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August 24, 2018

VIA HAND DELIVERY
Ms. Lora W. Johnson, CMC, LMMC
Clerk of Council
City Hall, Room 1E09
1300 Perdido Street
New Orleans, Louisiana 70112

> **RE:** **Rulemaking Docket to Amend the Council's Customer Service Regulations (R-18-225) CNO Docket No. UD-18-04**

Dear Ms. Johnson:

Enclosed for your further handling please find an original and three copies of Entergy New Orleans, LLC's ("ENO") Comments regarding Whole Building Aggregated Data Pursuant to R-18-225, in connection with the above-referenced matter. Please file an original and two copies into the record, and return a date-stamped copy to our courier.

Should you have any questions, please do not hesitate to contact me. Thanking you in advance for your usual courtesy and assistance with this matter.

Sincerely,

Gary E. Huntley

Enclosure
cc: Council Utilities Regulatory Office
        Official Service List, Council Docket UD-18-04

EX PARTE: IN RE: A RULEMAKING TO	)	
AMEND THE COUNCIL'S CUSTOMER	)	
SERVICE REGULATIONS	)	**DOCKET NO. UD-18-04**
	)	

ENTERGY NEW ORLEANS LLC'S COMMENTS
REGARDING WHOLE BUILDING AGGREGATED DATA

Pursuant to Resolution R-18-225, Entergy New Orleans, LLC ("ENO" or the "Company") respectfully submits these comments regarding a recent proposal to amend the Council for the City of New Orleans's ("Council") Customer Service Regulations ("Regulations") to define the parameters through which ENO could disclose aggregated, whole building energy usage data for buildings with four or more meters to the owners of such buildings, subject to reasonable confidentiality restrictions. The Council, through Resolution R-18-225, specifically requested that ENO provide comments related to the logistics and costs associated with (1) mapping meters to specific buildings, and (2) automating aggregated data and transmitting it to customers. The Company responds as follows:

I.   Mapping Energy Meters to Buildings

In *Best Practices for Providing Whole-Building Energy Data: A Guide for Utilities* ("Best Practices Manual"), the U.S. Department of Energy "provides best practices for utilities to provide building owners with access to whole-building energy data to enable energy benchmarking."[1] One of the challenges discussed in the Best Practices Manual is the difficulty in identifying the meters that are associated with each building. ENO's customer billing systems,

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[1]   *Best Practices for Providing Whole-Building Energy Data: A Guide for Utilities,* United States Department of Energy, January 2016

similar to those of many other utilities, generally are not designed to track energy consumption of a specific building given that separately-metered accounts are generally under separate customer names.

As the Council has stated in Resolution R-18-225,[2] "ENO is about to undertake a roll out of Advanced Metering Infrastructure ("AMI")." Further, the Council expressed interest in "whether this process [AMI rollout] will offer any potential opportunities to efficiently identify the specific location of meters on ENO's system, or facilitate the provision of aggregated whole-building data in any way." ENO has consulted with its AMI deployment team and vendors, and has learned that AMI technology will in fact enable the ability to accurately map meters to specific geographic locations using a geographic information system ("GIS").

AMI deployment is currently scheduled to begin in early 2019, but ENO will not have the ability to use the GIS system to locate its meters until full AMI deployment has taken place (end of 2020, at the latest). ENO believes that using the GIS system in combination with some form of building owner verification would meet the objective of enabling ENO to understand the specific meters that are attached to each building. Depending on the volume of requests, however, sending ENO trucks to verify the meter numbers can become costly, so using an owner-verification method whereby building owners would confirm the meter numbers on their building is recommended. Of course, building owners should be required to provide verification that they in fact own the building at issue; but in summary, because this functionality is already built into ENO's current AMI infrastructure, this method would result in negligible costs to customers.

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[2]   See Resolution R-18-225, at 6.

Prior to enabling this functionality being enabled through AMI, which was contemplated in Resolution R-18-225, there providing data would be difficult and, comparatively speaking, potentially costly. In other words, before AMI deployment, the Company would need to employ a costly, time-consuming manual process that involves either paying a contractor to "map" the entire ENO system, or identifying meter numbers attached to each transformer, then having its personnel verify the meters to confirm the meter numbers. After verifying the meter numbers, ENO personnel would have to manually aggregate the meters' usage and transmit the data to the building owner or to a benchmarking tool.

Depending on the number of requests, these processes could become costly. As an alternative to manual aggregation, ENO can build a tool that aggregates and transmits the data directly from its billing system for approximately $450,000, but this tool would take time to design and develop. Moreover, given that AMI will have the ability to determine the location of meters and aggregate data for no incremental costs; it stands to reason that any incremental costs for this functionality before AMI deployment would not benefit customers.

II.   **Aggregating and Transmitting Energy Usage Data to Building Owners**

Once the meters are verified, the process of aggregating and transmitting the energy usage data to the building owner can be achieved in several ways: (1) manual aggregation, (2) building a tool to connect with the current billing system, (2) utilizing the Customer Engagement Portal ("CEP") or (3) retaining a third party to provide a turnkey solution.

As previously discussed in Section I of this document, the first two options, manually aggregating and transmitting the energy usage data and building a tool to connect with the current billing system would not be effective methods of providing the aggregated data given the currently planned AMI rollout.

The third option would utilize ENO's plans to have the capability to aggregate data through the AMI CEP by building internal software that automatically aggregates the data by creating a "virtual meter" that aggregates all meters in the building. Once the meters are verified, a utility employee enters the meter numbers into the system to create the virtual meter. Other utilities, including Xcel Energy, have utilized this method. With the deployment of AMI, ENO will have the ability to build and implement a similar solution that aggregates and transmits the energy usage data to both the owner, through the CEP, and to a benchmarking service.

Providing the data through a benchmarking, makes the process becomes less cumbersome and time-consuming for building owners who would like to participate in a benchmarking program. The Department of Energy ("DOE") offers free benchmarking software, Portfolio Manager, which other utilities currently utilize, including Commonwealth Edison, Pepco, and Puget Sound Energy. The estimated cost associated with creating this type of software will likely be under $25,000 before accounting for the labor related to any manual processes that would need to be performed. ENO estimates that this software can be developed and implemented in 2019 before full AMI deployment.

Finally, as an alternative to the aforementioned options, a third party company could provide a turnkey benchmarking program. These programs handle the benchmarking process from aggregation to transmission. For example, Accelerated Innovations, ENO's current Behavioral Program implementer, developed the MyMeter platform to handle all aspects of data aggregation and transmission. These programs typically come at a premium, but can offer additional options to building owners. The costs associated with third party benchmarking solutions can range from $20,000 to $40,000 for start-up costs and $40,000-$75,000 annually,

depending on the level of functionality and options provided. The timeline for a third party to link design, build and integrate a solution can take up to a year.

III. Other Considerations

In addition to the two factors discussed above, the Company also appreciates the opportunity to briefly address other potential issues associated with the aggregation of whole building data: (1) the meter threshold should be tied to active meters; (2) consent should be required from all tenants if one tenant's usage is over 50%; and (3) the Council should consider restrictions on the building owner's use of the data.

First, Resolution R-18-225 contemplates the threshold for providing aggregated whole building data being set at four or more meters. In other words, owners of buildings with four or more meters would be eligible to receive aggregated building energy usage data without consent of each individual tenant. It should be noted, however, that if some of these meters are connected to rooms or areas that do not have active tenants (*i.e.*, a building has four meters, but only one active tenant), then the aggregated data will essentially be the usage of the one active tenant. Therefore, ENO suggests that the four meter threshold should be tied to active meters/tenants. The owner is best situated, and should be required, to notify the utility if the number of active tenants/meters drops below the selected aggregation threshold or if ownership of the building is transferred in some manner.

Another concern is that if a multi-tenant building has one tenant that uses the vast majority of the building's electricity, it is easier to disaggregate the data. Some utilities have addressed this problem by requiring consent from all tenants if one individual tenant accounts for more than 50% of the usage. This type of requirement would provide an additional measure of security to protect individual tenants' data.

It should also be noted that restrictions on the building owner's use[3] of the data can and should be determined by the Council, then effectuated through "Terms of Use" provisions. The Council should place reasonable limitations on the building owner's use of such aggregated data (*i.e.*, limited to energy efficiency measures). For example, the City of St. Louis Department of Public Safety includes the following provision on its Utility Account Release Form:

> …Such data will be used only for purposes of complying with the City of St. Louis's energy benchmarking and transparency ordinance and undertaking energy efficiency and energy management projects.

IV.   Conclusion

Again, the Company appreciates this opportunity to supply comments, as directed by Resolution R-18-225. As contemplated by the Council in Resolution R-18-225, AMI will play a substantial role in enabling this functionality with almost no incremental costs to customers. The Council should also consider the additional concerns raised herein. The Company looks forward to working with the Council, its Advisors, and all intervenors going forward in this rulemaking.

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[3]   It should be noted that these comments are specifically limited the provision of aggregated customer data to building owners and their use of such data, and do not address the distribution or use of such data by ENO in other instances.