August 29, 2018

Clay Faber
Director, CA & Federal Regulatory
San Diego Gas and Electric
8330 Century Park Court
San Diego, California 92123

Erik Jacobson
Director, Regulatory Relations
77 Beale Street, Mail Code B13U
P.O. Box 770000
San Francisco, CA 94177

Gary Stern, Ph.D
Director, State Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770

Subject: Disposition rejecting without prejudice San Diego Gas & Electric Advice Letter 3210-E, Pacific Gas & Electric Advice Letter 5276-E and Southern California Edison California Edison Advice Letter 3786-E proposing Distribution Resources Planning data redaction criteria pursuant to Decision 18-02-004

Dear Mr. Faber, Mr. Stern and Mr. Jacobson:

San Diego Gas & Electric (SDG&E), Pacific Gas and Electric (PG&E), and Southern California Edison (SCE) filed Advice Letters (AL) 3210-E, AL 5276-E, and AL 3786-E respectively requesting approval of their proposals for Distribution Resource Plan (DRP) data redaction criteria pursuant to Ordering Paragraph (OP) 2.g. of Decision (D.) 18-02-004. The requirements for DRP data redaction were established in the July 24, 2018 Ruling Addressing the IOUs’ Claims for Confidential Treatment and Redaction of Distribution System Planning Data. The July 24 Ruling established uniform DRP data redaction criteria and determined that the Utilities’ proposed criteria in their Advice Letters were inconsistent and deficient. Thus, the ALs are rejected without prejudice.

On April 16, 2018, SDG&E, PG&E, and SCE filed AL 3210-E, AL 5276-E, and AL 3786-E respectively. On May 7, 2018, the following parties filed protests to the Utilities’ Tier 2 Advice Letters: California Energy Storage Alliance (CESA); Clean Coalition; Interstate Renewable Energy Council, Inc. (IREC); The Office of Ratepayer Advocates (ORA); Solar Energy Industries Association (SEIA); and Sunrun, Inc. On May 14th SDG&E, PG&E, and SCE filed their replies to the protests. All protests and replies were timely filed.
Attachment 1 contains a more detailed discussion of the comments, replies to comments, and Energy Division’s determination for rejecting the AL without prejudice.

Please contact Dina Mackin of the Energy Division staff at 415-703-2125 (dina.mackin@cpuc.ca.gov) if you have any questions.

Sincerely,

Edward Randolph
Director, Energy Division

cc:
Service List R.14-08-013
Dina Mackin, Energy Division CPUC – dina.mackin@cpuc.ca.gov
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Review and Analysis

I. Background:

On February 8, 2018 the Commission issued D.18-02-004 on Track 3 Policy Issues, Sub-Track 1 (Growth Scenarios) and Sub-Track 3 (Distribution Investment and Deferral Framework), requiring the investor-owned utilities (IOUs) to established a distribution resources planning process that requires the IOUs to file two new reports—a Grid Needs Assessment (GNA), which documents the forecasting assumptions; and a Distribution Deferral Opportunities Report (DDOR), which must document the planned investments and candidate deferral opportunities. D.18-02-004 included ordering paragraph (OP) 2.g., which ordered the IOUs to file Tier 2 advice letters that proposed DRP data redaction criteria to ensure the physical and cyber security of the electric system and reflect the customer privacy provisions established in D.14-05-016. On April 16, 2018, the IOUs filed their proposals for DRP data redaction criteria in compliance with D.18-02-004 in AL 3210-E (SDG&E), AL 5276-E (PG&E), and AL 3786-E (SCE). SCE and SDG&E proposed several specific redaction criteria focused on physical and cybersecurity concerns and SDG&E also proposed one related to market-sensitive information. PG&E did not identify any specific categorical redactions, but rather proposed that it plans to apply redaction criteria on a case-by-case basis.

II. Party Protests, and Replies to Protests:

On May 7, 2018, CESA, Clean Coalition, IREC, ORA, SEIA, and Sunrun ("Protestors") filed protests to the IOUs’ Advice Letters. The Protestors argued that the requests made by the IOUs for DRP data redaction were inappropriate for the advice letter process pursuant to GO 96-B as they were potentially controversial and raised important policy questions. The Protestors wanted to more carefully review the proposals in a more appropriate procedural forum and develop a consensus list of information items to redact. The Protestors claim that the IOU’s proposals did not provide sufficient evidence that their proposals appropriately address potential cybersecurity threats while still providing sufficient data to third parties to ensure the successful implementation of the DRP data portal. Additionally, the Protestors claim that the proposals are inconsistent with one another and would lead to unpredictable access to data that is essential to developing the distributed energy resources (DER) market. For instance, the Protestors argue that relative to SCE’s and SDG&E’s proposals, PG&E’s proposal lacked specific data redaction criteria and criticized PG&E’s “case-by-case” approach. Furthermore, The Protestors expressed concern that the IOUs would inhibit DER developers from accessing essential information for determining commercial opportunities such as substation, circuit and/or facility IDs; existing facilities and equipment ratings; and forecasted percentage deficiency above the existing facility equipment rating over five years.

On May 14th the IOUs filed their replies to the protests. SCE responded to the Protestors by stating that the proposed data redaction is critical for mitigating physical and cybersecurity threats and that its data redaction criteria will not undermine the DRP goals of transparency and allowing access to essential data needed by DER developers. SCE describes in its reply that the
data categories “Facility ID,” “Existing facility/equipment rating,” and Forecasted percentage deficiency above the existing facility/equipment rating” need to be redacted so as to prevent bad actors from creating a roadmap to identify and attack exploitable locations in SCE’s service territory. PG&E contends that the Protestors misunderstood how PG&E intends to implement a case-by-case approach and that the categories of data PG&E identified in AL 5276-E will have no data redaction other than a standard aggregation and anonymization of customer-specific data. If PG&E determines that specific data needs to be redacted for security, market integrity, or other confidentiality purposes after a case-by-case review, PG&E would still allow qualified DER providers to access the data after consenting to a non-disclosure agreement. SDG&E responded to the Protestors by agreeing that dedicating additional time to pursuing modifications to the IOUs’ proposals could facilitate agreement on the data that should be redacted. Moreover, SDG&E stated that it supported scheduling workshops on the topic but only after approving its proposal in AL 3210-E given the impending release of certain data on July 8, 2018. SDG&E also argued that the data redactions would not limit DER developers’ commercial opportunities as they will be described in the DDOR and shown geographically in the locational net benefit analysis (LNBA)/DDOR maps. Furthermore, the hosting capacity data will be shown in the integrated capacity analysis (ICA) maps. Additionally, SDG&E suggests that the Commission’s adopted data redaction criteria should reflect SDG&E’s proposal rather than SCE’s or PG&E’s as SDG&E finds its criteria to be more extensive than the other IOUs. Furthermore, SDG&E claims that PG&E’s case-by-case approach that could lead to the release of a large amount of data that could later be identified as sensitive.

III. Discussion:

Energy Division rejects without prejudice AL 3210-E (SDG&E), AL 5276-E (PG&E), and AL 3786-E (SCE), because the July 24, 2018 Ruling Addressing the IOUs’ Claims for Confidential Treatment and Redaction of Distribution System Planning Data established the requirements for DRP data redaction for the IOUs. The Assigned ALJ determined that the Utilities’ proposed DRP data redaction criteria in the Advice Letters were inconsistent and deficient both in their identification of allegedly protected classes of data, as well as in their identification of the data redaction criteria that they proposed to utilize. Moreover, the Assigned ALJ determined that the most prudent approach would be to develop his own data redaction criteria and order the IOUs to use them.
ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: Southern California Edison Company
Utility No./Type: 388/Electric
Advice Letter No.: 3786-E
Date AL filed: April 16, 2018
ED Staff Contact: Marc Monbouquette

For Internal Purposes Only:
Date Calendar Clerk Notified
Date Commissioners/Advisors Notified

[X] INITIAL SUSPENSION (up to 120 DAYS)

This is to notify that the above-indicated AL is suspended for up to 120 days beginning May 15, 2018 for the following reason(s) below. If the AL requires a Commission resolution and the Commission’s deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the advice letter will be automatically suspended for up to 180 days beyond the initial suspension period.

[ ] Section 455 Hearing is Required: Resolution needed to address Advice Letter

[ ] Advice Letter Requests a Commission Order

[X] Advice Letter Requires Staff Review

Expected duration of initial suspension period: 120 days

[ ] FURTHER SUSPENSION (up to 180 DAYS beyond initial suspension period)

The AL requires a Commission resolution and the Commission’s deliberation on the resolution prepared by Energy Division has extended beyond the expiration of the initial suspension period. The advice letter is suspended for up to 180 days beyond the initial suspension period.

If you have any questions regarding this matter, please contact Marc Monbouquette at (415) 355-5504 or mm7@cpuc.ca.gov.

cc: ED Tariff Unit (edtariffunit@cpuc.ca.gov); Gabe Petlin for ED (gp1@cpuc.ca.gov); Tim Lindl for Sunrun, Inc. (lindl@keyesfox.com); Jeanne Armstrong for SEIA (Jarmstrong@goodinmacbride.com); Sky Stanfield for IREC (stanfield@smwlaw.com); Chloe Lukins for ORA (chloe.lukins@cpuc.ca.gov); Sahm White for Clean Coalition (sahm@clean-coalition.org)

* Note: reference – Decision D.02-02-049, dated February 21, 2002, and Rule 7.5 in appendix A of D.O7-01-024
ADVICE 3786-E  
(U 338-E) 

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA 
ENERGY DIVISION 

SUBJECT: Southern California Edison Company’s Distribution Resources Plan 
Data Redaction Criteria in Compliance with Decision 18-02-004 

PURPOSE 

Southern California Edison Company (SCE) hereby submits for approval its Distribution 
Resources Plan (DRP) Data Redaction Criteria in compliance with Ordering Paragraph 
(OP) 2g of Decision (D.)18-02-004 (Decision). 

BACKGROUND 

On February 8, 2018, the California Public Utilities Commission (Commission or CPUC) 
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 reports will characterize circuits in 
accordance with data types and attributes described within the Decision. The Commission acknowledges the potential risks to physical and cyber security as well as 
customer privacy that could arise from the publication of certain distribution system 
planning data. The Decision therefore orders the IOUs to file an Advice Letter within 60 
days of issuance proposing DRP data redaction criteria that work to ensure the physical 
and cyber security of the electric system and reflect the customer privacy provisions. 
SCE will redact information per the criteria set forth below, in accordance with the 
procedures set forth in D.16-08-024 and D.17-09-023, and all applicable law. 

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1 R.14-11-001, D.16-08-024 Decision Updating Commission Processes Relating To 
Potentially Confidential Documents (August 18, 2016) and D.17-09-023, Phase 2a Decision
DATA REDACTION CRITERIA

SCE offers limited data redactions as needed to protect customer privacy, cybersecurity, and physical security concerns.

1. Customer Privacy Protection based on 15/15 Aggregation Rules

The “15/15 Rule” for data aggregation was adopted by the CPUC in the Direct Access proceeding (D.97-10-031) to protect customer confidentiality. The “15/15 Rule” will be used to process disclosures of aggregated data to ensure that the released data is sufficiently aggregated to prevent the identification of data on individuals. The “15/15 Rule” requires that any aggregated information provided by SCE must be made up of at least 15 customers and a single customer’s usage must not exceed 15% of the total usage of an assigned category (Residential, Commercial, Agricultural and Commercial).

SCE will redact data in its GNA and DDOR if the “15/15 Rule” (or, if applicable, D.14-05-016) would be violated and the data cannot be aggregated to comply with the aggregation rule. For example, the circuit load profile, demand and DER growth forecasts, and equipment loading – which are data points used as the planning assumptions to determine the grid infrastructure/investment needs – will be redacted for a circuit serving less than fifteen industrial customers. Similar information used to describe the projects in DDOR will also be redacted for a circuit serving less than fifteen industrial customers.

2. Geographic Granularity and Specificity Concern (Physical Security)

SCE takes its role in protecting release of information that could pose a threat to physical or cybersecurity seriously. For example, SCE is an active participant in Proceeding R.15-06-009 before the Commission, which is developing physical security regulations – including those relating to information security – pursuant to PUC Code Section 364. Per Section 3.4.1 of D.18-02-004, “Substation, Circuit, and/or Facility ID” are required to be included in the GNA to “identify the location and system granularity of grid need.” The “[g]eneral geographic region of deferral opportunity, where appropriate, and/or specific location, (e.g., Substation, Circuit, and/or Facility ID)” are to be included in the candidate deferral project shortlist of the DDOR.

SCE believes that the level of specificity to the facility ID requested will produce an exploitable vulnerability that will jeopardize security, rather than promote the reliability of

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Adopting General Order 66-D And Administrative Processes For Submission And Release Of Potentially Confidential Information (September 28, 2017).

2 When applicable, SCE will comply with the standards set forth in D.14-05-016 for sharing anonymized energy usage data with certain governmental/educational agencies and institutions.

3 D.18-02-004 p. 36.
the grid. This data could be utilized in conjunction with other available data by those with hostile intentions to identify and attack exploitable circuits, locations, or customers with little effort. A preferred method to achieve the Commission’s request would be to provide circuit level data without further specifying the facility information.

In addition, Section 3.4.1.2 of D. 18-02-004 requires IOUs to publish “Existing facility/equipment rating” and “Forecasted percentage deficiency above the existing facility/equipment rating over five years.” For similar concerns over physical security, SCE believes that it is sufficient to provide the forecasted deficiency above the existing facility/equipment rating over five years (MW, kVA, or other), instead of showing both the equipment rating and the forecasted percentage deficiency, for third party stakeholders to understand the grid needs.

Consistent with the Decision, all data redaction criteria should also apply to the Integrated Capacity Analysis (ICA) and Locational Net Benefits Analysis (LNBA) data.

**TIER DESIGNATION**

Pursuant to OP 2g, p. 84 of the Decision, this advice filing is submitted with a Tier 2 designation.

**EFFECTIVE DATE**

SCE respectfully requests that this Advice Letter be approved by May 16, 2018, which is 30 days after filing.

**PROTESTS**

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be submitted to:

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this Advice Letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:
There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and must be received by the deadline shown above.

NOTICE

In accordance with General Rule 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B and R.14-08-013 et al. service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-3719. For changes to all other service lists, please contact the Commission’s Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE’s corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE’s web site at https://www.sce.com/wps/portal/home/regulatory/advice-letters.
For questions, please contact Ally Guilliat at (626) 302-4885 or by electronic mail at allison.guilliatt@sce.com.

Southern California Edison Company

/s/ Gary A. Stern, Ph.D.
Gary A. Stern, Ph.D.

GAS:ag:jm
Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:  
☑ ELC  ☐ GAS  ☐ PLC  ☐ HEAT  ☐ WATER

Contact Person: Darrah Morgan  
Phone #: (626) 302-2086  
E-mail: Darrah.Morgan@sce.com

E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

ELC = Electric  GAS = Gas  PLC = Pipeline  HEAT = Heat  WATER = Water

Advice Letter (AL) #: 3786-E  Tier Designation: 2

Subject of AL: Southern California Edison Company's Distribution Resources Plan Data Redaction Criteria in Compliance with Decision 18-02-004

Keywords (choose from CPUC listing): Compliance

AL filing type: ☐ Monthly  ☐ Quarterly  ☐ Annual  ☑ One-Time  ☐ Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: Decision 18-02-004

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☑ No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required? ☐ Yes ☑ No

Requested effective date: 5/16/18  No. of tariff sheets: -0-

Estimated system annual revenue effect: (%): 

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: None

Service affected and changes proposed¹: 

Pending advice letters that revise the same tariff sheets: None

¹ Discuss in AL if more space is needed.
Protests and all other correspondence regarding this AL are due no later 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

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<thead>
<tr>
<th>CPUC, Energy Division</th>
<th>Gary A. Stern, Ph.D.</th>
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<tbody>
<tr>
<td>Attention: Tariff Unit</td>
<td>Managing Director, State Regulatory Operations</td>
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<tr>
<td>505 Van Ness Avenue</td>
<td>Southern California Edison Company</td>
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<td>San Francisco, California 94102</td>
<td>8631 Rush Street</td>
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<td>E-mail: <a href="mailto:EDTariffUnit@cpuc.ca.gov">EDTariffUnit@cpuc.ca.gov</a></td>
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<th>Laura Genao</th>
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<tr>
<td>Managing Director, State Regulatory Affairs</td>
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<td>c/o Karyn Gansecki</td>
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<td>601 Van Ness Avenue, Suite 2030</td>
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<td>E-mail: <a href="mailto:Karyn.Gansecki@sce.com">Karyn.Gansecki@sce.com</a></td>
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