



0000158663



Building Owners and  
Managers Association  
of Greater Phoenix

Docket RU-00000A-14-0014

RECEIVED

December 10, 2014

2014 DEC 12 P 12: 15

Arizona Corporation Commission

Mr. Bob Stump, Chairman  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

AZ CORP COMMISSION  
DOCKET CONTROL

DOCKETED

DEC 12 2014

Subject: Aggregated whole building data

DOCKETED BY

Dear Mr. Chairman,

It has come to our attention that the Commission will be meeting on Friday, December 12, to discuss a variety of issues including privacy concerns as they relate to whole building data aggregation. On behalf of the Building Owners and Managers Association of Greater Phoenix (BOMA/Phoenix) and BOMA International, we respectfully request that you take into consideration the needs of building owners to have access to complete and reliable data to benchmark energy consumption and to understand and prioritize energy efficiency retrofit opportunities.

BOMA represents more than 19,000 individuals who own or manage over 9 billion square feet of commercial office space in North America. Our local BOMA association, BOMA/Phoenix, is one of the 92 local associations that constitute BOMA International, and represents more than 300 members and almost 70 million square feet of commercial real estate in the Greater Phoenix area.

BOMA believes that utilities should provide whole building energy consumption data (units of usage) to building owners and managers. Ideally, utilities should utilize EPA ENERGY STAR automated benchmarking services that allow them to upload energy consumption data directly into the ENERGY STAR Portfolio Manager benchmarking tool. The inability of commercial building owners to access whole-building energy data, including energy consumption data in separately metered tenant spaces, restricts the capacity of both building owners and tenants to make informed decisions to drive energy efficiency improvements. Whole building aggregate data provides vital information to the building owner while protecting the privacy concerns of tenants.

In the Proposed Rules (Proposed R14-2-2215), a blanket requirement would be imposed that utility usage information must have a minimum of fifteen (15) separate accounts in order to be delivered to any and all third parties. While we understand the need to protect the privacy of building tenants, we believe that this proposal would create an unreasonable barrier for building owners. Building owners have a legitimate need to have access to their building data to better understand their utility usage and make informed decisions to improve building efficiency. BOMA believes that building owners should be able to obtain whole-building usage summaries so long as the summary aggregates at least three (3) customers, which

Federated with BOMA International

ORIGINAL

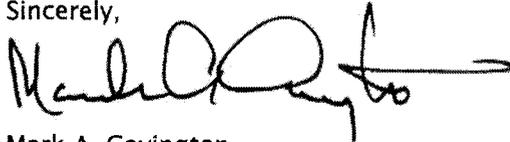
is consistent with several other states' practices. This approach would fully protect customer privacy interests, would enable the building owners to realize substantial private benefits by engaging in better energy management, and would also help the utilities to customize programs to better meet the needs of their customers.

BOMA has a long history as an energy efficiency advocate. BOMA has actively promoted benchmarking through EPA's ENERGY STAR Portfolio Manager as the key first step to understanding a building's energy use and providing the necessary data to monitor performance, measure improvements, and implement cost-effective improvements in buildings. However, many building owners lack access to energy consumption data for separately metered tenant spaces in their buildings and, since the tenant - not the building owner - owns the data, most utilities will only provide tenant energy consumption data to the owner/manager with the permission of the tenant. In a large building with many separately metered tenants, it just isn't practical to obtain potentially hundreds of signatures. However, if the Commission proceeds with the requirement of a minimum of fifteen separate accounts, many smaller buildings, or buildings with fewer than fifteen accounts or separate meters, would similarly be unable to access their energy consumption data.

As the Commission works to resolve these important issues, we encourage you to fully consider the benefits of building data to drive energy efficiency. We also respectfully request that you not rush to complete action on this rulemaking to the potential detriment of the built environment.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark A. Covington", with a long horizontal stroke extending to the right.

Mark A. Covington  
Executive Director  
For the Board of Directors

cc: Brenda Burns, Commissioner  
Susan Bitter Smith, Commissioner  
Bob Burns, Commissioner  
Gary Pierce, Commissioner