

**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
<b>(NOT CONSOLIDATED)</b>	
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 SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) FOR  
CONFIDENTIAL TREATMENT AND REDACTION OF DISTRIBUTION SYSTEM  
PLANNING DATA ORDERED BY DECISIONS D.17-09-026 AND D.18-02-004**

Alex J. Morris  
Sr. Director, Policy & Regulatory Affairs

Jin Noh  
Policy Manager

**CALIFORNIA ENERGY STORAGE ALLIANCE**  
2150 Allston Way, Suite 210  
Berkeley, California 94704  
Telephone: (310) 617-3441  
Email: [amorris@storagealliance.org](mailto:amorris@storagealliance.org)

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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 Southern California Edison Company (U 338-E) for Confidential Treatment and Redaction of Distribution System Planning Data Ordered by Decisions D.17-09-026 and D.18-02-004* (“Motion”), filed by Southern California Edison Company (“SCE”) on June 15, 2018.

**I. RESPONSE.**

CESA<sup>1</sup> generally supports the data redaction criteria proposed by SCE in its Motion, which allows for greater granularity to understand circuit-level grid needs while guarding against overly granular and revealing data that could be exploited by bad actors. Among the different criteria proposed among the three investor-owned utilities (“IOUs”), CESA believes that SCE’s approach 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.

Given this, CESA agrees that it is reasonable to adopt the “15/15 Rule”, as adopted in Decision (“D.”) 97-10-031, to keep customer-identifiable energy usage information confidential

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<sup>1</sup> 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>).

and to redact information related to critical energy infrastructure information on a case-by-case basis to ensure physical security.<sup>2</sup> Additionally, CESA agrees that facility ID information is not needed to give market participants guidance in proposing distributed energy resource (“DER”) solutions to identified distribution grid needs, as circuit level information should be sufficient.<sup>3</sup>

A key change in SCE’s Motion from its Advice Letter 3786 filing is that SCE is no longer proposing to redact existing facility/equipment rating information and data related to the forecasted percentage deficiency above the existing facility/equipment rating over five years, citing how SCE had previously provided this information publicly.<sup>4</sup> CESA supports this change as it provides DER providers with greater locational guidance to target DER solutions and guidance on the size/magnitude of DER solutions as well as when and how to build these solutions over time to address deficiencies over time. This information is critical for DER providers to build best-fit, cost-effective distribution solutions.

In sum, CESA supports SCE’s data redaction criteria as striking the appropriate balance between the benefits of greater data transparency 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.

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<sup>2</sup> SCE’s Motion, p. 2.

<sup>3</sup> *Ibid*, pp. 2, 7.

<sup>4</sup> *Ibid*, pp. 2-3, 9.

**II. CONCLUSION.**

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

Respectfully submitted,



Alex J. Morris  
Sr. Director, Policy & Regulatory Affairs  
**CALIFORNIA ENERGY STORAGE ALLIANCE**  
2150 Allston Way, Suite 210  
Berkeley, California 94704  
Telephone: (310) 617-3441  
Email: [amorris@storagealliance.org](mailto:amorris@storagealliance.org)

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