



May 7, 2018

CPUC Energy Division
Attn: Tariff Unit
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
EDTariffUnit@cpuc.ca.gov

Re: Protest of San Diego Gas and Electric Company's Advice Letter 3210-E, Pacific Gas and Electric Company's Advice Letter 5276-E, and Southern California Edison Company's Advice Letter 3786-E – Data Redaction Criteria in Response to the Decision D.18-02-004 on the Distribution Investment and Deferral Process.

Clean Coalition's Protest of Data Redaction Criteria Proposed by Advice Letter

Clean Coalition submits this timely protest of the three advice letters regarding the proposed redaction criteria compliance with D.18-02-004: San Diego Gas and Electric Company's Advice Letter 3210-E, Pacific Gas and Electric Company's Advice Letter 5276-E, and Southern California Edison Company's Advice Letter 3786-E. We request modification of these Advice Letters or rejection with instruction from the Commission regarding consistency and compliance with D.18-02-004.

Background

On February 8, 2018, the California Public Utilities Commission (Commission) approved D.18-02-004 on Track 3 Policy Issues, Sub-track 1 on Growth Scenarios and Sub-track 3 on Distribution Investment Deferral Framework. The Decision directs the IOUs to file a Grid Needs Assessment Report (GNA) and Distribution Deferral Opportunity Report (DDOR) on an annual basis. The Decision ordered the IOUs to file Advice Letters supporting stakeholder access to distribution system and planning data

in order to meet Commission goals for engagement with the IOUs and Distribution Resources Plans (DRP) and deferral products, while proposing DRP data redaction criteria to balance electric system cyber security considerations and reflect customer privacy provisions. On April 16, Advice Letters were filed by each IOU as listed. The proposals described in these three Advice Letters are not consistent between IOUs, and the Clean Coalition believes they are not fully consistent with either the orders of D.18-02-004¹ or the goals of the Commission.

Discussion

PG&E neither specifically excludes data, nor specifies criteria by which data will or will not be made available, referring instead to evaluation on a case by case basis.² The failure to establish criteria for data redaction makes it impossible to evaluate their proposal, and invites both unpredictable and inconsistent access to data.

SCE proposes a limited redaction of data,³ and we agree that identification of specific facilities and the rating of these facilities or percentage forecast deficiency may not be needed by respondents and may be redacted without undue harm, and might theoretically offer information that could be present some exploitable vulnerability risk. However, the identification and location of circuits, and the location and details of specific mitigation needs are absolutely central to the distribution deferral process, including the absolute (as opposed to percentage) deficiency.

SDG&E proposes a more extensive range of redaction, with no explanation as to why their evaluation of risk, or actual risk, is not consistent with other California IOUs. While it is appropriate to “assess whether the value of the required deliverable outweighs the potential increase in cyber/physical security threat that is created.”⁴,

¹ D.18-02-004, at 4-5 and 39-40.

² PG&E AL 5276-E, at 2.

³ SCE AL 3786-E, at 2-3.

⁴ SDG&E AL 3210-E, Attachment A, Table 1.

such assessment should be undertaken by the Commission in order to properly ensure input from stakeholders, balance the interests recognized by the Commission, and establish clear standards applicable across multiple proceedings and processes.

Access to data is essential to enable stakeholders to evaluate the Grid Needs Assessment and Distribution Deferral Opportunities Reports by IOUs, as well as for customers and third party providers to appropriately deploy Distributed Energy Resources (DERs) and offer services in support of optimized grid operations or deferral of anticipated but avoidable investments, and to thereby to achieve associated ratepayer benefits. This data is the foundation of the economic case bidders must develop in order to effectively respond to Distribution Investment Deferral opportunities. Additionally, further innovation is most likely to arise from DER aggregators and developers in coordination with DER management system and data analysis providers, and clear and accessible data on grid needs is essential to foster such innovation. This approach will not only result in lower costs for grid operation and infrastructure deferral, but will likely identify additional categories of deferral projects.

Lastly, we note that a useful Application Program Interface (API) is essential to enable identification of co-benefit opportunities, promote efficient distributed resource development, and optimize economic performance of DER such that these resources can provide a range of services at the lowest cost to the customer, the distribution grid operator, and the ISO. Efficient market operation driven by resource competition requires low barriers to access pertinent information. We remind the Commission and IOUs that the location of the electric grid is inherently not secret – it exists in public space for all to see; failure to make this public information available in a useful and efficient electronic format creates a costly barrier to good actors while in no way offering protection from a potential dedicated bad actor. While information regarding grid operations should be appropriately limited, cyber vulnerability is associated with electronic access to the operational control systems, not information on the location of anticipated physical investments.

Conclusion

For the reasons stated above, the Advice Letters should be modified or rejected with instruction from the Commission regarding consistency and compliance with D.18-02-004. The broader issues regarding cyber security, customer privacy, and access to data associated with the GNA, ICA, LNBA, DDOR, interconnection, and market participation exceed the scope of the Advice Letter process and require attention in a more thoroughly participatory and vetted process to establish consistent standards across all areas of jurisdiction by the Commission.

Respectfully submitted,



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