November 13, 2015

Public Service Commission
Attn: Gary Widerburg
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84111

Docket Number: 15-057-16
In the Matter of: the Application of Questar Gas Company for Approval of the 2016 Year Budget for
Energy Efficiency Programs and Market Transformation Initiative

Dear Commissioners,

In its Energy Efficiency Application for the year 2016, Questar Gas proposes to include $25,000 in
funding to develop an "automated natural gas usage data upload system" as part of their 2016 ThermWise
natural gas efficiency program.[1]

The organizations and businesses listed below strongly support Questar's proposal to develop an
automated data upload system and encourage the Commission to approve this proposal. Below we
provide some background information and additional recommendations for Questar to consider if this
proposal is approved by the Commission.

We appreciate Questar's involvement in the U.S Department of Energy's Energy Data Accelerator
initiative. This initiative provides technical support to partners to "make it easier for building owners to
get access to whole-building energy usage data for the purposes of benchmarking their buildings."[2]

Building energy benchmarking is a critical first step for successful energy management in commercial
buildings. In order to manage energy and reduce energy use, building owners and facility managers first
need to understand the aggregate energy usage of their building(s) and be able to easily upload that data
into the industry-standard benchmarking tool, Energy Star Portfolio Manager. Energy Star Portfolio
Manager is the free, online energy benchmarking software tool developed by the United States
Environmental Protection Agency's Energy Star program.[3] Buildings that consistently benchmark their
energy performance save energy. According to the Energy Star program, during 2008-2011 a group of
35,000 buildings that consistently benchmark their energy performance saved an average of 2.4 percent
per year, for a total of 7 percent over the three years.[4]

To benchmark a building, a building owner needs 12 consecutive months of whole-building energy use
data. Without an automated data upload system, this information is difficult for building owners to
retrieve and time-consuming to manually input into Portfolio Manager. Through Questar's proposed
system, building energy benchmarking can become a much simpler automated process, with energy
consumption information being automatically uploaded into building owner's Portfolio Manager account
on a monthly basis.

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[1] Questar Gas Energy Efficiency Application, paragraph number 35, pages 15-16.
[2] United States Department of Energy Data Accelerator
http://www1.eere.energy.gov/buildings/betterbuildings/accelerators/energy.html
[3] Energy Star Learn about benchmarking: http://www.energystar.gov/buildings/about-us/how-can-we-help-you/benchmark-energy-use/benchmarking
[4] Energy Star Portfolio Manager Data Trends, Benchmarking and Energy Savings factsheet:
http://www.energystar.gov/sites/default/files/buildings/tools/DataTrends_Savings_20121002.pdf

We have the following recommendations for the Commission and Questar Gas to consider if this proposal is approved:

- We recommend that the system developed be designed to facilitate automated data uploads to their customers' accounts in the Energy Star Portfolio Manager program specifically, given that Portfolio Manager is the most commonly used, free, industry-standard benchmarking tool available.
- If approved, we strongly encourage Questar Gas to work with the same vendor that recently developed the automated benchmarking platform for Rocky Mountain Power, with the goal of creating a single online portal through which commercial utility customers can access both electricity and natural gas data in a uniform and coordinated manner. Creating a coordinated "one-stop-shop" system to access both electricity and natural gas data will foster greater participation in whole building energy benchmarking, and also promote investments in commercial energy efficiency projects. In addition, leveraging the expertise of a third-party vendor in the development of this data upload system has been found to be significantly more cost-effective than creating internal programs.[5]
- We strongly encourage Questar Gas to expedite the development of this program, if approved by the Commission, given that Rocky Mountain Power's energy benchmarking program is now live and numerous commercial customers are eager to enroll in this automated service.[6]
- While this proposed program, if approved, would be funded through the ThermWise program budget, and may therefore be limited to Questar commercial customers on the GS rate schedule, we encourage Questar to identify opportunities for customers on the TS rate schedule to participate in the program as well.

Again, the organizations and businesses listed below strongly support Questar's proposal to develop an automated data upload system and encourage the Commission to approve this proposal.

Thank you for considering these comments on this important matter. If you have questions, please contact Kevin Emerson: (801) 608-0850 or kevin@utahcleanenergy.org.

Sincerely,

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Shelli L. Menegos, RPA, FMA
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Building Owners and Managers Association (BOMA) Utah

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[5] Personal communication between Kevin Emerson, Utah Clean Energy and Chris Clark, Rocky Mountain Power/PacifiCorp.
[6] Rocky Mountain Power *Energy Benchmarking* webpage: https://www.rockymountainpower.net/benchmarking