

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013 (Filed August 14, 2014)
And Related Matters	Application 15-07-002 Application 15-07-003 Application 15-07-006 (Filed July 1, 2015)
(NOT CONSOLIDATED)	
In the Matter of the Application of PacificCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005 (Filed July 1, 2015)
And Related Matters	Application 15-07-007 Application 15-07-008

RESPONSE OF THE CLEAN COALITION TO MOTIONS OF PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY, AND SAN DIEGO GAS AND ELECTRIC COMPANY FOR CONFIDENTIAL TREATMENT REDACTION OF DISTRIBUTION SYSTEM PLANNING DATA

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INTRODUCTION

Pursuant to the June 8, 2018 ruling of the Administrative Law Judge Mason in this proceeding,¹ the Clean Coalition respectfully submits this response to the motions of Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and San Diego Gas and Electric Company (“SDG&E”), for Confidential Treatment and Redaction of Distribution System Planning Data.

The Clean Coalition is a nonprofit organization whose mission is to accelerate the transition to renewable energy and a modern grid through technical, policy, and project development expertise. The Clean Coalition drives policy innovation to remove barriers to procurement and interconnection of distributed energy resources (“DER”) – such as local renewables, advanced inverters, demand response, and energy storage – and establish market mechanisms that realize the full potential of integrating these solutions.

The Clean Coalition has been an active and consistent participant throughout the history of the Distribution Resources Plan (“DRP”) proceeding, and have remained a leading participant in the related interconnection proceedings and an active participant in the Integrated Distributed Energy Resources (“IDER”) working groups that seek to integrate DRP results and processes.

In consultation with other parties, in balancing the merits of each motion individually submitted by each of the utilities (“IOUs”), the Clean Coalition supports disallowing redaction requests submitted by SDG&E as overbroad and unsupported by the balancing test or a sufficient factual justification, and adopting the approach offered by PG&E as an interim common measure with refinements to:

1. Ensure consistency across IOUs regarding redaction policies unless clearly warranted by differences in circumstances;

¹Rulemaking 14-08-013, *Administrative Law Judge’s Ruling Ordering Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric Company to File Separate Motions for Confidential Treatment and Redaction of Distribution System Planning Data Ordered by Decisions 17-09-026 and 18-02-004*, June 8, 2018.

2. Establish and clarify limits on the access application and screening process proposed by PG&E;
3. Define critical electric infrastructure information;
4. Review the balance of merit regarding redaction of Facility IDs by facility category.

Future Commission review will be warranted to address factors identified as a risk to security or customer privacy, and to processes adversely impacting effective market participation in the Deferral Framework in a manner consistent with maximizing ratepayer benefits.

DISCUSSION

Consistency

Despite stakeholder objections noted in the June 8 Ruling, the IOUs submitted very different proposals for data redaction in their individual motions. While it is valuable to compare alternative approaches, adopting disparate definitions, practices and procedures between utility service territories is inefficient and best avoided unless clearly warranted by unique circumstance. Unique circumstance have not been demonstrated, and we urge the Commission to pursue a single consistent practice across IOUs.

Critical Infrastructure and Information Access

Clean Coalition strongly encourages the Commission adopt clear and consistent criteria regarding the designation of critical infrastructure to avoid vague interpretations that may be inconsistently applied or overly broad so as to impart unnecessarily restrictive access to information required to support efficient market operation and consequently deny ratepayer benefits.

Within such guidelines, once established, redacting critical infrastructure information on a case-by-case basis, as proposed by PG&E, is a reasonable approach. As noted by other parties, the public interest in disclosing information to help stakeholders understand the planning process and opportunities for DERs to provide grid services must be balanced against the public interest in security. While guidelines and criteria

can offer critical screening standards, judgment within those criteria is important to both identify special circumstances while avoiding blanket restrictions that conflict with other important public interest goals.

We emphasize however, the important distinction between open public access to information and the appropriate degrees of review and restriction to different classes of information. Information that must be kept confidential for operational security purposes will require security protocols for restricted dissemination to any individuals on an as needed basis. Information that must be kept confidential due to market sensitivity will require appropriate restrictions on dissemination based on party status and appropriate non-disclosure agreements. The Commission has experience with these in Procurement Review, Distribution Planning Review, and other contexts. All information otherwise available to the public should not be subject to restrictions merely because it is being disseminated in a context in which access to other information is subject to special conditions. As such, only market sensitive or security controlled information should require vetting or formal non-disclosure agreement processes. We do not oppose simple registration of any recipient of information, and we encourage the use of embedded security identifiers individualized to each recipient for all sensitive data.

In evaluating proposed redactions, we find no justification for redacting information that is otherwise already publicly available. This directly applies to data on circuits, substations, and equipment available through the existing interconnection and Integration Capacity Analysis resources, including maps, spreadsheets, downloadable data sets, and Pre-Application reports, as well as the Transmission Planning Process. The Commission should also consider that information in the public domain beyond Commission jurisdiction cannot be made confidential by the Commission and as such the case for redaction should be seen only in the context of making such information less conveniently available; this applies for example to facilities in direct public view or easily identifiable by readily accessible aerial imaging and maps.

Facility Identification (ID)

We recognize and endorse this importance of restricting information required to exercise remote control of equipment for cyber security purposes. At the same time, it has proven important to have consistent identifiers across data sets to allow their interaction and leverage the efficiencies of data integration across many applications, especially as we seek to optimize the grid operations for resilience, efficiency, and cost-effective application of future distributed energy resource management systems. Review and evaluation of investments related to Grid Needs Assessments may also benefit from the ability to integrate data sets identifying existing equipment locations and capabilities, with no more or less than the necessary degree of granularity and specificity. As such, access to publicly available consistent facility identification designations should be encouraged, while facility identifier codes used in operational control should be subject to full cyber security considerations. These two need not and should not be that same, and the utility should have confidential control over matching public facility IDs with operational control IDs for those facilities.

While only limited locational granularity may be required for many purposes, we note that substation, circuit, and line section identifies and locations are already necessarily publicized, and it will be important to be able to associate equipment with the relevant circuits and line sections it serves, if not the precise location of that equipment.

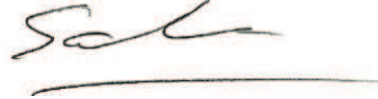
Lastly, we note and acknowledge that data transparency and security require an ongoing balance of merit and review of practices as both new opportunities arise and concerns are identified. We encourage the Commission to allow parties to propose refinements through the Advice Letter process, and periodic review within proceedings.

CONCLUSION

For the reasons above stated, the Clean Coalition requests that the Commission to proceed as described above, and recommends adoption of a consistent redaction

protocol aligned with the PG&E proposal, pending current modifications and future revision.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sahm", is written over a horizontal line.

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Dated: June 22, 2018
Santa Cruz, Ca