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

Order Instituting Rulemaking Regarding Policies, Procedures and Rules for Development of Distribution Resources Plans Pursuant to Public Utilities Code Section 769.	Rulemaking 14-08-013
And Related Matters.	Application 15-07-002 Application 15-07-003 Application 15-07-006
<b>(NOT CONSOLIDATED)</b>	
In the Matter of the Application of PacifiCorp (U901E) Setting Forth its Distribution Resource Plan Pursuant to Public Utilities Code Section 769.	Application 15-07-005
And Related Matters.	Application 15-07-007 Application 15-07-008

**ADMINISTRATIVE LAW JUDGE'S RULING REGARDING  
PHOTO VOLTAIC RENEWABLE AUCTION MECHANISM MAPS**

**Summary**

This *Ruling* addresses the issue of whether Photo Voltaic Renewable Auction Mechanism Maps, that were previously made available to the public but were recently taken down, must again be made publically available.

## **1. Background**

On September 26, 2018, I convened a law and motion hearing to address the *Joint Motion of Pacific Gas and Electric Company and Southern California Edison Company for Public Workshop and Opportunity for Stakeholder Comments Prior to Implementation of Administrative Law Judge's July 24, 2018 Ruling Adopting Data Redaction Criteria*. At the hearing, it was brought to my attention that on or about the beginning of September, 2018, Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Investor-owned Utilities or IOUs) had removed, from public view, their Photo Voltaic Renewable Auction Mechanism Maps (PV RAM Maps), which displayed the physical location of the IOUs' facilities. (Reporter's Transcript [RT], 262:10-22; 263:18-27.) Prior to September of 2018, the IOUs had made these PV RAM Maps publically available pursuant to the Commission's decision in Decision (D.) 10-12-048 (*Decision Adopting The Renewable Auction Mechanism*). (RT, 261:2-7.) But after I issued my *July 24, 2018 Ruling*, the IOUs took the PV RAM Maps down (RT, 264:17-265:15.), and instead shifted them to a confidential portal available to any stakeholder who met the access protocols set forth in my *July 24, 2018 Ruling*. (RT, 265:16-28.)

## **2. Discussion**

The IOUs should not have taken the PV RAM Maps down from public view and then shifted them to a confidential portal, as my *July 24, 2018 Ruling* did not give the IOUs the authority to countermand a prior Commission decision that the PV RAM Maps be made public. D.10-12-048 determined that the PV RAM Maps must provide data at the substation or circuit level. (Conclusions of Law 44 and 46; and Appendix A: Summary of Adopted Program at 5.) Since the requirement to make the PV RAM Maps publically available was done through a

Commission decision, the IOUs must continue to comply with same and pursue alternative remedies, such as a petition for modification pursuant to Rule 16.4 of the Commission's Rules of Practice and Procedure, to be relieved from this requirement.

The parameters surrounding requirement that PV MAP Maps be publically available were also addressed in Resolution E-4414. Issued on August 22, 2011, Resolution E-4414, at 47, contained the following three Ordering Paragraphs relevant to this issue:

24. In its renewable auction mechanism map, Southern California Edison Company shall provide the available capacity at the substation or circuit level for its preferred locations within 30 days of this resolution.

25. The Investor-owned utilities shall post publicly by March 31, 2012 updated maps that cover their service territory, including both the distribution and transmission system.

26. The investor-owned utilities may require developers to register in order to access the interconnection maps as an alternative to signing a non-disclosure agreement. The investor-owned utilities shall not require signing a non-disclosure agreement to access the interconnection maps.

My *July 24, 2018 Ruling* did not address, nor could it reverse, a resolution that the Commissioners adopted.

In addition, the IOUs should not have taken the PV RAM Maps down from public view and then shifted them to a confidential portal, as my *July 24, 2018 Ruling* addressed upcoming, rather than existing, maps. The IOUs are required to comply with Ordering Paragraph 6 of D.17-09-026, which required the IOUs to implement the approved Integrated Capacity Analysis methodology, and Locational Net Benefit Analysis methodology, on a system-

wide basis, and part of that requirement entailed making certain data available to the public via an online map and/or data portal. The deadline to comply with Ordering Paragraph 6 has been extended to December 31, 2018 by Alice Stebbins, the Commission's Executive Director, in her August 31, 2018 letter. The stated purpose for granting the extension was to give the IOUs additional time "in order to work with Commission staff and stakeholders to implement the confidentiality criteria created in the July 24, 2018 Administrative Law Judge's Ruling." (Stebbins Letter at 1.)

As such, the purpose of my *July 24, 2018 Ruling* was to provide the parties with assistance by articulating categories of critical electrical infrastructure information that the IOUs could utilize to justifying the redaction of information from the upcoming online maps in order to protect the information from physical and, or, cyber security attacks. It was not my intent that my *July 24, 2018 Ruling* be used by the IOUs as a justification for taking down the PV RAM Maps.

**IT IS RULED** that:

1. The purpose of my *July 24, 2018 Ruling* was to provide the parties with assistance in complying with Ordering Paragraph 6 of Decision (D.) 17-09-026, by articulating categories of critical electrical infrastructure information that Pacific Gas and Electric Company, San Diego Gas & Electric Company, and Southern California Edison Company (Investor-owned Utilities or IOUs) could utilize to justifying the redaction of information from the upcoming online maps and/or data portal in order to protect the information from physical and, or, cyber security attacks.

2. My *July 24, 2018 Ruling* was not intended to address the requirements set forth in D.10-12-048 and Resolution E-4414 regarding making Photo Voltaic Renewable Auction Mechanism Maps (PV RAM Maps) publically available.

3. Within five days from the date of this *Ruling*, the IOUs shall make the PV RAM Maps publically available, as they did before, in conformity with D.10-12-048 and Resolution E-4414.

Dated October 9, 2018, at San Francisco, California.

/s/ ROBERT M. MASON III

Robert M. Mason III  
Administrative Law Judge