



Mayor of Providence

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Jorge O. Elorza

February 7, 2022

To the Division of Public Utilities and Carriers:

I respectfully submit my concerns regarding the transfer of National Grid's gas and electric businesses to Pennsylvania Power and Light (PPL) as a concerned elected official, community member, resident, and parent.

The City of Providence is a longstanding supporter of energy benchmarking as a powerful strategy that can help building owners understand their energy costs, and identify opportunities to reduce energy use, improve building performance, and reduce carbon emissions. The City has benchmarked its municipal buildings for over ten years, and published Annual Energy Reports highlighting its achievements. The City also launched RepowerPVD, its voluntary energy challenge program, designed to help large buildings in the City conserve energy, save money, and gain recognition for their leadership and contributions to Mayor Elorza's goal to make Providence carbon neutral by 2050. One tool that has been critical in the City's work with participant building owners through the RePowerPVD Challenge is aggregated utility data. Provision of aggregated data is an essential component for the City's work to achieve its climate goals.

National Grid provides access by property owners to aggregated, anonymized utility data that summarizes the energy consumption of the entire building, including all tenants. This access enables property owners to more easily compile their building's energy data and leverage it to identify opportunities to make improvements. Aggregated data also enables property owners to report their data for the RePowerPVD energy challenge. National Grid provided a letter to the City of Providence during consideration of a proposed Building Energy Reporting Ordinance (BERO) in January 2021 where it summarized this service:

- "National Grid supports the use of U.S. EPA's ENERGY STAR Portfolio Manager tool for Rhode Island properties as part of a larger effort to promote energy efficiency and identify improvement opportunities for our customers. Portfolio Manager provides benchmarks to help customers assess the energy performance of their building(s) and encourage action to make the building(s) more efficient. National Grid has developed a path for automated data uploads into Portfolio Manager. Customers can authorize National Grid to automatically upload aggregate, whole building energy usage data, both electric and gas, onto Portfolio Manager."

National organizations have long supported access to aggregated data as a critical tool for benchmarking. The National Association of Regulatory Utility Commissioners (NARUC) issued a Resolution on Access to Whole-Building Energy Data and Automated Benchmarking in 2011 urged Public Utility Commissions to take “all reasonable measures to facilitate convenient, electronic access to utility energy usage data for building owners, including aggregated building data that does not reveal customer-specific data to protect individual customer privacy, as well as the sharing of customer-specific data to the extent provided for under State law and regulations.” The National Association of State Utility Consumer Advocates (NASUCA) issued a 2013 NASUCA resolution urging “all reasonable measures to facilitate electronic access to utility energy usage data for building owners.”

With the potential sale of Narragansett Electric, it is unclear whether Rhode Island customers will continue to be provided access to aggregated data should a sale be approved. The City urges the Rhode Island Public Utilities Commission to make the provision of aggregated whole building data a condition of the sale and a requirement in the Integrated Resource Plan going forward. Upon approval of the sale, PPL may be unable to replicate the automated upload of aggregated data to Portfolio Manager immediately, and if so it would be acceptable to the City for PPL to provide customers access to that data via spreadsheet. However, the Environmental Protection Agency hosts a toolkit on its website that provides guidance to help utilities provide aggregate data to their customers.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'J. Elorza', with a stylized flourish at the end.

Jorge O Elorza  
Mayor