

**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 SAN DIEGO GAS AND ELECTRIC COMPANY (U 902-E) FOR
CONFIDENTIAL TREATMENT AND REDACTION OF DISTRIBUTION SYSTEM
PLANNING DATA**

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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 San Diego Gas and Electric Company (U 902-E) for Confidential Treatment and Redaction of Distribution System Planning Data* (“Motion”), filed by San Diego Gas and Electric Company (“SDG&E”) on June 15, 2018.

I. RESPONSE.

CESA¹ does not support the data redaction criteria proposed by SDG&E in its Motion, which proposes to redact six categories of information that would render its distribution planning process useless for distributed energy resource (“DER”) providers in proposing DER solutions to identified distribution grid needs. Among the different criteria proposed among the three investor-owned utilities (“IOUs”), CESA believes that the approach by Southern California Edison Company (“SCE”) represents the best practice that balances the need to ensure physical/cyber security and customer privacy and to give 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, and thus proposes that SDG&E adapt its approach in similar ways to SCE’s approach.

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>).

In its Motion, SDG&E proposes to redact information on facility ID, circuit connectivity/conductor routing, equipment rating/information, mapping information for all identified distribution grid needs, and forecast deficiency above the existing facility/equipment rating over five years, as well as to restrict access to the application programming interface.² Additionally, SDG&E proposes to only provide “directional cost ranges” rather than the actual costs of distribution system upgrades, citing the market-sensitive nature of this information.³ While CESA agrees with a few aspects of SDG&E’s proposed data redaction criteria around keeping customer-identifiable energy usage information confidential and to redact information related to critical energy infrastructure information, we believe that SDG&E’s broad redaction of many data categories makes it impossible for DER providers to develop cost-effective and best-fit solutions to identified distribution grid needs.

SDG&E justifies the redaction of many data categories as allowing bad actors to more accurately target and exploit grid vulnerabilities, but CESA contends that more granular information can be provided, such as circuit-level routing and forecasted deficiencies, without providing specific facility information that would allow bad actors to more surgically target vulnerabilities, thereby striking the right balance between transparency and protection against security and privacy risks. As reference, SDG&E could potentially adopt the approach by SCE where facility ID information is redacted but circuit-level information, existing facility/equipment rating information, and data related to the forecasted percentage deficiency above the existing facility/equipment rating over five years is made available to give market participants with greater locational guidance to target DER solutions and guidance on the size/magnitude of DER solutions,

² SDG&E’s Motion, p. 4.

³ *Ibid*, p. 5.

as well as when and how to build these solutions over time to address deficiencies over time, without creating too much risk to security and customer privacy.⁴ This information is critical for DER providers to build best-fit, cost-effective distribution solutions. Alternatively, at minimum, SDG&E could consider an approach similar to Pacific Gas and Electric Company (“PG&E”) where market participants who sign the appropriate non-disclosure agreements (“NDA”) would gain access to potential sensitive distribution grid information, thereby providing DER providers with the information needed to structure effective solutions. Either SCE’s or PG&E’s approaches would be improvements to the restrictive data redaction criteria proposed by SDG&E in its Motion.

In sum, CESA does not support SDG&E’s data redaction criteria as it tilts too heavily toward protecting against the risks of making too much or too granular information available that could jeopardize security or privacy issues, without adequately weighting the benefits of greater data transparency to DER solution providers. CESA recommends that the Commission reject SDG&E’s data redaction criteria and require SDG&E to adopt an approach along the lines of SCE, or at minimum, of PG&E. CESA also 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.

⁴ SCE’s Motion, pp. 2, 7.

II. CONCLUSION.

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

Respectfully submitted,



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