

# CBS Corporate Environmental Health, Safety & Sustainability

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## UTILITY BILL COLLECTION

The utility bill data collection process using Urjanet discussed in the March EHS&S Newsletter, was piloted at New York and LA locations in February with great success. Since then, we have been gradually rolling the program out to additional locations and have captured data for approximately 119 separate utility bills from ConEd, LADWP, SoCal Gas, Constellation Energy, Direct Energy, PG&E, ComEd, Florida Power and Light and Duke Energy. At last count, 23 locations are at least partially enrolled. There have been no reports of disturbances in billing.

In the coming weeks, we will expand the scope to include all eligible locations. If your location is not already enrolled, we will be in touch to request your login information if you have electronic access to your utility provider and your Tax ID number if you do not. While a few locations are not eligible for the program either because they receive their bills from a landlord or because their utility provider does not participate, the system is available for most locations. Those locations that are not eligible for electronic data capture will be transitioned to manually uploading their bills monthly into the EHS reporting platform.

The Urjanet process will aid us in accomplishing three important objectives: data completeness, data quality and efficiency. It is important to have an accurate, real-time picture of our energy usage in order to implement and support effective energy reduction projects. This process will improve the accuracy of data, which is especially important when EnerNOC's UBM rolls into our EHS&S reporting platform for enterprise-wide energy use calculations. Finally, the new process will end the time-consuming system currently employed whereby bills are scanned and sent to EHS&S for uploading into the EnerNOC system.

If you would like more information about the EnerNOC UBM or the bill collection process, please contact Katy Rullo, [Kathleen.rullo@cbs.com](mailto:Kathleen.rullo@cbs.com).

## USING GENERATORS IN DEMAND RESPONSE

With summer nearing and demand response requests more likely, it's a good idea to become re-acquainted with the RICE rule (40 CFR Part 60) if your generators are in a demand response agreement.

Changes to the Clean Air Act vacated provisions that allowed operators of stationary reciprocating internal combustion engine (RICE) backup generators to participate in demand response programs up to 100 hours per year without meeting stringent Clean Air Act emissions requirements. Simply put, diesel backup generators used in demand response are required to meet stringent emission standards.

It's important to ensure that any generators you plan to use in demand response comply with the regulations. The RICE rule defines, "existing emergency engine" based on the engine manufacture date, fuel type, and size. The standards can be complicated but are necessary to understand because violations of the Clean Air Act are subject to potentially large fines, shut downs, and/or criminal enforcement actions. If you would like assistance in determining whether your backup generators meet the new standard, please contact David Templeman, [david.templeman@cbs.com](mailto:david.templeman@cbs.com).