

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to  
Investigate and Design Clean Energy  
Financing Options for Electricity and  
Natural Gas Customers.

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Rulemaking R 20-08-022  
Filed August 27, 2020

**REPLY COMMENTS OF K. DIXON WRIGHT ON THE ORDER  
INSTITUTING RULEMAKING TO INVESTIGATE AND DESIGN CLEAN  
ENERGY FINANCING OPTIONS FOR ELECTRICITY AND NATURAL GAS  
CUSTOMERS.**

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Orange Button Collaboration Group Recommendations for  
Order Instituting Rulemaking to Investigate and Design Clean Energy Financing Options  
for Electricity and Natural Gas Customers.  
RULEMAKING 20-08-022

### Orange Button Collaboration Group Statement

Building the Smart Grid better, faster, cheaper requires unleashing the power of standardized data. The transition to digital communications, smart contracts and electronic transactions will enable data analytics and next generation products and services. Federal and State agencies, Capital and Financial Markets and the Construction industry should implement standardized frameworks that support ecosystem data interoperability based on machine-readable data standards for common data exchange.

### Overview

As CPUC explores financing options for energy projects it should consider aligning with federal efforts like the [NIST Framework and Roadmap for Smart Grid Interoperability Standards](#) and [DOE XBRL Orange Button](#) taxonomy which established data interoperability between utilities, finance, insurance and surety markets with the construction industry tailored for energy related projects.

The objective of these initiatives are to leverage standardized data to improve administration, reduce costs throughout the ecosystem and increase risk management capabilities on energy projects by streamlining data exchange for underwriting and enabling data analytics on both a project and portfolio level.

This would have a direct impact on programs like On Bill Repayment, where third party lenders could utilize financial products like insurance and utility payment surety bonds to offer competitive financing, including green bond funds and possibly tax equity. Utilities as administrators of the loan already accept utility payment surety bonds, which removes the utility from any financial exposure, and the third-party lender benefits from the surety payment guarantee to support low cost financing.

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For a detailed report the [Orange Button collaboration group responded to a 2019 RFI by PG&E](#) detailing the *Public Benefit* and how data interoperability enables *Commercial Interests* to innovate new products and services. On Bill Repayment was the model to demonstrate how data interoperability could impact the ecosystem to provide consumers with better financing options.

How a lender or surety transitions to digital for underwriting and what they charge for their respective financial products and services does not involve the utility and regulated under banking and insurance. It does, however, provide more financing options for the consumer at no risk to the utility or ratepayer.

Most utilities are public and therefore already utilizing the XBRL standard, FREC is adopting XBRL for reporting, and use of the XBRL standard is free for all stakeholders and their respective systems.

Aligning the California Grid with Federal Smart Grid Interoperability Standards that include Orange Button will enable all stakeholders in the ecosystem to innovate and modernize their respective applications confident in the ability to securely and reliably exchange data.

Unleashing the power of data provides a simple and cost-effective way to bring capital markets to both residential and commercial consumers with competitive financing to every utility customer.

### Summary

Our recommendation is for CPUC to authorize utilities to offer On Bill Repayment for clean energy projects up to \$5,000,000 as outlined in the CHEEF flyer data January 31, 2020, leaving it to third party lenders to administer their underwriting and risk management independent from utility or ratepayer support.

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CPUC should encourage, but not require, utilities to consider aligning their data standards to follow the NIST federal roadmap and framework with adoption of the DOE XBRL Orange Button data standard to promote industry engagement and innovation that provide better products and services to consumers.