

**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)

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E)
ON THE PROPOSED DECISION OF COMMISSIONER MICHAEL R. PEEVEY**

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**I.
INTRODUCTION**

In compliance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (the "Commission"), San Diego Gas & Electric Company ("SDG&E") hereby provides its comments on the proposed *Decision Adopting Rules to Protect the Privacy and Security of the Electricity Usage Data of the Customers of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company* ("PD") of Commissioner Michael R. Peevey, mailed May 6, 2011, in the above-noted docket. SDG&E is strongly committed to protecting customer privacy and supports the Commission's proposed findings and conclusions, with the caveats noted below in Section III.

**II.
BACKGROUND**

This proceeding was initiated to consider setting policies, standards and protocols, consistent with the state and federal statutory requirements, aimed at guiding the development of a smart grid system in ways beneficial to California. Since this proceeding commenced in 2008, through the enactment of Senate Bill (SB) 1476 (Padilla), the California legislature have enshrined the importance of prohibiting unauthorized third party access to a customer's electrical

or gas consumption data generated by an electrical or gas corporation's advanced metering infrastructure. In particular, the Legislative Counsel's Digest, which is printed on the first page of the bill and contains a brief summary of the effect of the bill, states in part that "[t]his bill would prohibit an electrical corporation or gas corporation from sharing, disclosing, or otherwise making accessible to any 3rd party a customer's electrical or gas consumption data, as defined, except as specified, and would require those utilities to use reasonable security procedures and practices to protect a customer's unencrypted electrical and gas consumption data from unauthorized access, destruction, use, modification, or disclosure,"¹ SB 1476 was signed into law by former Governor Arnold Schwarzenegger on September 29, 2010.²

With the enactment of SB 1476 (added to Division 4.1 of the Public Utilities Code as §§ 8380-8381), "compliance with its specific requirements became a major aspect of the Commission's efforts to ensure that the privacy and security rules adopted by the Commission protect consumers."³ This PD adopts rules to protect the privacy and security of customer consumption data collected from Smart Meters deployed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and SDG&E. The rules adopted are intended to implement the statutory protections required by Public Utilities Code §§ 8380-8381. The PD provides that "[t]he adopted privacy and security rules apply to PG&E, SCE, and SDG&E, the companies that assist them in utility operations, companies under contract with the utilities, and other companies that, after authorization by a customer, gain access to the customer's usage data from the utility either via the internet or through a connection with the Smart Meter that forwards that data without further customer action."⁴

¹ Chapter 497, Statutes of 2010.

² *Id.*

³ PD, at p. 5.

⁴ PD, at p. 2.

The PD is the product of an extensive effort by the Commission staff and interested parties to develop a framework for implementing Public Utilities Code §§ 8380-8381. The Commission is to be commended for taking these positive steps toward effectively addressing the myriad of important policy issues associated with implementing workable privacy and security measures for protecting a customer’s electrical consumption data, including setting adequate third party access requirements.

The development of these rules to protect the privacy and security of the electricity usage data of our customers will play a critical role in reaching the state’s Smart Grid goals. SDG&E looks forward to working with the Commission, and other key stakeholders, in the near future to implement the future policy direction put forward by this decision. As is explained in greater detail below, SDG&E herein proposes limited revisions to the PD in order to more fully define and clarify certain details related to the definitions, proposed rules, and policies for sharing, disclosing, or otherwise making accessible to any third party entity a customer’s electrical or gas consumption data, pursuant to the requirements of Public Utilities Code §§ 8380-8381.

**III.
THE PD SHOULD BE REVISED TO INCORPORATE LIMITED CLARIFICATIONS
TO ENSURE CONSISTENCY WITH SB 1476**

A. Definition and Scope of “Covered Entity”

The PD⁵ and Attachment D⁶ both adopt the following proposed definition of a “covered entity”.

⁵ PD, at p. 43.

⁶ Attachment D, at p. 1.

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

1. DEFINITIONS

(a) **Covered Entity.** A “covered entity” is (1) any electrical corporation⁷ or (2) any third party that collects, stores, uses, or discloses covered information relating to 11 or more customers who obtains this information from an electrical corporation or through the registration of a locked device that transfers information to that third party.⁸

While SDG&E recognizes that defining the individuals or entities considered a “covered entity” for purpose of the privacy requirements is difficult and may be complex, the definition of “Covered Entity” under subsection 1(a)(2) is inherently ambiguous or vague because its meaning conflicts with the express language of Public Utilities Code §§ 8380-8381.⁹ Specifically, the term “any third party” within subsection 1(a)(2) of the definition is too broad and encompassing because as written the extension of the word “Covered Entity” is the set of all (past, present and future) covered entities in the world: the set includes any electrical corporation, affiliate, vendor, individual, organization, trust, charity, or business, and so on that has a legal and separate identifiable existence.

Clearly the Commission proposed definition of a “Covered Entity” for the purpose of governing privacy and security pertains to condition 1(a)(1) “any electrical corporation”. As per the record and PD, which is outline in Section 4,¹⁰ no party disputes that the Commission has

⁷ At this time “any electrical corporation” includes only PG&E, SCE, and SDG&E. Phase 2 of this proceeding will determine whether these rules should apply to gas corporations and other electrical corporations.

⁸ The Commission and its agents, including but not limited to contractors and consultants, are not “covered entities” subject to these rules because the Commission and its agents are subject to separate statutory provisions pertaining to data. In addition, these rules do not apply at this time to gas corporations, other electrical corporations, community choice aggregators, or electric service providers. Phase 2 of this proceeding will make that determination.

⁹ As used herein the extension of the word consists of the concept, idea or things to which it applies, in contrast with its comprehension or intension, which consists very roughly of the properties, or corresponding purpose that are implied or suggested by the concept in question.

¹⁰ PD, at pp. 20-30.

jurisdictional authority over CPUC-regulated entities (e.g. any electrical corporations). However, SDG&E believes that adoption of this broad definition of “Covered Entity” would create some ambiguity or vagueness with the words of Public Utilities Code §§ 8380-8381, which plain and straightforward statutory language distinguishes between any third party entities obtaining electrical consumption data from an electrical corporation that are affiliated with, or have a business relationship with the electric utility (irrespective of whether the disclosed covered information relates to 1 or 11 or more customers); and any unaffiliated third party entities that a customer chooses to disclose his or her electrical consumption data to (regardless of the number of customers that chose to disclose their information to a third party entity unaffiliated with, or that has no business relationship with the electric utility). Specifically, Public Utilities Code § 8380(b)(1) provides that:

(b) (1) An electrical corporation or gas corporation shall not share, disclose, or otherwise make accessible to any third party a customer’s electrical or gas consumption data, except as provided in subdivision (e) or upon the consent of the customer. [Emphasis added].

Furthermore, both Public Utilities Code § 8380(f) and § 8381(f) provide that:

(f) If a customer chooses to disclose his or her electrical or gas consumption data to a third party that is unaffiliated with, and has no other business relationship with, the electrical or gas corporation, the electrical or gas corporation shall not be responsible for the security of that data, or its use or misuse. [Emphasis added].

Thus, as the precise meaning of the word “Covered Entity” adopted in the PD is unclear in the context of the above-cited statutory provisions pertaining to any third party, the definition should be revised in a manner that avoids a consequence, otherwise arising, that would be incompatible with Public Utilities Code §§ 8380-8381. Moreover, because the provisions of Public Utilities Code §§ 8380-8381, and this PD, only adopt rules to protect the privacy and security of customer consumption data collected from Smart Meters deployed by PG&E, SCE,

and SDG&E,¹¹ the term “collects” within subsection 1(a)(2) of the definition of “Covered Entity” should be changed to “accesses,” because these rules are not intended to regulate other information collected by third parties when authorized by the customer.

Wherefore, in accordance with Public Utilities Code at § 8380(b)(1), SDG&E proposes the word “Covered Entity” should be revised to include three separate categories of entities consisting of: (1) any electrical corporation; (2) any third party affiliated with or in a business relationship with an electrical corporation; or (3) any other third party, when authorized by the customer, that accesses, stores, uses, or discloses covered information relating to 11 or more customers who obtains this information from an electrical corporation.

B. Definition of “Locked”

Similar to the above, SDG&E also recommends that the decision either omit or further define the term “Locked Device” to more precisely define how the loosely defined factor or element is intended by the Commission to be used in the PD to avoid any potential ambiguity. The PD at p. 2, in footnote 1, introduces a new conditional term that “[a] device is “locked” to a service provider if that particular device can only be used by that single provider of energy services. This definition follows that used in wireless telecommunications, in which a “locked” wireless phone will only work on one company’s network.”¹²

SDG&E asserts that the concept of “locked” vs. “unlocked” devices used in wireless telecommunications does not readily correspond as it is intended in the PD to the registration of Home Area Network (HAN) technology, and was not previously raised as an issue in the above captioned proceeding, is unsupported by the record, and would require further discussion by parties in order to fully understand the connected limitations and ramifications of the proposed

¹¹ See *e.g.*, Public Utilities Code at § 8380(a); see also PD, at p. 1.

¹² PD, at p. 2.

“locked” device concept. Accordingly, SDG&E respectfully submit that the “locked” device term or requirement is premature and would necessitate a more thorough investigation of the technical methods available, if any, to ensure that any registered third party HAN devices will remain “locked” and can only be “unlocked” by the electrical corporation upon the written request of a customer. This preliminary step is reasonably necessary to determine the overall feasibility of maintaining the actual status of the HAN device (locked, terminated disclosure, or unlocked), which as the definition suggests, may impact the regulatory status of a third party (as Covered Entity or non-covered entity).

To begin with, SDG&E believe that the proposed definition may have little meaning in the context of an emerging HAN technology environment. If a device is registered on the HAN, by the HAN’s very purpose and capabilities, that device is connected to the HAN, and therefore “covered information” is passed through the HAN, and may be spread through many other HAN compatible hardware, nodes or additional linked devices.

SDG&E further observes that this “locked” concept is technologically flawed because the utility cannot currently verify when a “locked” device becomes “unlocked” as between the customer and the covered third party entity. A third party service provider or technology vendor can simply circumvent any “locked” device capabilities by allowing their proprietary piece of equipment to communicate directly with a remote computer, device, or machine that could readily convert “covered information” to a number of common data formats (e.g., xls, html, etc.). Under an adaptation scenario, the “registered” device may present anomalies that seemingly appear it is synched and transferring customer information directly to the single registered service provider, but in reality the encryption keys are no longer properly engaged, and the device would not be securely “locked” or remain “locked” for purposes of the device ensuring

privacy, security or data content protection. Thus, this type of secondary technology transfer, in “disguised” form, would not necessarily be captured under the proposed definition of “locked.”

Finally, SDG&E is unclear as to the purpose of the “locked” definition in as much as it pertains to non-utility controlled assets. Let’s take for example that an appliance (e.g., laundry machine, clothes washer, or washer) has HAN Zigbee communications capabilities.¹³ The washer is manufactured by a specific vendor and only that vendor can receive proprietary or encrypted alarm information regarding the status of several sensors included in the washer. Assume further that the washer is programmed by the customer so that it will not operate during an SDG&E designated high usage “event” period or when that specific customer is showing abnormally high usage during the on-peak period. Presumably under this example the only identified entity receiving these event signals from SDG&E’s Advanced Metering Infrastructure, for non-operation, would likely be the customer who has requested registration of his or her appliance device. Thus, would the appliance manufacturer be regarded as a third party “covered entity” through the registration of a locked device where the vendor by virtue of product design can independently receive secondary alarm information regarding the operational status of the washer? And if so, would this “covered entity” be subject to the privacy and security rules as proposed in the PD? Is SDG&E responsible for monitoring and assessing whether the appliance manufacturer has complied with these rules, and if so, should SDG&E then cease transferring the “event” signal to the appliance where SDG&E suspects a manufacturer has either knowingly or unknowingly violated these rules?

If the Commission’s expectation under the PD is that the utility is responsible for determining during a device’s registration process whether the particular device (technology) is

¹³ SDG&E notes that this example could be equally applicable to plug-in electric vehicles where the manufactures design frequently utilizes an onboard computer that stores operational data.

“locked”, which would clearly be a requirement outside the statutory provisions of SB 1476, then the Commission must clearly say so and provide a workable process. In addition, the impacted electrical corporations must also be allowed cost recovery for the reasonable and adequately opportunity to test and assess all customer HAN devices, including the ability to require that each and every relevant HAN vendor fill-out a questionnaire, and then verify the vendor’s responses to determine if that particular device can only be used by the registered entity, or whether any foreseeable third party primary or secondary “covered entities” exist. This of course would arguably be overly burdensome and even if the utility were able to declare a HAN device as “locked”, any affected vendor must be allowed due process and an opportunity to protest the utility’s assessment and determination.

These levels of detailed analyses have not yet occurred, and there exists substantial uncertainty about the outcome and feasibility of the proposed “locked” device concept. Moreover, regardless of “locked” or unlocked, SDG&E fully anticipates, and has previously commented on the record of this proceeding, the need to provide a standard offer data interconnection agreement for customer and utility approved HAN devices. Further, the utilities future tariff provisions required under this PD should spell out the precise technical data interchange specification(s) utilized by each of the utilities (e.g., the forthcoming Smart Energy profile 2.0 protocol...); as well, the tariff must spell out any compliance measures necessary to ensure customers are made aware of the Privacy policies and/or risks associated with misuse of energy usage data, as defined by SB 1476. Accordingly, SDG&E, at this time, objects to the use of the term “locked” and recommends that the associated conditional language proposed in the PD¹⁴ be removed and Attachment D¹⁵ be modified as follows:

¹⁴ PD, at pp. 2, 32-34, 42-43, 102, 106 and Conclusions of Law 7, at p. 124.

¹⁵ Attachment D, at p. 1.

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

1. DEFINITIONS

(a) **Covered Entity.** A “covered entity” is (1) any electrical corporation;¹⁶ ~~or (2) any third party affiliated with or in a business relationship with an electrical corporation; or (3) any other third party, when authorized by the customer, that collects~~ accesses, stores, uses, or discloses covered information relating to 11 or more customers who obtains this information from an electrical corporation ~~or through the registration of a locked device that transfers information to that third party.~~¹⁷

C. Definition of “Covered Information”

The PD¹⁸ and Attachment D¹⁹ both further adopt the following proposed definition of “Covered information”.

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

1. DEFINITIONS

(c) **Covered Information.** “Covered information” is any usage information obtained through the use of the capabilities of Advanced Metering Infrastructure when associated with any information that can reasonably be used to identify a customer, except that covered information does not include usage information from which identifying information has been removed such that a customer cannot reasonably be identified or re-identified. Covered information, however, does not include information provided to the Commission pursuant to its oversight responsibilities.

SDG&E states that the use of the word “reasonably” within subsection 1(c) to define the term “Covered information” is unconstitutionally ambiguous or vague. The overall result of

¹⁶ At this time “any electrical corporation” includes only PG&E, SCE, and SDG&E. Phase 2 of this proceeding will determine whether these rules should apply to gas corporations and other electrical corporations.

¹⁷ The Commission and its agents, including but not limited to contractors and consultants, are not “covered entities” subject to these rules because the Commission and its agents are subject to separate statutory provisions pertaining to data. In addition, these rules do not apply at this time to gas corporations, other electrical corporations, community choice aggregators, or electric service providers. Phase 2 of this proceeding will make that determination.

¹⁸ PD, at p. 44.

¹⁹ Attachment D, at p. 1.

defining “Covered information” in this open-ended manner conflicts with the express language of Public Utilities Code § 8380(a), which defines a customer’s electrical consumption data as any usage information which is made available as part of an advanced metering infrastructure, “and includes the name, account number, or residence of the customer.”²⁰ Specifically, Public Utilities Code § 8380(a) provides that:

(a) For purposes of this section, “electrical or gas consumption data” means data about a customer’s electrical or natural gas usage that is made available as part of an advanced metering infrastructure, and includes the name, account number, or residence of the customer.

The most obvious difference between the statutory language and that adopted in the PD is the example of the overall vague definitional terminology introduced by the word *reasonable*. It introduces an objective standard into the policy or protocol. Likewise, the term *reasonable* smoothens discretionary power or the effect of the readily identifiable statutory obligations provided by the Legislature in SB 1476.

Where the precise statutory language intentionally compromises on the exercise of discretionary power, it requires strict compliance in that a party is clearly able to explain its performance (or lack of expected performance) relative to a release of a customer’s consumption data (means electrical usage information) if it includes the name, account number, or residence of the customer. In opposite, the PD’s adoption of the word *reasonable* affects the harshness of an imprecise compliance, which introduces differing views of common sense and open interpretation of what may normally be expected from a party’s performance. Further, it could, for example, embolden litigious malcontents to challenge the privacy and security rules adopted by this Commission. Accordingly, SDG&E urges the Commission to appropriately define the word “Covered information” as follows:

²⁰ Public Utilities Code § 8380(a).

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

1. DEFINITIONS

(c) **Covered Information.** “Covered information” is any data about a customer’s electrical usage information obtained through the use of the capabilities of Advanced Metering Infrastructure when associated with any information that can reasonably be used to identify a customer, except that covered information does not include usage information from which identifying information has been removed such that a customer cannot reasonably be identified or re-identified. Covered information, however, does not include information provided to the Commission pursuant to its oversight responsibilities. that is made available as part of an advanced metering infrastructure, and includes the name, account number, or residence of the customer.

D. Definition of “Primary Purpose”

SDG&E recognizes the PD appropriately distinguish the differences between which uses of information are “Primary” and “Secondary” purposes;²¹ however, the language provided within Attachment D, subsection 1(d)(2) used to define the term “primary purposes” inadvertently narrows “Primary” by replacing the statutory language of Public Utilities Code § 8380(e)(2), which provides:

(2) Nothing in this section shall preclude an electrical corporation or gas corporation from disclosing a customer’s electrical or gas consumption data to a third party for system, grid, or operational needs, or the implementation of demand response, energy management, or energy efficiency programs, provided that, for contracts entered into after January 1, 2011, the utility has required by contract that the third party implement and maintain reasonable security procedures and practices appropriate to the nature of the information, to protect the personal information from unauthorized access, destruction, use, modification, or disclosure, and prohibits the use of the data for a secondary commercial purpose not related to the primary purpose of the contract without the customer’s consent. [Emphasis added].

SDG&E believes this change is significant as it would arguably restrict an electrical corporation from using “Covered information” for other operational needs which are not “needs

²¹ PD, at pp. 36-40.

of the electrical system or grid.” In view of this risk, SDG&E urges the Commission to revise Attachment D, subsection 1(d)(2) to more accurately reflect the specific statutory language provided by the Legislature through the enactment of SB 1476. Specifically, SDG&E proposes the following revisions:

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

1. DEFINITIONS

(d) **Primary Purposes.** The “primary purposes” for the collection, storage, use or disclosure of covered information are to —

(1) provide or bill for electrical power;⁵

(2) provide for system, grid, or operational needs; ~~fulfill other operational needs of the electrical system or grid,~~

(3) provide services as required by state or federal law or specifically authorized by an order of the Commission;⁵ or

(4) plan, implement, or evaluate demand response, energy management, or energy efficiency programs operated by, or on behalf of and under contract with, an electrical corporation.

E. What Access to Usage Data Should Utilities Provide and When Should they Provide it?

SDG&E wishes to clarify certain statements and issues in the PD regarding the implementation costs associated with SDG&E’s Customer Energy Network (CEN) service²² and Google’s PowerMeter, which process funding figures and history are erroneously used to suggest that “[t]he necessity of an application, as SCE requests, to consider the recovery of costs for third-party access is not clear.” In particular, the PD states the following:

²² SDG&E Advice Letter 2100-E, effective September 1, 2009, was submitted to the Commission on July 31, 2009, to request approval for a process whereby “SDG&E can allow its customers to electronically consent to send their metered interval data to a SDG&E-authorized 3rd party provider by using SDG&E’s Customer Energy Network (CEN) service.”

“SDG&E gained Commission authorization for providing information to third parties through a Tier 2 advice letter that was only three pages in length (plus tariff sheets). Moreover, concerning implementation costs, SDG&E’s advice letter states, ‘[i]mplementation costs are estimated between \$650,000 and \$750,000, funded through current AMI contingency funding and energy efficiency education and outreach funding’.”²³

The above quotation from Advice Letter 2100-E, dated July 31, 2009, only pertains to implementation costs of the CEN data transfer process to Google’s PowerMeter and not to the incremental costs required to implement OpenADE / NAESB ESPI standards and protocols for broader data access, including customer usage data, retail and wholesale prices and other information to third parties. SDG&E has estimated in its TY 2012 GRC that an additional \$1.6 million of direct capital cost are required to develop the OpenADE / NAESB ESPI interfaces for third party accessibility.²⁴

F. Limitations on the Use and Disclosure of a Customer’s Unencrypted Electrical Consumption Data

In addition to the clarification of terms described above, SDG&E also recommends limited revisions to the PD regarding the “Use and Disclosure Limitation” portion of Attachment D to avoid any possible ambiguity regarding the “chain of responsibility” approach and its application for protecting privacy and enforcing the policy rules, contained in Attachment D, subsection 6(c)(3). The PD describes the “chain of responsibility” as “a concept widely accepted in the commercial sphere: a contractual chain of downstream responsibility, in which the party at the top of the stream has the right to insist that its next immediate downstream partner abides by privacy rules ... and so on.”²⁵ [Emphasis added]. The PD further goes on to explain that under the adopted “chain of responsibility” approach “[e]lectric utilities are already responsible for the protection of customer privacy whenever they use a third party to perform utility operations. The

²³ PD, at pp. 101-102.

²⁴ Direct capital cost will not include loaders, such as pension, benefits, payroll taxes and other cost.

²⁵ PD, at p. 68.

“chain of responsibility” currently works in these contractual relationships. It currently provides a reasonable approach to the protection of customer privacy and it can continue to do so.”²⁶

[Emphasis added].

Consequently, while SDG&E recognizes that section 6 is intended to provide the contextual outer limitations placed on the use and disclosure of the information that the program seeks to protect under the rules that this decision adopts (as opposed to creating a new “chain of downstream liability” for the security of that data, or its use or misuse by customer authorized third parties).²⁷ It is because SDG&E also understands that parties may disagree as to the specific intent of the Commission expressed by subsection 6(c) rules governing “Disclosures to Third Parties”, and whether they apply only to PG&E, SCE, and SDG&E, and the companies that assist them under contract for “primary purpose” utility functions,²⁸ that SDG&E comments the language and vocabulary in this section warrants the Commission’s close evaluation of potential vagueness or ambiguity, which may cause some unintended effects. Appropriately, SDG&E advocates that the language of subsection 6(c), being at the heart of the privacy program,²⁹ requires further clarification and curtailment to remove any perceived ambiguity that the aforementioned electric utilities’ “chain of responsibility” only applies to those third party covered entities that the utility has an affiliation with, or other contractual business relationship with,³⁰ and not to any customer authorized third parties that do not have a direct contractual relationship for a primary purpose with the utility.

²⁶ PD, at p. 71.

²⁷ SDG&E is also concerned that the lack of clarity may give rise to other interpretations of section 6, which may suggest the Commission is mandating secondary disclosures must be allowed by any entity that receives covered information derived initially from a covered entity regardless of whether it is reasonably necessary to the initial purpose being carried out, or otherwise disallowed under contract with the electrical corporation.

²⁸ PD, at p. 2; *see also* Finding of Fact 24, at p. 109, Finding of Fact 42, at p. 114, and Finding of Fact 56, at p. 119.

²⁹ PD, at p. 65.

³⁰ *See* Conclusion of Law 15, at p. 126, which provides that a utility may impose restrictions on firms with which it contracts.

Besides, as previously mentioned supra, this liability limitation is furthermore an express statutory requirement ordered by Senate Bill 1476 (added to Division 4.1 of the Public Utilities Code as § 8380(f) and § 8381(f)) and is more consistent with other sections of the Public Utilities Code, including those identified in Attachment B, and the past Commission policies as articulated in the PD that impart the necessary basis for adopting the “chain of responsibility” contractual relationships.³¹ Above all, Public Utilities Code § 8380(f) and § 8381(f) provide that:

(f) If a customer chooses to disclose his or her electrical or gas consumption data to a third party that is unaffiliated with, and has no other business relationship with, the electrical or gas corporation, the electrical or gas corporation shall not be responsible for the security of that data, or its use or misuse. [Emphasis added].

However, if the Commission’s objective in drafting Attachment D, sections 1 and 6 is to have PG&E, SCE and SDG&E monitor, assess and enforce the proposed adopted privacy and security rules with unaffiliated customer authorized third parties that are “covered entities” as defined in Attachment D, Section 1, then the Commission is most certainly embarking on a tenuous legal path. Specifically, though the proposed tariffs that will define future utility transfers of “covered information” to a customer’s authorized third party presumably must include requirements of the third party to adhere to specific technical data transfer protocols and standards (e.g., OpenADE / NAESB ESPI and SEP), beyond those expected technical standard parameters, a utility is not in a technical or legal position to adequately monitor and assess whether a customer authorized third party is complying with the proposed privacy and security rules as adopted in this PD. Moreover, any process for ceasing the disclosure based on mere accusations or a perceived wrong doing or violation of the privacy and security rules must encompass adequate “due process” under the Commission’s jurisdiction, otherwise, customers

³¹ PD, at p. 71.

and third parties can assert harm and damages caused by the utility's alleged intentional tortious interference with contractual or other business relations.

Furthermore, in reviewing the recommended customer authorization requirement for disclosures for "secondary purposes" contained in subsection 6(d), SDG&E also urges the Commission to revise the proposed language in this section to allow customers to provide their authorization written or electronically.³² In accordance with the above discussion, SDG&E respectfully proposes the following minimum revisions to section 6:

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

6. USE AND DISCLOSURE LIMITATION

(a) **Generally.** Covered information shall be used solely for the purposes specified by the covered entity in accordance with section 3.

(b) **Primary Purposes.** An electrical corporation may collect, store and use covered information for primary purposes without customer consent. Other covered entities may access collect, store and use covered information only with prior customer consent, except as otherwise provided here.

(c) **Disclosures to Third Parties.**

(1) **Initial Disclosure by a Covered Entity.** A covered entity may disclose covered information to a third party without customer consent when explicitly ordered to do so by the Commission or for a primary purpose being carried out under contract with and on behalf of the electrical corporation ~~entity disclosing the data~~, provided that the covered entity disclosing the data shall, by contract, require the third party to agree to collect, store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the covered entity itself operates as required under this rule and, if the information is being disclosed for demand response, energy management or energy efficiency purposes, the disclosing entity permits customers to opt out of such disclosure consistent with applicable program terms and conditions, unless otherwise directed by the Commission.

³² See PD, at p. 47 discussing the importance of electronic transactions; see also Finding of Fact 16, at p. 107.

(2) **Subsequent Disclosures.** Any covered entity that receives covered information derived initially from an electrical corporation ~~covered entity~~ may disclose such covered information to another entity without customer consent for a primary purpose, provided that the covered entity disclosing the covered information shall, by contract, require the entity receiving the covered information to use the covered information only for such primary purpose and to agree to store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates as required by this rule. Nothing in this section shall preclude an electrical corporation from restricting under contract any entity from disclosing such covered information to another entity without the electrical corporation's express authorization and consent.

(3) **Terminating Disclosures to Entities Failing to Comply With Their Privacy Assurances.** When a covered entity discloses covered information to a third party under this subsection 6(c), it shall specify by contract that it shall be considered a material breach if the third party engages in a pattern or practice of storing, using or disclosing the covered information in violation of the third party's contractual obligations to handle the covered information under policies no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates in compliance with this rule. If a covered entity disclosing covered information finds that a third party to which it disclosed covered information is engaged in a pattern or practice of storing, using or disclosing covered information in violation of the third party's contractual obligations related to handling covered information, the disclosing entity shall promptly cease disclosing covered information to such third party. Nothing in this section shall be construed to impose any liability on an electrical corporation if a customer chooses to disclose his or her electrical or gas consumption data to a third party entity that is unaffiliated with, and has no other business relationship with, the electrical corporation, the electrical corporation shall not be responsible for the security of that data, or its use or misuse.

(d) **Secondary Purposes.** No covered entity shall use or disclose covered information for any secondary purpose without obtaining the customer's prior, express, written or electronic authorization for each such purpose. This authorization is not required when information is—

- (1) provided pursuant to a legal process as described in 4(c) above;
- (2) provided in situations of imminent threat to life or property as described in 4(d) above; or

APPENDIX OF PROPOSED FINDINGS AND CONCLUSIONS

Findings of Fact

7. It is reasonable to exempt from the privacy and security requirements in this decision third parties ~~obtaining information~~ who upon the consent of the customer receive consumer electrical consumption information on the usage of ten or less households because failure to do so would complicate situations where a family member or friend takes care of the affairs of a small number of other people.

9. It is reasonable to require third parties who receive consumer usage information from the electric corporation via the internet (“back-haul”) or from the Smart Meter through a “~~locked~~” HAN-enabled device that transmits usage data to the third party to comply with the privacy and security requirements adopted in this decision.

12. It is reasonable to define as “covered information” any electrical usage information obtained through the use of the capabilities of Advanced Metering Infrastructure when associated with the name, account number, or residence of the customer ~~any information that can reasonably be used to identify a customer, except that covered information does not include usage information from which identifying information has been removed such that a customer cannot reasonably be identified or re-identified.~~

14. It is reasonable to define as “primary purposes” information that is used to:

(1) provide or bill for electrical power,

(2) provide for system, grid, or operational needs; ~~fulfill other operational needs of the electrical system or grid,~~

(3) provide services as required by state or federal law or specifically authorized by an order of the Commission, or

(4) implement demand response, energy management, or energy efficiency programs operated by, or on behalf of and under contract with, an electrical or gas corporation, electric service provider, or community choice aggregator.

41. It is reasonable to permit other covered entities to access ~~collect~~, store and use covered information when they have the prior consent of a customer, on the condition that they follow the restrictions found reasonable in Finding of Fact 51.

51. It is reasonable to adopt the following rules that apply to covered entities to limit the use and disclosure of consumer usage information:

6. USE AND DISCLOSURE LIMITATION

(a) **Generally.** Covered information shall be used solely for the purposes specified by the covered entity in accordance with section 3.

(b) **Primary Purposes.** An electrical corporation may collect, store and use covered information for primary purposes without customer consent. Other covered entities may access ~~collect~~, store and use covered information only with prior customer consent, except as otherwise provided here.

(c) **Disclosures to Third Parties.**

(1) **Initial Disclosure by a Covered Entity.** A covered entity may disclose covered information to a third party without customer consent when explicitly ordered to do so by the Commission or for a primary purpose being carried out under contract with and on behalf of the electrical corporation ~~entity disclosing the data~~, provided that the covered entity disclosing the data shall, by contract, require the third party to agree to collect, store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the covered entity itself operates as required under this rule and, if the information is being disclosed for demand response, energy management or energy efficiency purposes, the disclosing entity permits customers to opt out of such disclosure consistent with applicable program terms and conditions, unless otherwise directed by the Commission.

(2) **Subsequent Disclosures.** Any covered entity that receives covered information derived initially from an electrical corporation ~~covered entity~~ may disclose such covered information to another entity without customer consent for a primary purpose, provided that the covered entity disclosing the covered information shall, by contract, require the entity receiving the covered information to use the covered information only for such primary purpose and to agree to store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates as required by this rule. Nothing in this section shall preclude an electrical corporation from restricting under contract any entity from disclosing such covered information to another entity without the electrical corporation's express authorization and consent.

(3) Terminating Disclosures to Entities Failing to Comply With Their Privacy Assurances. When a covered entity discloses covered information to a third party under this subsection 6(c), it shall specify by contract that it shall be considered a material breach if the third party engages in a pattern or practice of storing, using or disclosing the covered information in violation of the third party's contractual obligations to handle the covered information under policies no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates in compliance with this rule. If a covered entity disclosing covered information finds that a third party to which it disclosed covered information is engaged in a pattern or practice of storing, using or disclosing covered information in violation of the third party's contractual obligations related to handling covered information, the disclosing entity shall promptly cease disclosing covered information to such third party.

Nothing in this section shall be construed to impose any liability on an electrical corporation if a customer chooses to disclose his or her electrical or gas consumption data to a third party entity that is unaffiliated with, and has no other business relationship with, the electrical corporation, the electrical corporation shall not be responsible for the security of that data, or its use or misuse.

(d) Secondary Purposes. No covered entity shall use or disclose covered information for any secondary purpose without obtaining the customer's prior, express, written or electronic authorization for each such purpose. This authorization is not required when information is—

- (1) provided pursuant to a legal process as described in 4(c) above;
- (2) provided in situations of imminent threat to life or property as described in 4(d) above; or
- (3) authorized by the Commission pursuant to its jurisdiction and control.

(e) Customer Authorization.

- (1) **Authorization.** Separate authorization by each customer must be obtained for each secondary purpose.
- (2) **Revocation.** Customers have the right to revoke, at any time, any previously granted authorization. Non-residential customers shall have the same right to revoke, unless specified otherwise in a contract of finite duration.
- (3) **Opportunity to Revoke.** The consent of a residential

customer shall continue without expiration, but an entity receiving information pursuant to a residential customer's authorization shall contact the customer, at least annually, to inform the customer of the authorization granted and to provide an opportunity for revocation. The consent of a non-residential customer shall continue in the same way, unless specified otherwise in a contract of finite duration, but an entity receiving information pursuant to a non-residential customer's authorization shall contact the customer, to inform the customer of the authorization granted and to provide an opportunity for revocation either upon the termination of the contract, or annually if there is no contract.-

(f) **Parity.** Covered entities shall permit customers to cancel authorization for any secondary purpose of their covered information by the same mechanism initially used to grant authorization.

(g) **Availability of Aggregated Usage Data.** Covered entities shall permit the use of aggregated usage data that is removed of all personally-identifiable information to be used for analysis, reporting or program management provided that the release of that data does not disclose or reveal specific customer information because of the size of the group, rate classification, or nature of the information.

Conclusions of Law

7. In situations where a HAN-enabled device is registered ~~“locked”~~ to a third party and automatically forwards customer usage data to that third party ~~and no other~~, it is consistent with California law and policy to require a condition for access to the Smart Meter that the customer agrees to the data transfer and to the third party's proposed uses of the data and that the third party demonstrate compliance with Commission requirements for protecting customer data and customer privacy.

25. The following limitations on the use and disclosure of customer usage data are consistent with SB 1476 and the Pub. Util. Code:

6. USE AND DISCLOSURE LIMITATION

(a) **Generally.** Covered information shall be used solely for the purposes specified by the covered entity in accordance with section 3.

(b) **Primary Purposes.** An electrical corporation may collect, store and use covered information for primary purposes without customer consent. Other covered entities may access ~~collect~~, store and use covered information only with prior customer consent, except as otherwise provided here.

(c) Disclosures to Third Parties.

(1) Initial Disclosure by a Covered Entity. A covered entity may disclose covered information to a third party without customer consent when explicitly ordered to do so by the Commission or for a primary purpose being carried out under contract with and on behalf of the electrical corporation ~~entity disclosing the data~~, provided that the covered entity disclosing the data shall, by contract, require the third party to agree to collect, store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the covered entity itself operates as required under this rule and, if the information is being disclosed for demand response, energy management or energy efficiency purposes, the disclosing entity permits customers to opt out of such disclosure consistent with applicable program terms and conditions, unless otherwise directed by the Commission.

(2) Subsequent Disclosures. Any covered entity that receives covered information derived initially from an electrical corporation ~~covered entity~~ may disclose such covered information to another entity without customer consent for a primary purpose, provided that the covered entity disclosing the covered information shall, by contract, require the entity receiving the covered information to use the covered information only for such primary purpose and to agree to store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates as required by this rule. Nothing in this section shall preclude an electrical corporation from restricting under contract any entity from disclosing such covered information to another entity without the electrical corporation's express authorization and consent.

(3) Terminating Disclosures to Entities Failing to Comply With Their Privacy Assurances. When a covered entity discloses covered information to a third party under this subsection 6(c), it shall specify by contract that it shall be considered a material breach if the third party engages in a pattern or practice of storing, using or disclosing the covered information in violation of the third party's contractual obligations to handle the covered information under policies no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates in compliance with this rule. If a covered entity disclosing covered information finds that a third party to which it disclosed covered information is engaged in a pattern or practice of storing, using or disclosing covered information in violation of the third party's contractual obligations related to handling covered

information, the disclosing entity shall promptly cease disclosing covered information to such third party.

Nothing in this section shall be construed to impose any liability on an electrical corporation if a customer chooses to disclose his or her electrical or gas consumption data to a third party entity that is unaffiliated with, and has no other business relationship with, the electrical corporation, the electrical corporation shall not be responsible for the security of that data, or its use or misuse.

(d) Secondary Purposes. No covered entity shall use or disclose covered information for any secondary purpose without obtaining the customer's prior, express, written or electronic authorization for each such purpose. This authorization is not required when information is—

(1) provided pursuant to a legal process as described in 4(c) above;

(2) provided in situations of imminent threat to life or property as described in 4(d) above; or

(3) authorized by the Commission pursuant to its jurisdiction and control.

(e) Customer Authorization.

(1) **Authorization.** Separate authorization by each customer must be obtained for each secondary purpose.

(2) **Revocation.** Customers have the right to revoke, at any time, any previously granted authorization. Non-residential customers shall have the same right to revoke, unless specified otherwise in a contract of finite duration.

(3) **Opportunity to Revoke.** The consent of a residential customer shall continue without expiration, but an entity receiving information pursuant to a residential customer's authorization shall contact the customer, at least annually, to inform the customer of the authorization granted and to provide an opportunity for revocation. The consent of a non-residential customer shall continue in the same way, unless specified otherwise in a contract of finite duration, but an entity receiving information pursuant to a non-residential customer's authorization shall contact the customer, to inform the customer of the authorization granted and to provide an opportunity for revocation either upon the termination of the contract, or annually if there is no contract.-

(f) **Parity.** Covered entities shall permit customers to cancel authorization for any secondary purpose of their covered information by the same mechanism initially used to grant authorization.

(g) **Availability of Aggregated Usage Data.** Covered entities shall permit the use of aggregated usage data that is removed of all personally-identifiable information to be used for analysis, reporting or program management provided that the release of that data does not disclose or reveal specific customer information because of the size of the group, rate classification, or nature of the information.

Attachments

Attachment D:

Rules Regarding Privacy and Security Protections for Energy Usage Data

1. DEFINITIONS

(a) **Covered Entity.** A “covered entity” is (1) any electrical corporation;³³ ~~or (2) any third party affiliated with or in a business relationship with an electrical corporation; or (3) any other third party, when authorized by the customer, that collects, accesses, stores, uses, or discloses covered information relating to 11 or more customers who obtains this information from an electrical corporation or through the registration of a locked device that transfers information to that third party.~~³⁴

(b) **Customer.** For purposes of this rule, a “customer” is any entity receiving retail generation, distribution or transmission service from an electrical corporation.

(c) **Covered Information.** “Covered information” is any data about a customer’s electrical usage information obtained through the use of the capabilities of Advanced Metering Infrastructure when associated with any information that can reasonably be used to identify a customer, except that covered information does not include usage information from which identifying information has been removed such that a customer cannot reasonably be identified or re-identified. Covered information, however, does not include information provided to the Commission pursuant to its oversight responsibilities that is made available as part of an advanced metering infrastructure, and includes the name, account number, or residence of the customer.

³³ At this time “any electrical corporation” includes only PG&E, SCE, and SDG&E. Phase 2 of this proceeding will determine whether these rules should apply to gas corporations and other electrical corporations.

³⁴ The Commission and its agents, including but not limited to contractors and consultants, are not “covered entities” subject to these rules because the Commission and its agents are subject to separate statutory provisions pertaining to data. In addition, these rules do not apply at this time to gas corporations, other electrical corporations, community choice aggregators, or electric service providers. Phase 2 of this proceeding will make that determination.

(d) **Primary Purposes.** The “primary purposes” for the collection, storage, use or disclosure of covered information are to —

(1) provide or bill for electrical power;

(2) provide for system, grid, or operational needs; ~~fulfill other operational needs of the electrical system or grid,~~

(3) provide services as required by state or federal law or specifically authorized by an order of the Commission; or

(4) plan, implement, or evaluate demand response, energy management, or energy efficiency programs operated by, or on behalf of and under contract with, an electrical corporation.

6. USE AND DISCLOSURE LIMITATION

(a) **Generally.** Covered information shall be used solely for the purposes specified by the covered entity in accordance with section 3.

(b) **Primary Purposes.** An electrical corporation may collect, store and use covered information for primary purposes without customer consent. Other covered entities may access ~~collect~~, store and use covered information only with prior customer consent, except as otherwise provided here.

(c) **Disclosures to Third Parties.**

(1) **Initial Disclosure by a Covered Entity.** A covered entity may disclose covered information to a third party without customer consent when explicitly ordered to do so by the Commission or for a primary purpose being carried out under contract with and on behalf of the electrical corporation ~~entity disclosing the data~~, provided that the covered entity disclosing the data shall, by contract, require the third party to agree to collect, store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the covered entity itself operates as required under this rule and, if the information is being disclosed for demand response, energy management or energy efficiency purposes, the disclosing entity permits customers to opt out of such disclosure consistent with applicable program terms and conditions, unless otherwise directed by the Commission.

(2) **Subsequent Disclosures.** Any covered entity that receives covered information derived initially from an electrical corporation ~~covered entity~~ may disclose such covered information to another entity without customer consent for a primary purpose, provided that the covered entity disclosing

the covered information shall, by contract, require the entity receiving the covered information to use the covered information only for such primary purpose and to agree to store, use, and disclose the covered information under policies, practices and notification requirements no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates as required by this rule. Nothing in this section shall preclude an electrical corporation from restricting under contract any entity from disclosing such covered information to another entity without the electrical corporation's express authorization and consent.

(3) Terminating Disclosures to Entities Failing to Comply With Their Privacy Assurances. When a covered entity discloses covered information to a third party under this subsection 6(c), it shall specify by contract that it shall be considered a material breach if the third party engages in a pattern or practice of storing, using or disclosing the covered information in violation of the third party's contractual obligations to handle the covered information under policies no less protective than those under which the electrical corporation ~~covered entity~~ from which the covered information was initially derived operates in compliance with this rule. If a covered entity disclosing covered information finds that a third party to which it disclosed covered information is engaged in a pattern or practice of storing, using or disclosing covered information in violation of the third party's contractual obligations related to handling covered information, the disclosing entity shall promptly cease disclosing covered information to such third party. Nothing in this section shall be construed to impose any liability on an electrical corporation if a customer chooses to disclose his or her electrical or gas consumption data to a third party entity that is unaffiliated with, and has no other business relationship with, the electrical corporation, the electrical corporation shall not be responsible for the security of that data, or its use or misuse.

(d) Secondary Purposes. No covered entity shall use or disclose covered information for any secondary purpose without obtaining the customer's prior, express, written or electronic authorization for each such purpose. This authorization is not required when information is—

- (1) provided pursuant to a legal process as described in 4(c) above;
- (2) provided in situations of imminent threat to life or property as described in 4(d) above; or
- (3) authorized by the Commission pursuant to its jurisdiction and control.

(e) Customer Authorization.

(1) **Authorization.** Separate authorization by each customer must be obtained for each secondary purpose.

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(3) **Opportunity to Revoke.** The consent of a residential customer shall continue without expiration, but an entity receiving information pursuant to a residential customer's authorization shall contact the customer, at least annually, to inform the customer of the authorization granted and to provide an opportunity for revocation. The consent of a non-residential customer shall continue in the same way, unless specified otherwise in a contract of finite duration, but an entity receiving information pursuant to a non-residential customer's authorization shall contact the customer, to inform the customer of the authorization granted and to provide an opportunity for revocation either upon the termination of the contract, or annually if there is no contract.-

(f) **Parity.** Covered entities shall permit customers to cancel authorization for any secondary purpose of their covered information by the same mechanism initially used to grant authorization.

(g) **Availability of Aggregated Usage Data.** Covered entities shall permit the use of aggregated usage data that is removed of all personally-identifiable information to be used for analysis, reporting or program management provided that the release of that data does not disclose or reveal specific customer information because of the size of the group, rate classification, or nature of the information.

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of the foregoing **COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) ON THE PROPOSED DECISION OF COMMISSIONER MICHAEL R. PEEVEY** on each party named in the official service list for proceeding **R.08-12-009** by electronic service, and by U.S. Mail to those parties who have not provided an electronic address.

Copies were also sent via Federal Express to Commissioner Michael R. Peevey and to Administrative Law Judge Timothy J. Sullivan.

Executed this 2nd day of June 2011 at San Diego, California.

/s/ JOEL DELLOSA
Joel Dellosa



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