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May 2, 2016

Georgia Public Service Commissioners  
244 Washington St SW  
Atlanta, GA 30334



225 W Santa Clare St Suite 1050  
San Jose, CA 95113

Re: Real Estate Industry's Need for Improved Whole-Building Energy Data for Multi-Metered Buildings

Dear Esteemed Georgia Public Service Commissioners,

As leaders in the real estate community, we are collectively requesting improved access to whole-building energy data<sup>1</sup> in Georgia. As customers representing substantial square footage across the state, we have a particular interest in ensuring that we obtain whole building energy data to better manage our building portfolios. This information is a transformative tool that improves the quality of our capital decisions, increases our access to investor funding, and saves money for building owners and occupants. Whole building energy data also allows us to benchmark our buildings and understand how they perform against the competition, a true market-driver for improving performance and management.

We are aware of Georgia Power's EnergyDirect platform that building owners can use to access monthly, daily, hourly, and interval data per meter, with the monthly costs increasing for the more granular data. This tool will work well if the building is master metered. However, for a building with multiple meters, the platform is not easy to use, nor cost-effective. For example, a building owner would have to pay a minimum of \$15,000 a year to obtain whole-building data through the existing system if that commercial building had 50 separately metered tenants. Taking the next step to benchmark that building requires downloading and formatting the data from the EnergyDirect platform and inputting the values into a benchmarking tool, which adds time and the potential for human errors to the process.

To effectively 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. To benchmark a building, any building owner needs 12 consecutive months of whole-building energy use data. This information – absent utility action – is difficult for building owners to retrieve. The building owner does not seek personally-identifiable information, but rather total energy use data for the entire building. Therefore whole-building data is incredibly valuable to property managers and building owners. We must keep up with the demands of the market and this information is critical to our business and our customers as a part of our efforts to run the most efficient, and therefore most valuable, buildings in Georgia.

Leading utilities all across the country provide whole-building data to our building owners at minimal cost and without third party authorization so long as it meets a predetermined aggregation threshold set by the utility. For instance, in Chicago, Exelon's ComEd provides whole-building data via their [Energy Usage Data System](#) when there are at least four utility accounts to aggregate within the building. In addition to ComEd, more than twenty other utility whole-building data programs exist, including Pacificorp's [Rocky Mountain Power](#) in Salt Lake City,

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<sup>1</sup> Whole-building, aggregated data: total energy consumption data for an entire building obtained by summing up the energy usage data measured by tenant meters.

[Puget Sound Energy](#) in Seattle, Xcel Energy in Colorado and Minnesota, and Con Edison in New York City. These utilities offer this data to building owners who request it, in a convenient electronic form, and it is a relatively low cost program delivering outsized benefits to the market. These efforts have received the support of the National Association of Regulatory Utility Commissioners, the National Association of Utility Consumer Advocates, and the National Association of State Energy Offices, among others.

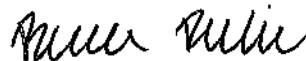
We urge the Commission to direct Georgia Power to join the ranks of leading utilities providing this service, making whole-building data available in an easy-to-use and affordable manner to allow our businesses to work more efficiently. As it currently stands, we simply cannot effectively track and manage electricity consumption at our multiple-metered buildings without incurring great expense that other utilities have avoided charging us to date.

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

Sincerely,



David R Furer  
Jamestown Director of Engineering



Becca T. Rushin  
Jamestown Vice President, Sustainability & CSR



David Pogue  
CBRE Global Director of Corporate Responsibility