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)

DEMAND RESPONSE AND SMART GRID COALITION (DRSG) COMMENTS ON 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

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In accordance with ALJ Clopton's Proposed Decision of May 6, 2011, in the above-captioned proceeding, the Demand Response and Smart Grid Coalition ("DRSG") respectfully submits these comments. DRSG begins by commending the Commission for its continued forward movement on the development and deployment of a smart grid. It continues to tackle the necessary issues in a thoughtful manner and continues to address the various needs of all stakeholders in the process.

DRSG believes that the issues being dealt with in this particular proceeding to be among the most important in the smart grid space. At this point it is commonly understood and accepted that one of the key ways that the grid can be made to be "smart" is by using the new technologies being made available to create new data and information. This new information can be used by utilities to make their planning and operations more efficient and their customers more satisfied. The information can be used by customers to allow them to better manage and control their usage and costs, including by having the information go directly to devices and systems that

accomplish those goals in an automated manner. Finally, the information can be used by third parties, including technology companies, DR providers, energy efficiency firms, and others that will directly help utilities and/or customers

Obviously, care must be taken to ensure that parameters such as privacy and security are addressed and respected. But it is important to note, however, that these should not be taken as threshold barriers to the implementation of smart grid. They were not barriers to the added-value leaps forward in other industries such as telecommunications and finance. Neither should they be in the case of smart grid

The key is to make sure that the information that is being created or can be created is accessible to all of the parties that can act on it. The nature of the electricity system is that utilities are located in the primary juncture of data creation and use. They should be encouraged to create data and use it to optimize their operations and delivery of service. But if data created is not allowed to be directly and promptly accessible to customers and their authorized third parties, and if customers and others are not allowed to create added-value information and services based on that data, the benefits of technologies like smart meters will not be delivered and the promise of the smart grid will not be realized. To achieve that promise, DSRG believes the Commission can and must facilitate the development of a level and open playing field among customers, third parties and utilities. Further, DRSG believes the Commission can do without any increase in its jurisdiction into the premise or into the operations of a third party—both of which can be found in the Proposed Decision.

DRSG offers the following comments on specific provisions in the Proposed Decision.

I. Smart Energy Profile (SEP)

The Proposed Decision appropriately notes the importance of standards to the objective of the proceeding. One of the key standards is SEP (Smart Energy Profile). The Proposed Decision further notes that adoption of an important interoperability standard, Smart Energy Profile (SEP) 2.0, has been delayed (Proposed Decision at 102 – 103).

When it comes to SEP, the key point that needs to be understood by the Commission is that as with any standards, it is important to focus on the standards "road" instead of "destination." SEP 1.0 is considered a valid standard and it is in full use in a number of different places in the U.S., including Texas, Nevada, and Oklahoma. Work on SEP 2.0 continues to take place, but it is commonly acknowledged in the standards community (in which DRSG members are active participants) that SEP 2.0 devices will not be available for at least a year and probably two years—contrary to what is alluded to in the Proposed Decision as only a few months (Proposed Decision at 97). DRSG thinks any plan that "waits" for the completion of SEP 2.0 would create an unnecessary delay in providing consumers and building operators with the ability to benefit directly from smart meters any time soon.

II. Pilot Projects

The Proposed Decision directs IOUs to conduct pilot projects related to direct access to information coming from the meter. The Proposed Decision, however, does not provide a rationale or explanation for why pilots are needed now instead of moving on with implementation of direct access as ordered in the Commission's December 2009 decision. D.09-12-046 states in relevant part:

> Southern California Edison Company, San Diego Gas & Electric Company and Pacific Gas and Electric Company shall provide to their customers with a smart meter access to usage data on a real-time or near real-time basis no later than the end of 2011 (Ordering Paragraph 4).

DRSG believes that in some cases a "testing" pilot is appropriate. Here, however, DRSG believes a pilot is unnecessary, and the Proposed Decision should order "phasing" instead of "piloting." Phasing implies that the reason for the deployment is accepted and the phasing allows the proper ramp-up. Here, the activation of the HAN interface is not only already accepted, but also already ordered by the Commission in D.09-12-046 and funded by the Commission in its approval of the smart meter rollouts by PG&E, SDG&E, and SCE.

Moreover, the technical standards available today are sufficient to enable opening up of the HAN interface. DRSG notes there is significant existing experience with providing data directly from meters, and it points in particular to examples in Texas. In Texas, any customer with a smart meter—currently over three million are installed—may request a HAN device be linked to his or her meter. DRSG proposes the same approach for California; once utilities have the necessary IT systems in place, any customer with a smart meter should be able to request a HAN device be linked to his or her meter. The utilities could impose limits on monthly connections at first to ensure their systems will not be overwhelmed, though this is unlikely given the Texas experience, where initial ramp up has been slow (as is typical of any new market).

DRSG recommends that the Commission not require utilities to conduct pilots but rather that it direct the beginning of phased implementation as described above. If the Commission

decides instead to slow the availability of HAN devices to consumers by mandating pilots, the Commission should state explicitly (1) Why pilots are required; (2) What the objectives of the pilots are; (3) What the metrics of success are; (4) What the timeline for completion of the pilots is; (5) Who is authorized to manage or participate in the pilot programs; and (6) What the timeline for rollout of the opening of the HAN interface is following successful pilot completion. In short, the Commission should require the utilities to open up the HAN interface as quickly as practicable.

III. Use of Terms "Covered Information" and "Usage"

The Proposed Decision does not clearly distinguish between the terms "covered information" and "usage." DRSG notes that usage data, in and of itself, may not necessarily be considered "covered information." As a result, DRSG recommends that the Commission clarify the distinction between "covered information" and "usage" while also reinforcing the difference in statements throughout its Final Decision.

IV. Primary vs. Secondary Purpose

DRSG disagrees with the Proposed Decision's definitions of "Primary Purposes" and "Secondary Purpose" (Proposed Decision at 44). DRSG believes these definitions do not conform to SB 1476 (Chapter 497, Statutes of 2010) and are discriminatory against third-parties providing comparable services to those provided by utilities. Under the Proposed Decision, use of the data by a demand response provider to provide not only demand response—but also energy efficiency and energy-management services—would be considered a secondary purpose. This also would be the case if the demand response provider was offering its services to a customer as part of a contract with a utility. In such a case, the use of data by the third parties

would be comparable to the use of the same data by the utility, but yet under the Proposed Decision the third party would have a "lesser" designation and would be subject to stricter rules.

DRSG believes there is no reason why utilities should be given preferential treatment in terms of access to data—especially given the abundance of after-the-meter services available today and those new and innovative offerings that are certain to come. A utility's "purpose" should not be designated superior to that of a third party providing comparable services on the customer-side of the meter. DRSG recommends that the Commission expand the definition of "Primary Purposes" to include comparable services offered by third parties.

V. Types of Data Made Available

The Proposed Decision does not specify what types of data will be made available, other than usage data. While DRSG agrees that electric usage data is important and obviously should be available, DRSG also strongly believes that access to other types of data is imperative if the goal is to enable greater availability of more services to customers by not only utilities but also competitive providers. An example is power quality, which can affect the efficiency and optimization of end-uses in a building. Most smart meters generate significant amounts of additional useful information—for example, voltage, demand, kVar, etc—and that information should be made available to both utilities and customers/third parties on a comparable basis. DRSG notes that the discussion at the Commission's October 2010 workshops focused on access to more than just usage data. Limitations to data access will create competitive disadvantages for third parties providing services comparable to those provided by utilities.

VI. Data Minimization

DRSG recommends that the Commission not apply data minimization in such a way that one entity could deny, under the guise of data minimization, another entity access to data. Denial of data access due to data minimization practices could create competitive disadvantages and could be a disincentive to the development of new products and services.

VII. HAN (Home Area Network)

DRSG strongly believes that one of the main ways that the smart grid will be put into action and its benefits realized will be to provide information to customers and their devices. This information will allow an entirely new era of energy efficiency to begin, where consumers and business owners are able to optimize their usage and operations and where energy efficiency is finally embedded in U.S. society and business.

Key to making this happen will be the enabling of smart buildings that have home area networks (HAN) that are able to be connected directly to the smart meters attached to the premise. Indeed, the issue of allowing unfettered access by HANs and other devices as well as by third parties is core to this proceeding. The facilitation of smart consumers and smart buildings must pervade any final decision made in this proceeding.

It is important to note one point when it comes to HANs and to ensure that this is reflected. While "Home" is embedded in the acronym HAN, HANs do not only occur in, nor are they applicable only to, residential buildings. It must be clarified that HAN refers to any type of smart building network or else additional descriptors must be added to cover the range of technologies and applications that do and will exist.

VIII. Tariffs

The Proposed Decision calls for the utilities to file an advice letter that includes revisions to tariffs to implement the Proposed Decision's requirements to send usage data from smart meters to devices and/or to third parties authorized by the customer (Proposed Decision at 104).

DRSG believes that it is necessary to address the mechanics of providing data to third parties and to HAN devices. But this should be done via a rule—not a tariff. Moreover, there should not be any extension of jurisdiction to third parties in this regard.

IX. Projected Month End Tiered Rate

The Proposed Decision mandates utilities to provide the "projected month end tiered rate." DRSG thinks this will be confusing to consumers, because, in the absence of further information, consumers are likely to assume that the projected month end rate is their current rate. Moreover, there may be yet another price in effect between the current price and the month end price; for example, the current day could be Tier 1 and the month end projection Tier 3. This situation would add to the confusion. To correct these problems, DRSG recommends instead that the Commission direct utilities to provide customers with information on what price is in effect each day, when their usage and bill-to-date data are updated.

X. Permitting More Timely and Granular Access

DRSG disagrees with the Proposed Decision's direction to the IOUs to make price, usage, and cost information available "at least on a daily basis…with hourly or 15-minute granularity (matching the time granularity programmed into the customer's smart meter), available by the next day." Smart grid technology already exists and is being used that provides data with finer granularity and/or with less delay. DRSG thinks the Commission should not set a

new default requirement that would be in actuality a regression from current capabilities. DRSG recommends that until the Commission establishes near real-time access that it allow and encourage, but not mandate, data that is more granular and access that is more current than 24-hours old.

XI. Jurisdiction and Covered Entities

The Proposed Decision expands Commission jurisdiction to include certain types of third parties. For example, the Proposed Decision says that all parties receiving backhaul data should be subject to Commission rules. DRSG thinks this would discourage third parties from providing consumers valuable energy management products and services. Moreover, this would contradict the idea that consumers have the right to provide consent to third parties to act as "consumer agents." In addition, DRSG notes that the Proposed Decision provides no evidence that the extensive existing privacy rules in Attachment D are insufficient to protect consumer privacy or that the contractual or tariff approach included in the rules is insufficient. As a result, DRSG recommends:

1. That the term "Covered Entities" does not include third parties that receive data via the HAN through a "locked" device. Such parties would not be in contract privity with the utility, because the data comes directly through the HAN. DRSG believes this is an unnecessary and unwarranted extension of Commission jurisdiction as well as being beyond the intent of the jurisdiction-granting statute in California.

2. The deletion of Rule 1(a), Part 2 in Attachment D:

> "(a) **Covered Entity**. A 'covered entity' is (1) any electrical corporation 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"

3. The deletion of Finding of Fact #9:

> "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."

4. The deletion of Conclusion of Law #7 and #9.

> "7. In situations where a HAN-enabled device is '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."

"9. Requiring privacy and security protections by third parties acquiring consumption data from a Smart Meter assures equal treatment with those that acquire usage data over the internet from the utility."

XII. Backhaul

The Proposed Decision directs IOUs to adopt a common approach to providing data to HAN devices (Proposed Decision at 103). DRSG recommends that the Commission create a process for developing and adopting this common approach. Specifically, the Commission should direct the IOUs to conduct a workshop, comprising the IOUs plus any other interested parties, and then prepare a workshop report with recommendations. DRSG notes that such an approach worked well for the adoption of meter data exchange protocols between utilities and competitive retailers a decade ago when retail competition was introduced.

Also, DRSG recommends that the Commission apply the same principle to sending "backhauled" usage data to third parties, again via a common approach.

XIII. "Unlocked" Devices

The Proposed Decision introduces, for the first time in this proceeding, the terminology of "locked" device. DRSG thinks the Commission's definition of a "locked" device is not fully clear and could be subject to different interpretation. Further, DRSG notes that the definition of "locked" necessitates a definition for an "unlocked" device. DRSG recommends that the Commission clarify its definition of a "locked" device to mean one that is owned by a third party. At the same time, the Commission should define an "unlocked" device as one owned by a customer. The Commission should continue to state that customers should have unfettered access

to data from their “unlocked” devices and that they should have the right to share that data with whomever they choose through their "unlocked" devices.

XIV. Opt Out

DRSG recommends that the Commission should not allow a customer to opt out when a utility or covered entity is disclosing data to a third party under contract to do demand response, energy management or energy efficiency. Allowing such opt-outs would hamper the ability to pursue state policies. It also would ensure competitive disadvantages. By permitting opt-outs, the Commission would create an environment more favorable to utilities conducting energy management with internal resources than to utilities using the expertise and innovation of third parties.

In addition, DRSG notes that SB 1476 (Sec 8380(e)(2)) shows a clear intent to facilitate the provision of energy data to third parties for energy management.

As a result, DRSG recommends that the Commission delete the following passage from Rule 6(c)(1), which appears in Finding of Fact #51, Conclusions of Law #25, and Attachment D:

> 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.

XV. Consideration of National Standards

The Proposed Decision states that, "the Commission will consider via a regulatory proceeding whether to require California utilities to conform with these national standards when adopted" (Proposed Decision at footnote 76). DRSG notes that the Commission already has a policy on interoperability standards, e.g., the Proposed Decision states that "interoperability… is a central tenet of this Commission" (Footnote 179). DRSG believes that any "overhang" of potential standards that may be mandated will chill progress in implementation of the smart grid and development of the market. If the Commission does decide to implement a regulatory proceeding in this area, at a minimum, it should clarify that all currently installed technology would be grandfathered.

DRSG's position is that standards should be voluntary and that the utilities are in the best position to determine exactly which standards to implement and where. Otherwise, regulators would be selecting technology, and the market is a much better vehicle for selecting technology. As the Commission stated in D.97-05-039, "it has been proven time and time again that as technology deploys itself further and further, deeper and deeper into markets, it always improves along the way." Inserting a regulatory step to determine and mandate standards would necessarily slow the availability of new and improved technology.

Importantly, standards development is not a process with a definitive end point but rather one that is ongoing and evolutionary. Similarly, the development of the smart grid also will be an ongoing process and not something that can be subject to "point-in-time" decisions and rulings. A Commission proceeding on standards could create stranded investments by placing new costly requirements on smart grid devices and technologies already deployed.

DRSG recommends the Commission should modify footnote 76 on page 34 of the Proposed Decision, which calls for a regulatory proceeding on the question of adopting national standards, as follows:

> There is a national effort to adopt standards for data exchange with the utility (a process called OpenADE – Open Automatic Data Exchange) and with the Smart Meter (a process called Smart Energy Profile) that will provide standardized and secure information. The Commission encourages the California utilities to consider and, if appropriate and reasonable, to follow these national standards when adopted.

XVI. PAP 10 Data Model

In an additional observation and comment on standards, DRSG notes the existence of the PAP 10 data model, which has been approved through the NIST SGIP (Smart Grid Interoperability Panel) process for third-party interface. DRSG believes that PAP 10 should be noted in the final decision as an example of an available standard, but that this standard—as well as any other standard—should not be mandated by the Commission. Utilities should be able to choose to use it as appropriate.

XVII. Conclusion

The DRSG appreciates the opportunity to comment.

Respectfully submitted this 2nd day of June, 2011,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of DEMAND RESPONSE AND SMART GRID COALITION (DRSG) COMMENTS ON 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 on all parties identified on the attached official service list for Proceeding: R08-12-009. Service was completed by serving an electronic copy on their email address of record, and by mailing paper copies to parties without email addresses.

Executed on June 2, 2011 at Washington, D.C.

/s/ *Dan Delurey*

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