BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

FILED
06-02-11
04:59 PM

Order Instituting Rulemaking to Consider Smart Grid Technologies Pursuant to Federal Legislation and on the Commission's own Motion to Actively Guide Policy in California's Development of a Smart Grid System.	Rulemaking 08-12-009 (Filed December 18, 2008)

OPENING COMMENTS OF THE CONSUMER FEDERATION OF CALIFORNIA ON THE PROPOSED DECISION ADOPTING RULES TO PROTECT PRIVACY AND SECURITY OF THE ELECTRICITY USAGE DATA OF THE CUSTOMERS OF PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIAN EDISON COMPANY, AND SAN DIEGO GAS AND ELECTRIC COMPANY

Pursuant to Rules 14.3 and 14.6 of the Commission's Rules of Practice and Procedure, the Consumer Federation of California ("CFC") submits these comments on Commissioner Peevey's Proposed Decision *Adopting Rules to Protect Privacy and Security of the Electricity Usage Data of the Customers of Pacific Gas and Electric, Southern California Edison Company, and San Diego Gas and Electricity* ("PD" or "Proposed Decision"), R. 08-12-009.

CFC supports the Commission's adoption of the FIP principles to use as a framework to develop Smart Grid privacy rules. CFC agrees with the Commission's findings of fact that FIP principles "offer a practical tool for developing rules to protect the privacy and security of electricity usage data.

CFC also supports Commission's adoption of data minimization principle as "data quality and integrity is critical to rendering of accurate and reasonable bills."[1]

[1] PD at 105.

CFC generally supports the Commissions adoption providing pricing information to customers.

CFC, however, would like to propose the following recommendations:

- The Commission should modify the PD to broaden jurisdiction to all parties who seek to possess Smart-Grid related data.
- The Commission should modify privacy rules to reflect a balance in responsibility and accountability between utilities and customers. The PD does a good job in adopting requirements that promote customer empowerment and awareness; however, there are not any rules impose disciplinary measures should entities violate privacy rules.
- The Commission should restore Rule 4 (c) (2) to the original CDT language. The original language better reflects past Commission precedent and PUC code and is consistent with SB1476.
- The Commission should ensure that covered entities will not stretch interpretations of "primary purposes" to fit a particular category of the current definition.
- The PD should clarify that the Commission intends to codify customer privacy rules.

I. DISCUSSION

A. THE COMMISSION SHOULD BROADEN JURISDICTION TO INCLUDE ALL PARTIES WHO SEEK TO POSSESS SMART-GRID RELATED DATA.

The proposed decision PD states that "there is little controversy concerning the authority of the Commission to protect the privacy of information in the hands of the utility." CFC agrees that jurisdiction over utilities is clear and is supported by legislation, Commission adopted rules and case precedent. The PD falls short however, when it comes to extending jurisdiction over all parties that seek to possess and use Smart-Grid related data.

The Commission has an opportunity to learn from lessons past. Although, Smart Grid related technology may be novel, and developing rules and regulations for privacy issues as it relates to Smart Grid may be the first of its kind in California, consumer privacy issues relating to digital technology is now new. Smart Grid technology is an outgrowth of information technology.

At the advent information technology and digital age, individual responsibility was favored by regulators as the most effective form of privacy protection, with the law serving as a gap-filler.[2] There was an overarching philosophy that "privacy rights were to facilitate--not interfere with--the development of private mechanisms and individual choice as a means of valuing and protecting privacy."[3] However, years after significant security breaches happened, regulators realized that self-regulation was not enough and regulated privacy protections were necessary.

Here, the Commission has proposed in its PD consumer protections that essentially regulates the utility and third parties with whom the utilities contract. However, this information has the potential to be in the hands of many who will find ways to bypass these privacy protections and create, as the Customer Representatives argued, "a huge unmanageable loophole within the carefully crafted privacy protections."[4] Third parties can still gain ostensible customer-authorized access to energy data through deceptive or misleading practices. By failing to regulate *all* parties that may have access over consumption data, the Commission is subscribing to a form of self-regulation, leaving it up to "empowered" consumers to essentially

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[2] The FTC, The Unfairness Doctrine, and Data Security breach litigation: Has the Commission gone too far? , by Michael D. Scott at 6.

[3] Id. at 6.

[4] Customer Representatives opening brief at 2.

safeguard themselves. The Commission should heed to mistakes made in the past and create effective privacy rules that have the power to prevent and enforce violations of privacy.

This assumption that a well informed body of consumers will discipline the marketplace and protect themselves in the face of privacy breaches has already proven to be ineffective and consumers, the innocent body, are still paying for these past mistakes today. Consumers are the victims of information and identity theft. Consumers unwittingly give permission to have their information sold to telemarketers. Once a customer's information is out, it is nearly impossible reverse the effects. Now is the time to put effective protections in place for all entities that may be a part of the chain of parties possibly getting a hold of an electric customer's information.

The Commission has a chance to change history and create a robust set of privacy rules that protect the consumer at every angle. It can do this by extending its jurisdiction to Smart Grid related data. However, the PD's proposed rules fails to do this. In reply briefs, DRA, TURN, and UCAN ("Customer Representatives") offered compelling arguments advocating the adoption of privacy rules to all who seek to possess Smart-Grid related data. One of the arguments spoke specifically to a customer's limited choice in choosing Smart Grid related technologies because electric customers are customers of monopolies:

> *There is another issue upon which consensus is scarce- in large part because the third-parties and utilities are silent on the matter of choice-or rather, absence of choice. The state's electric customers were not given options as to whether smart meters with HAN devices were to be installed upon their houses and businesses. They were not given an option to decline these intrusive instruments if they were concerned about their privacy being preserved. Unlike phones, railroads, moving trucks, or other necessary services overseen by this Commission, the smart meters that currently pose threats to customer privacy were mandated for every customer. There was no choice involved. Further, it was the Commissions desire to further energy goals that caused it to extend smart meter installation universally.* ***Thus, at every step of the way, the Commission is involved in regulation. It simply cannot abdicate the final step***

in this process by leaving consumers alone to suffer the vicissitudes of the third party's customer policies and practices.[5]

Without limited jurisdiction over customers or customer data, third parties that bypass utilities will undeniably find a way to access usage data without adequate permission from the customers.

In addition, the Commission has extended limited jurisdiction over entities that are not within the Commission's jurisdiction to ensure the safety and welfare of Californians. CFC provided, and was supported by Customer Representatives, recent Commission precedent in its opening brief that enumerated this safety related jurisdiction[6]:

> *In Rulemaking 08-11-005, the Los Angeles Department of Water and Power ("LADWP") brought a request of a rehearing on the grounds that the Commission exceeded its authority by asserting its jurisdiction over publicly owned utilities in contradiction to PUC Utilities Code §364(a).*
>
> *Section 364 (a) of the Public Util. Code states:*
>
> *The commission shall adopt inspection, maintenance, repair, and replacement standards for the distribution systems of investor-owned electric utilities no later than March 31, 1997. The standards, which shall be performance or prescriptive standards, or both, as appropriate, for each substantial type of distribution equipment or facility, shall provide for high quality, safe and reliable service.*
>
> *LADWP argued that adhering to §364 (a), the Commission adopted GO165, an order adopting standards to ensure the safe and high-quality electrical services, which was expressly applied to the Investor owned utilities, PG & E, San Diego Gas and Electric Company, Sierra Pacific Power Company and Southern California Edison Company,[7] and was never formally amended to include other utilities.*

[5] Customer Representatives Reply Briefs at 2

[6] CFC opening brief at 10.

> *The PUC denied LADWP's application for a rehearing ruling that Commission can extend jurisdiction to publicly owned utilities for the limited purpose of adopting and enforcing rules governing electric transmission and distribution facilities to protect the safety of employees and the general public. The Commission noted that under this safety related jurisdiction, the Commission has jurisdiction over the safety of surface or underground wires used to conduct electricity, and may adopt additional requirements it deems necessary to ensure the safety of employee and the general public.*

As stated above, the Commission has the authority to extend jurisdiction as it sees fit, and has done so when it relates to the safety and welfare of its customers. A customer's privacy is also a safety-related issue. Smart Grid related data contains very sensitive information that will reveal a customer's personal behaviors and routines. An entity that can monitor a person's whereabouts based on their energy usage data can become a very real safety issue.

Parties who oppose a robust set of rules and regulations use the argument that privacy rules stifle innovation. This argument has been used before. However, CFC believes that a lack of strong privacy protections can also stifles innovation, as there may be an erosion of confidence by consumers in Smart-Grid related technology that may cause a negative impact in the growth of this technology and commerce in general. Customers continue to reject the idea of Smart Grid technologies in their home. Creating a set of privacy rules that leaves large gaps in regulation will not instill the appropriate assurances for consumers to have peace of mind. By contrast, adequate privacy rules will allow companies to reach their full potential because they will have the trust of the public.

B. THE COMMISSION SHOULD IMPOSE PENALTIES ON ENTITIES THAT MISUSE CUSTOMER DATA.

The PD adopted requirements that 1) require customer consent of information, except for "primary purposes," 2) creates tariff conditions for receiving covered information, an entity must agree to comply with the adopted privacy rules 3) customer

right to withdraw third-party access 4) reporting of security breaches 5) utilities and the Commission can track complaints, and if necessary, find that the third party should not be eligible to obtain consumption data from the utility because its practices fail to comply with the rules adopted.[8] The PD does a good job in adopting requirements that promote customer awareness and empowerment. The PD requirements, however, lack the backbone of enforcement.

Rules are meaningless unless there are safeguards in place to enforce rules with strict compliance. TURN mentioned in their reply comments:

> TURN continues to be extremely troubled by the lack of enforcement and lack of potential penalties to deter violations….TURN strongly recommends the adoption of a set fine as a deterrent. We also suggest a registration process, and violations should lead to suspension, similarly to the provision for deregistering an ESP under the PUC section.[9]

CFC agreed and continues to agree with this statement. Currently, the rules proposed in the PD offer little measure of real accountability if entities violate proposed privacy rules. Simply terminating disclosures when third parties violate contractual obligations and ceasing to continue disclosing covered information to such third party is simply not enough to deter third parties or the utilities from inappropriately using customer information.

The Commission has enforced strict compliance to violated rules in the past and should do so now. For example, in §2105.7 imposes penalties on *all persons and entities* who violated §458 and §459 of the PUC code:

> When the commission finds, after hearing, that any person

[8] PD at 83.

[9] TURN reply comments at 9.

> or corporation has knowingly aided or abetted a common carrier in violating Section 458 or has violated Section 459, or any order, decision, rule, regulation, direction, demand, or requirement issued under those provisions, the commission may impose a fine for each violation not to exceed five thousand dollars ($5,000). In addition to the fine, the commission may impose interest on the fine, not to exceed the maximum rate of interest provided for in Section 1 of Article XV of the Constitution. Interest shall commence to accrue on the date when the payment of the fine becomes delinquent.

In addition, the Commission has imposed penalties, including third parties, for violations of §588 in §2112.5:

> Notwithstanding any other provision of law, any person who willfully violates the provisions of Section 588 is guilty of a misdemeanor, subject to a penalty of not less than five hundred dollars ($500), nor more than two thousand dollars ($2,000), for each offense.

C. THE COMMISSION SHOULD RESTORE PROPOSED RULE 4(C) (2) TO THE ORIGINAL LANGUAGE RECCOMMENDED BY CDT.

CDT recommended that the Commission adopt rules for Individual Participation based on the FIP principles. The original recommendation for rule 4 (c) (2) stated:

> 2) Unless otherwise prohibited by court order, law or order of the Commission, a covered <u>entity upon receipt of a demand for disclosure of covered information pursuant to legal process,</u> shall, prior to complying, notify the customer in writing and allow the customer 7 days to appear the contest the claim of the person or entity seeking disclosure.[10]

The Commission modified this rule based on SCE's argument that this current rule "exceeds current requirements for the IOU under law and Commission order, and would place the IOUs in a position of possibly interfering with law enforcement

[10] PD at 53.

activities."[11] SCE then provided §588 as an argument, which allows a District Attorney to access limited customer information such as a customer's name, address, and number (not usage data) from public utilities in child abduction cases. The proposed rule now reads:

> 2) Unless otherwise prohibited by court order, law, or order of the Commission, a covered entity, upon receipt of a subpoena for disclosure of covered information pursuant to legal process, shall, prior to complying, notify the customer in writing and allow the customer 7 days to appear and contest the claim of the person or entity seeking disclosure.[12]

In effect, the Commission narrows the possibilities of utilities notifying customers that their information is being requested pursuant to a legal process to *only* to a subpoena.[13] However, there are other legal processes that may warrant disclosure of customer's information and a customer should have the right to know that their information is being accessed with the opportunity to contest the claim. However, this rule will allow an entity seeking disclosure to receive usage data without notifying a customer or giving the customer an opportunity to contest *unless* there's a subpoena.

1. SCE's argument

The PD uses [SCE's argument] §588 as the reason why the 4 (c) (2) should be modified. However §588 only allows the DA to access limited customer information such as full name, address, prior address, and place of employment, *not* their usage data.

In addition, as stated in D01-07-032 in the *Opinion Denying Petition of California Narcotics Officers Association to Modify Decision 90-12-121,* where the Commission

[11] PD at 55.

[12] PD at 111.

[13] PD at 57.

opposed California Narcotics Officers Association argument of using §588 as an example to allow CNOA unrestricted access to customer information without customer notification. The Commission explained that §588 is a limited exception with strict compliance rules:

> while [§588] does empower inspectors and investigators in child abduction cases to obtain specified utility information without a warrant or subpoena in cases where the inspector has a reasonable, good faith belief that the utility customer assist the inspector or investigator in the location or recovery of the minor child or abductor, the statute provides that only the specifically-designated inspectors or investigators may seek this information, requires the inspector or investigators to submit an affidavit of probable cause supporting the request to the utility, and requires the utility to retain such affadavits for at least one year. Second, the bill that added §588 to the Pub. Util. Code, also added § 2112.5, which makes willful violations of §588 a misdemeanor punishable by a penalty of between $500 and $2000 per offense. This indicates … that the Legislature intended to carve out a very limited exception to [the Commission's] privacy rules, but included penalty provisions to ensure that the procedural safeguards included in §588 were strictly complied with.[14]

In the case of disclosing customer information pursuant to legal process, limiting a customer's right to authorize a disclosure only to only subpoenas undermines §394.4 of the PUC code which states that "customer information shall be confidential unless the customer consents in writing."

Consequently, this modified rule narrows a customer right to privacy protection, opening the floodgates for entities to pursue access to customer data through legal processes such as discovery requests or the like without having to give customers notification that their information is being requested and a right to contest the disclosure.

D. THE COMMISSION SHOULD INCORPORATE LANGUAGE IN PRIVACY RULES THAT WOULD LIMIT ENTITIES FROM STRETCHING THE MEANING OF "PRIMARY PURPOSE" TO FIT ANY OF THE DEFINITIONS.

[14] D.01-07032 at 17 (Footnote 13).

The Commission should incorporate a clause in the privacy rules that would limit entities from stretching the meaning of "primary purpose." Currently, the definitions are broad enough to include many interpretations of what "primary purpose" means, giving entities a chance to circumvent privacy rules under the guise that they are using this information for a primary purpose.

E. THE PD SHOULD CLARIFY WHETHER IT WILL CODIFY SMART GRID PRIVACY RULES.

Section 5.9 of the Proposed Decision discusses parties' positions on codification of customer privacy standards for Smart Grid. The PD mentions different parties' decisions but is silent on whether it will affirmatively create a process to codify these privacy standards either in the form of a General Order, policy statement, or some other measure. CFC agrees with the parties who support codification of customer privacy rules as it will formalize these rules and make them easily accessible to the public. The Commission should add language in the PD that states that Commission intends to codify customer privacy standards.

Dated: June 2, 2011

Respectfully Submitted,

By: _____// s //_____

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COMMENTS OF THE CONSUMER FEDERATION OF CALIFORNIA ON THE PROPOSED DECISION

Appendix

Proposed changes to Findings of Fact, Conclusions of Law & Orders

Fact #26:

It is reasonable to require the advance notice to a customer of a request by an authority for access to covered information held by a covered entity, with the limited exception of §588.

Fact #28

Individual Participation (Access and Control)

4 (c) (2)

Unless otherwise prohibited by court order, law order, or order of the Commission, a covered entity, upon receipt of a demand for disclosure of covered information pursuant to legal process, shall, prior to complying, notify the customer in writing, and allow the customer 7 days to appear and contest the claim of the person or entity seeking disclosure.

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CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2011, I served by e-mail all parties on the service list 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:

OPENING COMMENTS OF THE CONSUMER FEDERATION OF CALIFORNIA ON THE PROPOSED DECISION ADOPTING RULES TO PROTECT PRIVACY AND SECURITY OF THE ELECTRICITY USAGE DATA OF THE CUSTOMERS OF PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIAN EDISON COMPANY, AND SAN DIEGO GAS AND ELECTRIC COMPANY

on all known parties of record in proceeding R.08-12-009 by delivering a copy via email to the current service list or by delivering a copy via U.S. First Class mail to those parties of the current service list with undeliverable email addresses.

Executed on June 2, 2011 in Sacramento, CA.

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_____//s//_____

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