

ALLIANCE for SUSTAINABLE COLORADO

Celebrating 10 years of Advancing Sustainability

June 11, 2014

Colorado Public Utilities Commission
1560 Broadway #250
Denver, CO 80202

RE: 14R-0394EG "Data Access and Privacy"

To Whom It May Concern:

The Alliance for Sustainable Colorado offers this letter of support for comments filed by the City and County of Denver for docket 14R-0394EG.

The Alliance Center, located at 1536 Wynkoop Street, has been owned and operated by the Alliance for Sustainable Colorado since 2004. The building has earned numerous awards, including an ENERGY STAR Leader score of 85. It is the first historic building in the world to earn two LEED certifications: Gold for Existing Buildings and Silver for Commercial Interiors. We are currently in the process of pursuing LEED platinum for Existing Buildings Operations & Maintenance (EBOM).

Monitoring and benchmarking energy use is a key component of managing our asset. Benchmarking a building with Portfolio Manager is the first step in gaining general insight into energy performance and tracking performance over time. Even when whole energy data is available to an owner, manually entering that data into Portfolio Manager is inefficient and a step that many owners simply do not have time to take. Energy data should be automatically uploaded into Portfolio Manager by the utility so that all owners have this basic level of performance information about their building. If utilities provided the option to automatically upload whole building aggregate data to Portfolio Manager it would provide several benefits including:

- increase the accuracy of data input into Portfolio Manager
- eliminate the risk of false data/fraud
- reduce operating expense by automating a task currently paid for in labor costs

Green Button does not "speak" to Portfolio Manager, so utility adoption of Green Button Connect My Data does not automate the process of manually entering data into Portfolio Manager. We encourage utility adoption of national best practices regarding automatic upload of data into Portfolio Manager.

Thank you for the opportunity to comment on this critically important matter.

Sincerely,



Anna Zawisza
Executive Director

Alliance for Sustainable Colorado

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RE: 14R-0394EG "Data Access and Privacy"

Dear Director Dean and Commissioners:

Denver 2030 District respectfully offers these comments regarding aggregation standards and the privacy consent process in docket 14R-0394EG. Denver 2030 District is a community of more than 30 high-performance buildings in Downtown Denver, the hub of the Rocky Mountain region.

Owners and tenants seeking to increase energy efficiency and sustainability in Colorado's biggest buildings have a keen interest in the outcome of this docket. In order to manage their assets and reduce energy use, they first need to understand the aggregate energy usage of their buildings and be able to easily upload that data into the industry-standard benchmarking tool, ENERGY STAR Portfolio Manager. If Colorado's data access rules stay as they are, benchmarking buildings to increase energy efficiency will continue to be difficult. The "15/15" standard means many building owners have to use the cumbersome, confusing, and risk-inflating consent form to gain authorization to data about how their buildings are performing.

The Commission can change this process to support benchmarking.

First, the Commission should recognize the building owner's native economic interest in understanding the energy usage of their buildings. We understand the privacy concerns that led to the current process, but we are not a general third-party trying to research tenants or sell a product or service. Rather, we are simply trying to manage a valuable asset and reduce operating costs. We urge the Commission to tailor a rule for building owners, easing or eliminating the "15/15" standard when a verified building owner requests whole building energy usage data. If the Commission decides to ease the aggregation standard for building owners, we are willing to work with Parties and the Commission to develop "Terms of Use" for whole building energy usage data. After all, we routinely handle confidential tenant information with care.

Second, if the Commission decides to retain an aggregation standard, the process for gaining tenant consent for buildings with few tenants should be much easier. The consent form should be no more than 2 pages and should not inflate the risks of granting consent to the building owner to access whole building data.

Lastly, even when whole energy data is available to an owner, manually entering that data into ENERGY STAR portfolio manager is inefficient and costly. Benchmarking a building with portfolio manager is the first step in gaining general insight into energy performance and tracking performance over time. Energy data should be automatically uploaded into portfolio manager by the utility so that all owners have this basic level of performance information about their building.



Thank you for the opportunity to comment on this exceedingly important matter.

Sincerely,

Denver 2030 District Board of Directors



Brett Phillips, LEED AP O+M
Director of Sustainability
7887 E. BELLEVIEW AVE, STE. 330
DENVER, COLORADO 80111

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Colorado Public Utilities Commission
1560 Broadway #250
Denver, CO 80202

RE: 14R-0394EG "Data Access and Privacy"

Dear Director Dean and Commissioners:

Unico Properties LLC respectfully offers these comments regarding aggregation standards and the privacy consent process in docket 14R-0394EG. At Unico, we understand that buildings leave lasting legacies on our communities. That's why we design, develop, and operate our buildings with strategies that support both environmental values while maximizing asset value for our partners and investors. All of Unico's office properties are tracking energy usage and as a result 17 Class-A office properties have earned ENERGY STAR® awards for their energy leadership and efficiencies.

Within our portfolio, there are properties that range from an historical early 1900s-era building to a Class-A, 42-story office tower built only a few years ago. But regardless of age, we have seen significant energy reduction through the benchmarking process and ensuing building upgrades. Some have shown surprisingly significant improvement with small changes.

In order to manage our assets and reduce energy use, we first need to understand the aggregate energy usage of our buildings and be able to easily upload that data into the industry-standard benchmarking tool, ENERGY STAR® Portfolio Manager. Under the current rules, accessing whole building aggregate data from the utility can be extremely cumbersome and once the data is finally acquired we must manually enter the data into Portfolio Manager for each individual building. Energy data should be automatically uploaded into Portfolio Manager by the utility so that all owners have this basic level of performance information about their building.

Building owners also have a native economic interest in understanding the energy usage of our buildings. We urge the Commission to tailor a rule for building owners, easing or eliminating the "15/15" standard when a verified building owner requests whole building energy usage data. If the Commission decides to ease the aggregation standard for building owners, we are willing to work with Parties and the Commission to develop "Terms of Use" for whole building energy usage data. After all, we routinely handle confidential tenant information with care.

And finally, if the Commission decides to retain an aggregation standard, the process for gaining tenant consent for buildings with few tenants should be much easier. The consent form should be no more than two pages and should not inflate the risks of granting consent to the building owner to access whole building data.

Thank you for the opportunity to comment on this exceedingly important matter.

Sincerely,

A handwritten signature in black ink that reads "Brett Phillips".

Brett Phillips



U.S. GREEN BUILDING COUNCIL – COLORADO

The Green Building Community

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RE: 14R-0394EG “Data Access and Privacy”

Dear Director Dean and Commissioners:

U.S. Green Building Council Colorado Chapter works with many of the leading building owners and operators in Colorado, and they consistently highlight the difficulty of collecting aggregated whole building energy data as a large barrier to achieving better efficiency throughout their portfolios. Access to building energy data enables benchmarking building energy performance, calculating the potential energy savings of energy improvement measures, and measuring and verifying those energy savings. However, getting access to building energy consumption data is often extremely time consuming if the building is submetered and has less than 15 tenants.

USGBC Colorado supports benchmarking of energy use in buildings, and recommends revisions to the proposed Data Access and Privacy rules to make it easier for building owners to benchmark their buildings. We only support solutions that do not cause undue financial burden on utilities that could result in ratepayer increases.

One such solution would be to tailor a rule for building owners, easing or eliminating the “15/15” standard when a verified building owner requests whole building energy usage data. If the Commission decides to keep the aggregation standard for building owners, we request defining primary and secondary purposes for data access and designating benchmarking as a primary purpose.

Thank you for the opportunity to provide comments on the proposed rule revisions.

Sincerely,

Sharon Alton

Sharon Alton
Executive Director
U.S. Green Building Council Colorado Chapter