer energy efficiency projects and measure results. In order to develop projects and justify investments, it is imperative that building energy usage can easily be obtained both pre and post project. The current inability to do so creates a significant barrier to creating more and deeper retrofits.

Easier data access would also allow for participation in benchmarking programs allowing California businesses to focus our energies on using benchmark data to manage energy effectively, rather than dedicate resources to cutting red tape. Similarly, many REITs and other large players are currently hampered in tracking and reducing energy use to meet requirements associated with programs such as the Global Real Estate Sustainability Benchmark (GRESB), ULI-GreenPrint Index, or LEED Certification.

Lastly, data is necessary to improve the energy performance of buildings implementing operational and behavioral energy-saving strategies. In order for building engineers to improve existing infrastructure, as well as properly commission newly installed equipment upgrades, it is necessary to make building energy data accessible.

On behalf of Environmental Defense Fund's Investor Confidence Project's partners and allies we ask you to endorse Use Case 7 in the Proposed Decision in Rulemaking 08-12-009 to allow utilities to provide

building owners and managers with access to whole-building monthly energy usage data for benchmarking upon request. Please note that this letter is only commenting on Use Case 7, and not the entire Proposed Decision in Rulemaking 08-12-009.

The following ICP Allied companies and organizations have formally endorsed this letter:

Los Angeles Better Buildings Challenge

Celtic Energy

Clean Fund

Metrus Energy

Carbon Lighthouse

PACENow

Association for Energy Affordability

Retroficiency

Performance Systems Development

Sustento Group

Joule Assets

Sidel Systems

Building Energy

SClenergy

HELIOS Building Efficiency

New York Energy Efficiency Corporation

MJM Energy Consulting

Sustainable Real Estate Solutions

Noesis

Brightpower

Thank you for your time and consideration.

Sincerely,



Matt Golden

Senior Energy Finance Consultant

The Investor Confidence Project

Sincerely,



Brad Copithorne

Director Clean Energy Financing Solutions

The Environmental Defense Fund

List of Endorsing Investor Confidence Project Allies and Partners

	<p>The Association for Energy Affordability is a leading provider of technical services for energy efficiency in buildings. AEA's services include energy audits, modeling, project work scope and specification development, construction management, benchmarking and energy usage monitoring, and green building design services for high performance new construction. AEA is a not-for-profit organization with offices in New York and California.</p>
	<p>Bright Power provides practical energy management and solar energy solutions that save building owners energy, money and time. We focus on multifamily residential buildings, enabling them to reduce waste, improve cash flow, achieve energy law compliance and make building occupants more comfortable. Clients include: building owners, management companies, developers, contractors, architects, governments and utility companies.</p>
	<p>Building Energy is developing a standard software platform for open building data and applications. BE designed its platform as a vendor neutral, open, and extensible system to serve as a catalyst for liberating building energy and asset data. BE is partnered with the U.S. DOE to co-develop and manage the Buildings Performance Database -- the largest energy and asset performance dataset in the U.S.</p>
	<p>Carbon Lighthouse makes it easy and profitable for commercial and industrial buildings to become carbon neutral. By collecting and analyzing roughly 1,000 times more data on-site than is typically employed in efficiency projects, Carbon Lighthouse engineers uncover deep savings opportunities even in already efficient buildings and quantify energy savings precisely and conservatively before project implementation begins. A focus on optimizing existing equipment enables 10% to 35% energy reductions without major retrofits or capital expenditures.</p>
	<p>Celtic Energy is an independent energy and sustainability consulting firm founded in 2000 to help facility owners maximize energy and cost reductions while realizing productivity gains through smarter, more efficient energy use. Services include a vast array of efficiency focused offerings including but not limited to comprehensive energy audits, Celtic Energy's core skills include industry-leading measurement and verification (M&V) and quality control expertise.</p>
	<p>Clean Fund specializes in property tax-based clean energy finance in order to bring property owners, energy service/equipment providers, mortgage lenders, and local governments together to realize projects that are profitable and green. Clean Fund to provide long-term, 100% financing that lets energy efficiency and renewable generation projects deliver compelling bottom line benefits from day one.</p>
	<p>HELIOS Building Efficiency is a Software as a Service (SaaS) platform to support the technical and financial underwriting of energy efficiency projects. Helios provides standardized energy analytics and risk assessment solutions to enhance investor confidence in the valuation of energy efficiency projects. One of the key innovations provided by Helios is an Energy Efficiency Risk Rating system that evaluates the performance risk of retrofit projects.</p>

	<p>Joule Assets delivers financing solutions backed by performance insurance guarantees for energy efficiency (EE) and demand response (DR) initiatives and projects, and we create Energy Reduction Assets (ERAs) through integrating simple financing and insurance options with untapped revenue streams. Leveraging our proprietary ERA software and unparalleled industry expertise, our mission is to expand commerce and reduce barriers in these complicated markets through creating transparency as well as connecting participants.</p>
	<p>LA Better Buildings Challenge is a public private partnership with a mission to reduce energy consumption 20% by 2020 across 30 million square feet of existing LA buildings. The LABBC offers a range of incentives and services to support participating properties in achieving this goal, from project development assistance, to rebate support and introduction of project financing options. The principles of the Investor Confidence Project are core to the LABBC, and form the basis for all of our project development and technical underwriting work.</p>
	<p>Metrus Energy provides capital, project development and asset management services for energy efficiency projects at large commercial, industrial and institutional facilities. Metrus offers comprehensive project financing solutions, including its innovative Efficiency Services Agreement (ESA), whereby customer repayment is based on a cost per avoided unit of realized energy savings.</p>
<p>MJM Energy Consulting</p>	<p>MJM Energy Consulting specializing at the intersection of clean energy and finance. Develop loan and leasing products for homeowners, commercial entities, non-profits and multi-family owners. Involved with public entities and private capital. Areas include PV, EE, geothermal and solar thermal. Firm is an advisor to NREL for its "Banking on Solar Initiative." and works with a range of i PACE capital providers and program administrators.</p>
	<p>Noesis Energy is a free, cloud-based energy management platform that lets end users analyze and track their energy performance, identify efficiency opportunities and predict and measure savings from efficiency projects. Free for end users, Noesis Energy sells premium reporting and data services as well as project tools for manufacturers, service providers and efficiency financing firms.</p>
	<p>NYCEEC is an independent, non-profit financial corporation established by New York City to assist the City in implementing its Greener, Greater Buildings Plan and to advance the goals of PlaNYC. NYCEEC's mission is to support the City's energy and climate action goals by catalyzing an energy efficiency retrofit financing market for private building owners. To achieve its mission, NYCEEC is partnering with banks, community development financial institutions and energy services companies to provide financing products for energy efficiency and clean heat improvements in buildings throughout the five boroughs of New York City.</p>
	<p>PACENow is an independent, non-profit advocate for Property Assessed Clean Energy, an innovative mechanism for financing energy efficiency upgrades to buildings. We promote and assist the development of PACE programs, work to foster best practices, guidelines and standards for PACE, and provide leadership for a growing universe of energy efficiency and PACE stakeholders.</p>

	<p>Performance Systems Development is passionately committed to building performance by improving the energy efficiency of buildings. Our training, software, services provide the tools, support, and knowledge needed to achieve peak building performance. These efforts yield energy efficient, safe, healthy, and comfortable spaces in which to work and live. Our clients span 47 states, and include energy efficiency programs, energy service providers and commercial building owners.</p>
	<p>Retroficiency enables utilities and large energy service providers to drive deeper building energy efficiency savings in less time and at a lower cost. Its Building Efficiency Intelligence platform rapidly develops energy models that deliver recommendations to help target buildings, engage customers, convert projects, and track opportunities more effectively and at scale. Retroficiency has evaluated more than 350 million square feet of building space to identify more than 1.5 billion kilowatt hours of annual savings since March 2011.</p>
	<p>SClenergy is an international energy management company headquartered in the USA. Dedicated to elevating building performance across owner portfolios, they are unique in combining high-tech software solutions and high-touch expertise, together with capital to deliver sustained savings. The nearly 100 SClenergy employees share a passion in helping customers lower their energy and operating expense, reduce their environmental impact, and enhance occupant satisfaction.</p>
	<p>Sustainable Real Estate Solutions is an industry leader in on-demand building energy performance assessment and proprietary benchmarking software, delivers Sustainable Real Estate Manager@a cloud-based software-as-a-service workflow platform enabling building stakeholders across the entire energy retrofit life cycle, from project development to recurring measurement and verification. Its Peer Building Benchmarking™ database contains over 125,000 buildings nationwide encompassing 20 property types comprising 3.3 billion square feet and over \$7.8 billion in annual energy costs and has reinvented public and commercial real estate's energy efficiency benchmarking best practice.</p>
	<p>Sustento Group is a leading provider of energy efficiency program design and delivery services, with deep expertise in the areas of project development and financing.</p>