



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's own Motion to Actively Guide Policy in California's Development of a Smart Grid System.

Rulemaking 08-12-009
(Filed December 18, 2008)

**OPENING COMMENTS OF
PACIFIC GAS AND ELECTRIC COMPANY (U 39 E) ON
PROPOSED POLICIES AND FINDINGS PERTAINING TO
THE SMART GRID**

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TABLE OF CONTENTS

	Page
I. INTRODUCTION	1
II. PG&E’S SMART GRID VISION AND STRATEGY.....	2
III. SMART GRID DEPLOYMENT PLANS UNDER SB 17 SHOULD BE INCREMENTAL, FLEXIBLE AND NON-PRESCRIPTIVE, IN RECOGNITION OF THE STILL-EVOLVING STANDARDS AND FUNCTIONS OF THE SMART GRID.....	5
A. Use of Smart Grid Deployment Plans.....	5
B. Standards for Review of Smart Grid Deployment Plans under SB 17	7
C. Review of Subsequent Smart Grid Investment Plans: Traditional GRCs or Separate Applications	8
D. Uses of Smart Grid Deployment Plan and Procedures and Standards for Evaluating the Smart Grid	9
E. Standards and Protocols Adopted Pursuant to Section 8362	10
F. Should the Commission Measure Smart Grid Deployment Using Quantitative Metrics? What Metrics Should the Utilities Be Required to Use?.....	11
IV. PROGRAMS TO PROVIDE CUSTOMERS AND THIRD PARTIES WITH “NEAR REAL TIME ACCESS” TO ENERGY USAGE AND PRICING DATA SHOULD BE CONSISTENT WITH ALREADY-ADOPTED SMART METER SCHEDULES AND CUSTOMER PRIVACY POLICIES	14
V. THE COMMISSION SHOULD CONSIDER AND COORDINATE ITS SMART GRID POLICIES RELATING TO DEMAND RESPONSE, LOAD MANAGEMENT, RENEWABLE RESOURCES OR ELECTRIC VEHICLES IN THIS PROCEEDING, WITH THE DEVELOPMENT OF POLICIES IN OTHER PROCEEDINGS ON THESE SPECIFIC TOPICS.....	16
VI. WHAT CYBER SECURITY PRINCIPLES SHOULD SMART GRID PROPOSALS MEET?	18
VII. CONCLUSION.....	19

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I. INTRODUCTION

Pursuant to the February 8, 2010, Assigned Commissioner and Administrative Law Judge's Joint Ruling (Ruling) in this proceeding, Pacific Gas and Electric Company (PG&E) provides its opening comments on proposed policies and findings pertaining to the Smart Grid. PG&E's comments address (1) the development and approval of Smart Grid deployment plans pursuant to Senate Bill (SB) 17 (2) rules the Commission may consider regarding access by customers and third parties to energy usage and pricing data; and (3) policies that the Commission should consider related to the needs and impact of demand reduction, load management, renewable resources and electric vehicles on the Smart Grid.

PG&E commends the Assigned Commissioner, ALJ and staff for a thoughtful, forward-looking procedural "roadmap" for the next steps in this important proceeding. California is already playing a leading role in developing proactive policies to implement the vision of a Smart Grid, as demonstrated by this OIR and the Commission's initial policy decision last December. In this phase of the proceeding, the Scoping Memo offers a good "line of sight" for continuing this leadership in 2010, while

continuing to monitor and evaluate development of Smart Grid standards at the national level. Maintaining a balance between California Smart Grid-related policies and activities while leveraging national initiatives and standards should be the most essential task for this proceeding during the next few years.

As discussed in more detail below, PG&E recommends that during the next stage of this OIR: (1) the Commission should support an incremental and flexible approach to the development and use of Smart Grid deployment plans under SB 17, consistent with the approach the Commission endorsed in its 2009 Smart Grid policy decision, D.09-12-046; (2) the Commission should adopt timetables and policies regarding customer and third party access to energy usage and pricing data that reaffirm existing Commission policies regarding Smart Meter and Home Area Network (HAN) deployment and customer privacy, and also leverage national standards being set by standards-setting bodies such as the National Institute of Standards and Technology (“NIST”); and (3) the Commission should move forward to develop generic Smart Grid policies relating to demand reduction, load management, renewables and electric vehicles using and incorporating programs and policies in other relevant Commission proceedings as those specific issues are more fully developed and addressed. Based on these recommendations, the Commission has an opportunity to begin developing the equivalent of a “Smart Grid loading order” for Smart Grid focus and development.

II. PG&E’S SMART GRID VISION AND STRATEGY

The modernization of our electrical grid is central to PG&E’s vision of becoming the leading utility in the United States and to our goal of delighting customers, energizing employees, demonstrating environmental leadership and rewarding shareholders through operational excellence. PG&E is the first utility in California, and

one of the first utilities in the United States, to deploy Smart Meters¹ to all our electric and natural gas customers, including advanced technology to support home area network (“HAN”) applications and functions. These Commission-supported Smart Meter programs have placed California and its investor-owned utilities in the global forefront on Smart Grid implementation.

By the middle of 2012 PG&E will have installed over 10 million Smart Meters systemwide—each one a second generation meter with advanced functions including HAN support and remote connect and disconnect.

PG&E is not resting on its laurels as a national leader in advanced meter technology. We also are actively engaged in developing Smart Grid-related projects and programs in order to lay a strong foundation for PG&E and our customers to deploy additional advanced Smart Grid technologies over the next decade and beyond. These Smart Grid technologies have the potential to help us achieve our critical energy policy goals, including:

- increased integration of renewable energy,
- increased customer energy efficiency, conservation and demand response,
- enhanced system reliability, and
- reduced greenhouse gas emissions.

PG&E believes that the building of the Smart Grid needs to follow a disciplined process starting with the development of standards to assure interoperability and security of the grid, accompanied by rigorous testing of standards-based smart grid technologies before exposing customers to technologies that may not be ready for commercial

¹ “Smart Meters” is a trademark protected name.

application or that may have unintended or unanticipated drawbacks or impacts.

PG&E is very conscious that being a leader and “pioneer” in considering and implementing new technologies requires us to exercise an extra level of care on behalf of our customers and investors. For example, at this early stage in the evolution of Smart Grid technologies, no single accepted supplier of Smart Grid products or infrastructure exists. This makes it incumbent on utilities to be the focal point and system integrators for Smart Grid procurement and scale-up. In so doing, utilities must play a cautious and prudent role in evaluating the new technologies and in making procurement decisions on foundational investments in such technologies. We need to ensure that we do not take on an unacceptable level of risk relating to the installation of new Smart Grid technologies before they are fully tested and proven. Community scale demonstrations and other pilot projects will help us understand the real life benefits and challenges before deploying smart grid technologies across the entire utility network.

We also need to continue to recognize and emphasize that a “Smart Grid” is not an end in itself, but is a process leading to a series of technology choices made in light of accepted and focused objectives and cost-benefit analyses. The Smart Grid is a means—not an end—by which we in California and across the country can modernize our electricity grid and help achieve our highest priority energy policy goals, including addressing climate change, enhancing the reliability of electric service, and providing our customers with more choices and tools for managing their electricity use.

Most of all, we need to recognize that investments in a “Smart Grid” also will require sustained and consistent investments in the grid itself, over a long term. Because of the capital intensive nature of electric system investments, PG&E strongly believes

that we can achieve our Smart Grid investment goals at a reasonable cost to our customers—but only if we are willing to commit to sustained and consistent regulatory policies that balance the costs and benefits to our customers over the long run, based on our country’s long term energy policy goals, not based on short-term fads or public policy whims. These regulatory policies will need a “laser-sharp” focus on practical and feasible objectives to achieve the kind of success that we all expect from the Smart Grid “vision.”

With these principles in mind, we next address the specific questions and proposals put forward in the Ruling.

III. SMART GRID DEPLOYMENT PLANS UNDER SB 17 SHOULD BE INCREMENTAL, FLEXIBLE AND NON-PRESCRIPTIVE, IN RECOGNITION OF THE STILL-EVOLVING STANDARDS AND FUNCTIONS OF THE SMART GRID

A. Use of Smart Grid Deployment Plans

The Ruling proposes that approval of a SB 17 Smart Grid deployment plan would establish a baseline for measuring deployment of Smart Grid technologies and capabilities. Moreover, Smart Grid uses identified in a deployment plan would require less detailed information on the costs and benefits of the Smart Grid than would the adoption of a deployment plan that conveys a presumption of reasonableness on future investments. However, the Smart Grid deployment plan would not rise to the level of a binding “plan” against which the utility’s reasonableness in complying with or implementing the plan would be measured for purposes of cost recovery and ratemaking. The Ruling also recommends that a utility be required to file periodic status reports that provide updates to the plan. The Ruling proposes that status reports be filed every year starting on October 1, 2010.

PG&E agrees that SB 17 deployment plans can and should be a rich source of information and data on which California's progress in developing and implementing a Smart Grid can be monitored and measured. PG&E supports using SB 17 deployment plans for this purpose.

However, at this early stage in establishing Smart Grid standards and policies, the deployment plans should not be used as "one size fits all" plans for purposes of determining the merits or benefits of specific Smart Grid investments and projects that may be proposed in GRCs or individual utility applications. Instead, the deployment plans should be a source of policy guidance, information and evidentiary support for Smart Grid projects and investments, but not mandatory or binding in individual proceedings. Many of the objectives of the Smart Grid "vision"—such as lower greenhouse gas emissions, greater renewables and distributed generation, and more customer-driven energy efficiency—are dependent on complementary regulatory policies and incentives in other proceedings, not on the technological underpinnings or feasibility of the grid itself.

It is important that the Commission clarify that the "baseline for measuring deployment" established in deployment plans is not prescriptive, but a source of information and policy direction that can inform individual Smart Grid proposals without restricting the Commission's ability to consider those proposals on their own individual merits, on an incremental and flexible basis, as standards and structure for the Smart Grid evolve.

The needs for Smart Grid capabilities for each utility will vary and each utility is at a different starting point. By developing Smart Grid capabilities based on national

standards for inter-operability, functionality and cyber-security, the technologies will be compatible across California without the requirement that utilities march in lock step. PG&E does not recommend that the Commission establish a particular frequency of updating or reporting on Smart Grid progress under SB 17. Instead, we recommend that the Commission provide for an initial status report on Smart Grid deployment plans two years after approval of the first plans. Based on that status report, the Commission can determine how frequently to require subsequent reports and plan updates.

B. Standards for Review of Smart Grid Deployment Plans under SB 17

The Ruling proposes that, in filing their deployment plans, utilities should discuss in detail how their vision of the Smart Grid will perform in each of the relevant areas, particularly with reference to the relevant sections of SB 17 (§ 8360 and § 8366) and other criteria listed in the Ruling. Utilities should also give a timeline stating the current state of their system and what it will take to build a Smart Grid system. Utilities also should give an estimate of the financial investment necessary to build such a system.

PG&E appreciates and commends the staff for the list of specific criteria and principles in the Ruling. SB 17 criteria and goals must be taken into account in the development and review of Smart Grid deployment plans. However, the evolution of the Smart Grid will not follow a neat and prescribed set of goals and criteria. By its nature, the Smart Grid will be informed along the way by events in the marketplace as technologies and applications are vetted by real world experience. Some technologies will work, some will fail, and the Commission, utilities and interested parties need to continue to understand that reality. This is also why the assessment of costs and benefits needs to continually be updated as new technologies develop, are proven and then scaled

up.

As the Commission and most parties acknowledged in the earlier phase of this proceeding, the Smart Grid is still a “vision” rather than a specific end-state or set of specific functionalities that can be measured and generically costed and implemented. Extensive work is ongoing on at the national and international level, such as at NIST, to develop the “building blocks” of the Smart Grid—interoperability and functionality standards. PG&E believes that it is premature for the Commission to expect the utilities to be able to provide specific timelines and cost estimates of their “visions” of the Smart Grid outside of individual projects and investments. Instead, the Commission, utilities and interested parties have much more to gain at this early stage by monitoring and updating the information available in the marketplace and from standard-setting and R&D bodies. This information should include market data and R&D results which reflect the evolving consensus among all market participants as well as examples of pilot and demonstration projects that will help turn the Smart Grid “vision” into scalable, concrete enhancements to the electric grid.

In the workshops in this proceeding, PG&E looks forward to helping establish a common framework for monitoring, reporting and sharing information among utilities, the Commission and other interested parties on specific Smart Grid projects as well as on the development of Smart Grid standards at NIST and other standard-setting bodies.

C. Review of Subsequent Smart Grid Investment Plans: Traditional GRCs or Separate Applications

The Ruling proposes that initial and updated utility Smart Grid deployment plans be considered in a single proceeding. PG&E agrees that initial deployment plans can more efficiently be considered in one Commission proceeding. However, subsequent

updates and revisions to individual utility plans should be considered in individual utility proceedings, consistent with the different procedural schedules for utility GRCs and individual applications in which Smart Grid deployment plans may be implemented or used. Because utilities are on different GRC schedules, the level of detail available regarding specific Smart Grid projects, investments and programs may vary, depending on whether a utility is ready to propose specific investments and expenditures in their detailed, current GRC applications or other applications.

For PG&E, we have a current GRC pending before the Commission for decision by the end of 2010, and our next GRC would not be filed until December, 2012, to be effective January 1, 2014. Thus, PG&E's pending GRC does not include a comprehensive Smart Grid investment strategy because we were just beginning our assessment and planning at the time the filing was developed. We do expect to provide a robust Smart Grid "vision" in our July 1, 2011, SB 17 Smart Grid deployment plan, with information on our "foundational" activities in support of that vision. We also would intend to provide more detailed and specific Smart Grid related investment proposals as part of our next GRC filing or specific applications in the 2011- 2013 time frame. In this way, the Commission and interested parties will have the benefit of PG&E's concrete Smart Grid-related proposals to review in actual Commission proceedings.

D. Uses of Smart Grid Deployment Plan and Procedures and Standards for Evaluating the Smart Grid

The Ruling requests comments on the uses of Smart Grid deployment plans, and what requirements should guide the Commission's review and approval of deployment plans.

PG&E recommends that initial deployment plans be reviewed in one proceeding, but that the Commission allow a good deal of flexibility and leeway in what the plans must contain and demonstrate. This is consistent with spurring and incenting innovation and variety rather than a “one size fits all” or “single point in time” approach, especially in light of different drivers and different starting points among utilities and other market participants. As the Smart Grid evolves through technology innovation, pilot projects, and scaled-up demonstrations, there needs to be a wide variety of specific proposals, programs and investments to consider on their own merits, without regulatory restrictions or prejudice.

Moreover, the Commission is not the only regulatory player in this field—the Federal Energy Regulatory Commission, NIST, environmental agencies and even the Homeland Security Department all will play a role. Thus, all participants in the Smart Grid will be better off if the Commission avoids imposing “top down” requirements and criteria on the requirements for initial Smart Grid deployment plans. Instead, the Commission should encourage and invite a broad and flexible approach to what should be included and reported in Smart Grid deployment plans. Successful Smart Grid deployment is more likely to be measured by incremental progress even if some may say it does not go fast enough, rather than by accelerated and infeasible schedules that others later say went too fast.

E. Standards and Protocols Adopted Pursuant to Section 8362

The Ruling requests comment on whether the Commission should adopt a California-only “performance standard” in this proceeding to ensure functionality and interoperability of the Smart Grid, or instead should defer to national and international standard-setting bodies.

PG&E recommends that the Commission continue to defer to the national and international standard-setting bodies, such as NIST, and not attempt to set California-only standards for interoperability or functionality at this early stage. National standards will help drive costs down and broaden the availability of new products in the marketplace, while also ensuring the necessary degree of backward systems compatibility. It will be these national standards that determine the capabilities and performance of the Smart Grid. Conversely, California-only standards and technology specifications are likely to confuse, “balkanize” and decelerate the Smart Grid marketplace and vendors. Fortunately, the national standard-setting process is well underway, so that California need not play a role in seeking to accelerate the standard-setting process.

The Commission can require utilities and other interested parties to keep it informed on the progress of the national standard-setting effort, and periodically convene workshops to update itself and interested parties on the status and applicability of the standards to California utilities. At the time when the standards have progressed sufficiently to affect the investment and programmatic strategies of the utilities, the Commission can convene a more formal proceeding to evaluate whether any additional or supplemental standards are needed for “California-only” Smart Grid policies and goals, including how to ensure compatibility and consistency among investor-owned and publicly-owned utilities.

F. Should the Commission Measure Smart Grid Deployment Using Quantitative Metrics? What Metrics Should the Utilities Be Required to Use?

The Ruling includes staff-developed proposed metrics for measuring Smart Grid performance and progress. The Ruling proposes that the Commission adopt the metrics

and require each utility to measure and report its performance relative to the metrics as part of its Smart Grid deployment plan.

PG&E appreciates the benefit of objective metrics for measuring and monitoring the costs and benefits of Smart Grid plans, programs and projects. The Commission staff has done a good and comprehensive job in teeing up a broad “menu” of possible metrics to consider for monitoring and measuring Smart Grid progress under SB 17 and other Smart Grid policies. The proposed metrics include a wide range of potential criteria, both quantitative and qualitative, that have been drawn from various sources, including metrics used and reported previously for certain utility activities and programs.

PG&E agrees that coming up with consensus, objective metrics for tracking Smart Grid progress is a very laudable goal. However, choosing the right metrics that actually provide useful and objective information on achieving Smart Grid goals is a challenge, because the Smart Grid itself is still a “concept” and not a concrete program or project. Choosing the wrong metrics, or metrics that merely measure “process” rather than “outcome,” can do significant damage to incentives for development of new Smart Grid technologies and projects. Until the various “visions” of the Smart Grid can evolve further into specific programs and projects, it is difficult and potentially misleading for the Commission, utilities and third-parties to settle on objective, quantitative metrics that would apply for purposes of regulating or monitoring various Smart Grid activities and projects. Likewise, until there is a broader consensus at the national and international levels on the standards for functionality and interoperability that should apply to the Smart Grid, it is equally difficult to promulgate a set of metrics

that provides useful and relevant information.

Nonetheless, PG&E believes that a number of the staff proposed metrics should be discussed and considered for initial reporting on Smart Grid activities. These include the following metrics culled from the staff list:

- Reliability Metrics - SAIDI
- Reliability Metrics - SAIFI
- Renewable Resources Integrated - MWh of delivered renewables (prior year)
- AMI Meters Installed - Total Number and as a % of Total
- Home Area Network Coverage - Number and % of Customers registered to use 1 or more HAN devices
- Demand Response - Total MW of Dispatchable Demand Response
- Energy Efficiency - GWh of EE Savings
- Dynamic Pricing - Number and % of Customers enrolled in time differentiated rate programs
- Customer Information Access - Number and % of Customers enrolled with utility to access customer usage and pricing data

Although the precise “metric” to be used on these activities, and how useful each metric may be for overall Smart Grid purposes, remains to be discussed and considered, PG&E recommends that utilities, Commission staff and interested parties begin with this list of possible metrics as part of our discussions in the Smart Grid workshops. In addition, as part of the workshops, PG&E recommends that all parties carefully consider the timing for development and use of any metrics, given the still-pending status of efforts at the national and international levels to finalize Smart Grid interoperability and functionality standards for commercial-scale Smart Grid projects and programs. These national and international Smart Grid standards hold the promise of providing a means of monitoring and measuring Smart Grid activities on a national and international scale, not just among California utilities, and thus can be the source of more credible metrics to use in California.

IV. PROGRAMS TO PROVIDE CUSTOMERS AND THIRD PARTIES WITH “NEAR REAL TIME ACCESS” TO ENERGY USAGE AND PRICING DATA SHOULD BE CONSISTENT WITH ALREADY-ADOPTED SMART METER SCHEDULES AND CUSTOMER PRIVACY POLICIES

The Ruling seeks comments concerning the rules that the Commission should adopt to meet the objectives of providing access to wholesale and retail price data, access to usage data for authorized third parties, and access on a near real time basis to usage data by consumers and/or authorized third parties. Attachment B of the Ruling provides a draft of possible rules that are modeled on rules adopted by the Texas Public Utilities Commission and on Tariff Rule 22, which was adopted previously to implement direct access service in California and to provide Energy Service Providers access to usage information collected by traditional meters that are read once a month.

PG&E agrees that the Commission’s existing customer privacy rules should be the basis of rules regarding third-party access to customer energy usage data and other customer-specific data. In addition to the precedents cited by the Ruling relating to California’s direct access tariffs, other tariff provisions already provide a clear and consistent approach to third-party access to customer data. For example, PG&E’s Electric Rule 9 implements the Commission’s long-standing policy for protecting customer privacy, under the heading “Privacy of Customer Information”:

“To preserve customer privacy, PG&E will not release confidential information, including financial information, to a third party without the customer’s electronic signature or the written consent.”

(PG&E Electric Rule 9.M.)

Likewise, the Commission should consider and coordinate its development of “near real time access” rules for customer data with the current implementation schedules and policies applicable to the utilities’ SmartMeter, home area network, and

other demand response and customer-side programs and activities. In considering the scope and schedule for “near real time access,” the Commission should carefully consider and ensure the following key requirements are understood and met *before* setting any scope and schedule for providing this information and access:

- “Real time access” to customer usage and pricing information can only come from localized access to such information through a Home Area Network device at the customer’s premises—*not* from utility “back office” data collection and communication facilities. Understanding this fundamental limit in utility capabilities is a key driver of the scope and schedule for providing “near real time” or “real time” access to the customer. The work at NIST and on “OpenADE” standards will assist in establishing the feasible protocols associated with this access, provided that the work does not get diverted into an inefficient and costly “let’s pick winners and losers” effort.
- The costs of providing “near real time access” must be reasonable and fully recoverable in rates. Goals for customer and third-party access must go through a disciplined “cost-benefit” analysis which demonstrates clear customer benefits before the goals are formally adopted as Smart Grid policies;
- The scope of “near real time access” and the schedule for implementation must be feasible and not disrupt or threaten existing utility billing and metering services to customers;
- The “near real time access” must be consistent with existing utility

programs and activities that provide customers with information on their energy usage and prices, e.g. demand-response, customer energy efficiency and distributed generation programs. There must be clear, up-front consumer protection standards and protections to preclude consumer fraud and vendor over-reaching in the access to and use of customer information.

- The “near real time access” must directly support and serve California’s energy policy goals without diverting resources or confusing customers on other energy policy goals and programs, both at the retail customer level and in wholesale and grid markets.

PG&E looks forward to discussing the specifics of these potential rules and deadlines in more detail at the upcoming workshops.

V. THE COMMISSION SHOULD CONSIDER AND COORDINATE ITS SMART GRID POLICIES RELATING TO DEMAND RESPONSE, LOAD MANAGEMENT, RENEWABLE RESOURCES OR ELECTRIC VEHICLES IN THIS PROCEEDING, WITH THE DEVELOPMENT OF POLICIES IN OTHER PROCEEDINGS ON THESE SPECIFIC TOPICS

The Ruling asks whether incentives are needed to encourage the deployment of consumer devices that interact with the Smart Grid. The Ruling also asks whether establishment of a demarcation point between utility and consumer help or hurt such deployment. Does a physical demarcation point make sense in an electronics world? Similarly, the Ruling asks whether and how the OIR should take into account specific issues relating to electric vehicles and energy storage.

PG&E recommends that discussions relating to consumer device-specific incentives be undertaken in the respective public or ratemaking proceedings in which programs or activities related to the devices are being considered, e.g. electric vehicle

incentives in the Electric Vehicle OIR; demand response device incentives in demand response proceedings; energy efficiency device incentives in Customer Energy Efficiency proceedings. For purposes of an overview of such devices and available incentives, it may be useful to include a “catalogue” of pending proceedings and incentives in each utility’s Smart Grid deployment plan, as a means of providing a “big picture” on how such devices and programs may be affecting the deployment and structure of the Smart Grid. PG&E believes that the Smart Grid cuts across all aspects of utility service, and therefore coordination in regulatory proceedings addressing all aspects of utility service is required as well.

Given the nascent and evolving nature of customer-side devices and programs, PG&E does not recommend that the Commission or parties attempt a “bright line” demarcation point between utility and non-utility Smart Grid devices and programs at this time, other than in a legal, jurisdictional sense. As the necessary role of the utilities as system integrators of Smart Grid technologies develops, particularly in the area of distribution grid reliability and distributed resource integration, the appropriate demarcation point between the utility and non-utility will depend on the systems integration function that the utility must perform. It is extremely important for purposes of both grid reliability and innovation and flexibility that the Commission encourage a wide variety of market participants and potential programs, and let utilities, vendors and customers then choose the devices and investments that can be proven and scaled-up for commercial use on an integrated basis with the utility’s overall grid and customer service systems. Setting an arbitrary or uninformed demarcation point could hinder this effort.

Likewise, PG&E recommends that energy storage options be considered in the same way as other Smart Grid or generation-related or transmission-related investments and projects – on their own merits in individual CPUC or FERC proceedings rather than on a generic basis in this proceeding. On the other hand, the utilities’ Smart Grid deployment plans can provide updated information on energy storage projects and programs for the purposes of overall monitoring of Smart Grid progress.

VI. WHAT CYBER SECURITY PRINCIPLES SHOULD SMART GRID PROPOSALS MEET?

The Ruling notes that the security of California’s electric grid and the privacy of California’s citizens are of major importance to the Commission. The Ruling asks parties to provide comments on how the Commission can ensure that the Smart Grid proposals funded in California provide the security for the network and privacy protections needed. Most specifically, the Commission is interested in developing appropriate cyber-security rules that enable the Commission to implement the policies related to third-party access to customer data and information.

PG&E agrees with the Ruling that maintaining robust and fully compliant cyber-security protection for utility systems and customer information is of utmost importance as we move forward with new Smart Grid technologies. To that end, we believe that rules relating to third-party access to customer and utility information need to be evaluated in light of national cyber-security protections and standards. PG&E is and has been continuously monitoring and participating in the national standard-setting forums on cyber-security, and updating and assimilating new “best practices” and security measures to enhance our existing protocols and protections. We do not believe that California-specific cyber-security standards are necessary and in fact could be counter-

productive, inefficient and costly. However, we do believe that the Commission, utilities and interested parties should directly monitor and keep updated on national cyber-security forums and developments. PG&E is available to assist in that effort as appropriate.

VII. CONCLUSION

PG&E commends the Assigned Commissioner, ALJ and Commission staff for the scope and agenda proposed by the Ruling for 2010 Smart Grid policymaking. We look forward to working through these issues and proposals in detail in the workshops and additional comments and phases of this proceeding, including the development and review of utility-specific deployment plans under SB 17.

Respectfully Submitted,
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Last Updated: March 8, 2010

CPUC DOCKET NO. R0812009

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Last Updated: March 8, 2010

CPUC DOCKET NO. R0812009

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Last Updated: March 8, 2010

CPUC DOCKET NO. R0812009

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Last Updated: March 8, 2010

CPUC DOCKET NO. R0812009

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CPUC DOCKET NO. R0812009

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CPUC DOCKET NO. R0812009

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Last Updated: March 8, 2010

CPUC DOCKET NO. R0812009

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THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA SERVICE LIST

Last Updated: March 8, 2010

CPUC DOCKET NO. R0812009

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CPUC DOCKET NO. R0812009

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