

**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
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
(NOT CONSOLIDATED)	
In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005
And Related Matters.	Application 15-07-007 Application 15-07-008

**RESPONSE OF THE CALIFORNIA ENERGY STORAGE ALLIANCE
TO THE MOTION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) FOR
CONFIDENTIAL TREATMENT AND REDACTION OF DISTRIBUTION SYSTEM
PLANNING DATA PURSUANT TO ADMINISTRATIVE LAW JUDGE’S RULING
DATED JUNE 8, 2018**

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DATED JUNE 8, 2018**

In accordance with Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”) and with the *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* (“Ruling”) issued on June 8, 2018, the California Energy Storage Alliance (“CESA”) hereby submits response

on the *Motion of Pacific Gas and Electric Company (U 39 E) for Confidential Treatment and Redaction of Distribution System Planning Data Pursuant to Administrative Law Judge's Ruling Dated June 8, 2018* ("Motion"), filed by Pacific Gas and Electric Company ("PG&E") on June 15, 2018.

I. RESPONSE.

CESA¹ tentatively supports the data redaction approach proposed by PG&E in its Motion, which allows for general access to sensitive data so long as market participants agree to and execute a non-disclosure agreement ("NDA"). However, among the different criteria proposed among the three investor-owned utilities ("IOUs"), CESA believes that the approach of Southern California Edison Company ("SCE") represents the best practice that balances the need to ensure physical/cyber security and customer privacy and to give distributed energy resource ("DER") solution providers with the information needed to sufficiently understand the distribution grid need(s) and build targeted solutions with the right size/magnitude and characteristics to provide distribution grid services. While supportive of PG&E's approach, CESA believes there are

¹ 8minutenergy Renewables, Able Grid Energy Solutions, Adara Power, Advanced Microgrid Solutions, AltaGas Services, Amber Kinetics, American Honda Motor Company, Inc., Brenmiller Energy, Bright Energy Storage Technologies, BrightSource Energy, Brookfield Renewables, Consolidated Edison Development, Inc., Customized Energy Solutions, Demand Energy, Doosan GridTech, Eagle Crest Energy Company, East Penn Manufacturing Company, Ecoult, EDF Renewable Energy, ElectriQ Power, eMotorWerks, Inc., Energport, Energy Storage Systems Inc., Engie, Fluence Energy, GAF, Geli, Greensmith Energy, Gridscape Solutions, Gridtential Energy, Inc., IE Softworks, Ingersoll Rand, Innovation Core SEI, Inc. (A Sumitomo Electric Company), Iteros, Johnson Controls, Lendlease Energy Development, LG Chem Power, Inc., Lockheed Martin Advanced Energy Storage LLC, LS Power Development, LLC, Magnum CAES, Mercedes-Benz Energy, National Grid, NEC Energy Solutions, Inc., NextEra Energy Resources, NEXTracker, NGK Insulators, Ltd., NICE America Research, NRG Energy, Inc., Ormat Technologies, Parker Hannifin Corporation, Pintail Power, Qnovo, Range Energy Storage Systems, Recurrent Energy, Renewable Energy Systems (RES), Sempra Renewables, Sharp Electronics Corporation, SNC Lavalin, Southwest Generation, Sovereign Energy, STOREME, Inc., Sunrun, Swell Energy, True North Venture Partners, Viridity Energy, Wellhead Electric, and Younicos. The views expressed in these Comments are those of CESA, and do not necessarily reflect the views of all of the individual CESA member companies. (<http://storagealliance.org>).

potential concerns on the application of this case-by-case approach to overly restrict data access, and recommends the use of SCE's data redaction criteria if the Commission moves to standardize an approach across the three IOUs.

In its Motion, PG&E proposed to apply its extensive data redaction criteria for distribution system planning data to market participants who do not sign the appropriate NDAs.² The data categories for redaction are fairly extensive for those not signing a non-disclosure agreement,³ to the degree that the Grid Needs Assessment would be useless and provide no guidance on the distribution grid need or how to structure distributed energy resource ("DER") solutions. As a result, PG&E is taking the approach that many of these data categories may be available upon signing the appropriate non-disclosure agreement, which protects against privacy and security concerns while supporting solicitation and bidding.⁴

While PG&E's Motion details the data categories that would be redacted for non-NDA market participants, it does not provide details on the data categories that would be available or still redacted upon signing an NDA. The Motion implies that disclosure of different data and information may be done on a case-by-case basis depending on whether the data is being used for "legitimate" reasons.⁵ PG&E also explains that it will consider the redaction of market-sensitive unit cost information if anti-competitive behavior is observed.⁶ CESA believes that there is ambiguity in how PG&E will redact different types of distribution data for market participants who have signed NDAs, even as CESA generally supports the approach of using NDAs as a means

² PG&E's Motion, p. 2.

³ These categories include almost all distribution equipment, needs, and cost data because PG&E cites customer privacy, critical infrastructure, or market-sensitive nature of making this information more broadly available.

⁴ *Ibid*, p. 3.

⁵ *Ibid*, p. 8.

⁶ *Ibid*, p. 12.

to balance security and privacy concerns with helpful information needed to support DER service providers. CESA recommends that PG&E provide greater clarity on the data that will be available to market participants that have signed the appropriate NDAs.

In sum, CESA tentatively supports PG&E's approach but requests clarity on the data redaction criteria for market participants that have signed NDAs. However, in reviewing the different IOUs' approaches and criteria, CESA believes that SCE's data redaction criteria best strikes the appropriate balance between the benefits of greater data transparency (and certainty) to DER solution providers and the risks of making too much or too granular information available that could jeopardize security or privacy issues. CESA recommends that the Commission consider whether it is necessary to differentiate the data redaction criteria for each of the IOUs. Instead, CESA believes that there are significant benefits to standardizing the data redaction criteria using the approach proposed by SCE in its Motion.

II. CONCLUSION.

CESA appreciates the opportunity to submit this Response to PG&E's Motion and looks forward to working with the Commission and SCE going forward in this proceeding.

Respectfully submitted,



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