



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 THE CONSUMER FEDERATION OF CALIFORNIA ON THE
PROPOSED DECISION OF COMMISSIONER CHONG
"ADOPTING POLICIES AND FINDINGS PURSUANT TO THE SMART GRID POLICIES
ESTABLISHED BY THE ENERGY INFORMATION AND SECURITY ACT OF 2007"**

Commissioner Chong, the Assigned Commissioner, issued on November 17, 2009, a Proposed Decision determining what additional policies and findings should be adopted by the California Public Utilities Commission (Commission) to fulfill the regulatory obligations imposed on states by amendments to the Public Utilities Regulatory Policies Act, adopted in the Energy Information and Security Act of 2007 (EISA).

The Consumer Federation of California agrees with Commissioner Chong's determination that the Commission should not adopt the following policies:

RATEMAKING: 16 U.S.C. § 2621(d)(18)

(B) Rate recovery (Authorizing a utility to recover from customers "any capital, operating expenditure, or other costs of the electric utility" spent on the smart grid prior to the date the investment is found prudent and used and useful to ratepayers).

The Commission should affirm the Assigned Commissioner's determination that there is "no need for the Commission to adopt this provision for Smart Grid investments," but revise the justification. While "this reasonable ratemaking treatment already applies to all utility investments,"¹ it applies only if a utility proves that the expenditure meets statutory standards, e.g., is reasonable.

(C) Obsolete equipment. (Permitting timely recovery of the remaining book-value costs of any equipment rendered obsolete by the deployment of the qualified Smart Grid system, based on the remaining depreciable life of the obsolete equipment.)

The Commission should adopt the Assigned Commissioner's conclusion that consideration of specific rate treatment for obsolete equipment should be deferred to general rate cases.

¹ Proposed decision at 34.

INFORMATION: 16 U.S.C. § 2621(d)(19)

(A) Standard/ (B) Information (Requiring utilities to provide customers, on a daily basis, time-based wholesale and retail prices, the number of kWhs they purchased, and a projection of that data on the following day, and to provide customers, on an annual basis, information concerning the source of power (generation & its associated greenhouse gas emissions) delivered to the customer.

The Commission should adopt a limited version of the Assigned Commissioner’s proposed finding that “prior Commission actions on implementing information disclosure policies in the context of the utilities’ advanced metering initiatives constitute a ‘prior state action’.”²

In R.02-06-001, the Commission considered a standard similar to the EISA standard, and determined it would require “collection of usage data at a level of detail (interval data) that supports customer understanding of hourly usage patterns and how these usage patterns relate to energy costs,” and “customer access to personal energy usage data with sufficient flexibility to ensure that changes in customer preference of access frequency do not result in additional AMI system hardware costs.” CFC agrees with the Assigned Commissioner that “there is more work that we should do in this proceeding,”³ in particular, the development of certain privacy and security standards to protect the customer’s information from unwanted intruders, before adopting any requirement akin to EISA.

(C) Access. (Opening access to customer information, through the Internet and on other means of communication elected by that utility for Smart Grid applications, to both the customer and other interested persons).

The Commission should adopt the Assigned Commissioner’s determination that there are significant concerns that the Commission must address as it relates to access, particularly by third parties, such as confidentiality, the security of the customer’s information, and processes to allow for third parties to obtain access to the data with a customer’s permission, before customer information is made available to others.⁴

² Proposed Decision at 50.

³ Proposed Decision at 52

⁴ See,

PLANNING: 16 U.S.C. § 2621(d)(18)(A)

CFC asks the Commission to consider adopting the fifth EISA/PURPA standard required by EISA, which was rejected by the Assigned Commissioner:

Each State shall consider requiring that, prior to undertaking investments in nonadvanced grid technologies, an electric utility of the State demonstrate to the State that the electric utility considered an investment in a qualified smart grid system based on appropriate factors, including--

- (i) total costs;
- (ii) cost-effectiveness;
- (iii) improved reliability;
- (iv) security;
- (v) system performance; and
- (vi) societal benefit.

Wal-Mart best explained the need for such a requirement:

There should be a smart process in place for any smart grid expenditures. As with any new investment, cost consideration should be a major point of concern, as those costs will inevitably lead back to the customer. In addition to cost considerations, reasonableness and prudence should be exercised before allowing investment and implementation of any smart grid technology. It makes little sense to make smart grid changes simply because we can. There needs to be a definitive and precise process in place to ensure that the customer will ultimately benefit from the change.⁵

The Utility Reform Network (“TURN”) also advised that “[s]uch an alternatives analysis, which generally involves a consideration of cost effectiveness, should be standard business practice for evaluating the prudence of major capital investments.”⁶ SDG&E agreed, stating “smart grid investment decisions should be made a part of every utility’s normal investment planning process.”⁷ The Division of Ratepayer Advocates (“DRA”) and the Center for Energy Efficiency and Renewable Technologies (“CEERT”) appear to agree that there must be some examination by the Commission of utility smart grid investments to ensure the utilities’ decisions are consistent with state policy goals.⁸

The standard was rejected by the Assigned Commissioner because its adoption would “impose a regulatory hurdle that can slow infrastructure investment and modernization,” and would make rates ‘inequitable’.⁹ Further, the Assigned Commissioner found, EISA standard was very different from the standard in SB 17, which “would require that the smart grid improve overall efficiency, reliability, and

⁵ Wal-Mart & Sam’s Club Comments (Oct. 26, 2009) at 1.

⁶ TURN Opening Comments (Oct. 26, 2009) at 4.

⁷ SDG&E Comments on OIR (Feb. 9, 2009) at 6.

⁸ DRA Comments at 4; CEERT Comments at 4.

⁹ Proposed Decision at 26, *citing*, 16 U.S.C. § 2611.

cost-effectiveness of electrical system operations, planning, and maintenance.”¹⁰ “SB 17 requires that the Commission adopt policies that guide investments in a Smart Grid, while the EISA requirement, if adopted, would suspend grid investment until the Commission considered [‘an investment in a qualified smart grid system based on appropriate factors’.]”¹¹ The Proposed Decision appears to prefer speed over prudence.

The issue which CFC asks the Commission to consider is whether utility independence is consistent with the creation of a Smart Grid. The Assigned Commissioner appears to have determined that regulatory oversight of smart grid investments must be minimized to avoid ‘slowing infrastructure investment and modernization.’¹² But, as TURN points out, “lack of consideration of “smart grid” alternatives could eventually harm ratepayers if it results in stranded costs,” as it did when PG&E decided it needed to “replace upwards of 250,000 meters installed as part of its AMI with a different solid state meter.”¹³ The U.S. Department of Energy envisions a long-term phased installation of Smart Grid technologies:

The efficient evolution to a Smart Grid will require a coordinated strategy that relies upon building an appropriate electric infrastructure foundation to maximize utilization of the existing system. A Smart Grid is a new integrated operational and conceptual model for utility operations. Among other things, it envisions the real-time monitoring of all utility transformers, transmission and distribution line segments, generation units, and consumer usage, along with the ability to change the performance of each monitored device. This will require significant planning for both implementing a system-wide installation of monitoring devices (including monitoring devices at the consumer level), and for installing the equipment necessary to enable parts of the system to “talk” with other components and take rerouting, self-healing, and other actions independent of system operators. Developing such an integrated system requires a multi-year, phased installation of Smart Grid devices and upgraded computer and communication capabilities; those investing in this technology likely will not realize the value until the return value of the combined benefits of these technologies are achieved.¹⁴

Taking the time to examine a utility’s decision to make a Smart Grid investment, particularly an investment which will result in an assessment on customers of tens of millions of dollars or more, is both equitable and necessary. The investments of California utilities in a qualified smart grid system must be coordinated using “appropriate factors, including--

¹⁰ SB 17 (2009) which added Chapter 4 (commencing with Section 8360) to Division 4.1 of the Public Utilities Code, relating to electricity.

¹¹ Proposed Decision at 27, inserting language of the statute in brackets.

¹² Proposed Decision at 27.

¹³ TURN Comments (Oct. 26, 2009), at 3.

¹⁴ U.S. DEPT. OF ENERGY, OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY, ELECTRICITY ADVISORY COMMITTEE: “Smart Grid: Enabler of the New Energy Economy” (Dec. 2008) at § 3.3, p. 14. <http://www.oe.energy.gov/DocumentsandMedia/final-smart-grid-report.pdf>

- (i) total costs;
- (ii) cost-effectiveness;
- (iii) improved reliability;
- (iv) security;
- (v) system performance; and
- (vi) societal benefit.

CFC asks the Commission to adopt a modified version of the PURPA standard and require that each utility demonstrate, before making a major smart grid investment, that it has considered the “appropriate factors.”

WHEREFORE, the Consumer Federation of California respectfully requests the Commission to adopt pertinent sections of the Proposed Decision set forth herein, and to give further consideration to the Assigned Commissioner’s rejection of the EISA/PURPA standard relating to consideration of alternative smart grid investments as part of the state-wide planning process put in play by SB 17.

DATE: December 7, 2009

CONSUMER FEDERATION OF CALIFORNIA

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CERTIFICATE OF SERVICE

I hereby certify that on December 7, 2009, I served by e-mail all parties on the service lists for R.08-12-009 for which an email address was known, true copies of the original of the following document which is attached hereto:

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The names and e-mail addresses of parties served by e-mail are shown on an attachment. In addition, I served the following persons by enclosing said document in an envelope addressed to them and depositing the envelope in the U.S. Mail, with postage prepaid:

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