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TO PARTIES OF RECORD IN RULEMAKING 22-11-013:

This is the proposed decision of Commissioner Darcie L. Houck. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's December 17, 2026, Business Meeting. To confirm when the item will be heard, please *see* the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ Michelle Cooke
Michelle Cooke
Chief Administrative Law Judge

MLC:abb
Attachment

COM/DH7/abb **PROPOSED DECISION** **Agenda ID #24648**
Quasi-Legislative

Decision **PROPOSED DECISION OF ASSIGNED COMMISSIONER DARCIE L. HOUCK (Mailed 11/13/2026)**

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Consider Distributed Energy Resource Program Cost-Effectiveness Issues, Data Access and Use, and Equipment Performance Standards.	Rulemaking 22-11-013

DECISION MODIFYING DATA STANDARDS FOR DISTRIBUTED ENERGY RESOURCES

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DECISION MODIFYING DATA STANDARDS FOR DISTRIBUTED ENERGY RESOURCES

Summary

This decision modifies existing data access rules and procedures and adopts new data access and delivery requirements to facilitate greater access to distributed energy resource (DER) data, support interoperability of DERs, and enable effective deployment and usage of DERs. This decision addresses the findings and recommendations from the Data Working Group (DWG), which identified DER data access issues, explored potential solutions, and developed recommendations to improve access to, use of, and governance around DER-related data. Based on the work of the DWG, this decision adopts several changes to the Commission's data access rules.

This decision clarifies that data related to customer metered consumption, including energy savings estimates derived from usage-related data, are subject to applicable confidentiality protections and aggregation thresholds. This decision concludes that Energy Division is authorized to conduct or commission a study that evaluates whether a 4/50 aggregation threshold (at least four customers, with no single customer accounting for more than 50 percent of the total) would sufficiently protect customer privacy for the public release of non-consented monthly and annual energy usage data. The study will also consider whether hourly and sub-hourly data could be released under the 4/50 or an alternative threshold. In the interim, the existing thresholds remain in effect, and the decision directs the investor-owned utilities (IOUs) to propose a standardized method for calculating and applying the existing 15/15 rule.

This decision expands access to energy data for all requestors, including Tribal governments, by authorizing them to request utility customer data through the Energy Data Request Program (EDRP) under the rules applicable to

local governments, and removes the nondisclosure requirement from the Terms of Service.[1] It establishes deadlines for certain disputes a requestor raises through the EDRP releases, as well as encourages the alignment of data publication requirements across ratepayer funded programs.

This decision finds that the Commission should continue to explore an alternative data access pathway for multifamily properties and customers without online accounts.

This decision requires enhanced data sharing between Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company (collectively the IOUs) and the Community Choice Aggregators (CCAs) in their territories. We direct the IOUs to deliver interval usage data to CCAs daily. The IOUs must also provide interval usage data for at least 98 percent of CCA accounts within 48 hours of receiving a request, reducing that down to 24 hours within one year of this decision.

This decision directs further examination of the feasibility, costs and benefits of establishing a statewide data access platform, a DER registry, and a microgrid data clearinghouse, in coordination with the California Energy Commission. This decision defers the long-term coordination of DER control to the DER orchestration framework process set forth in D.26-10-054.

The decision does not adopt cost allocation principles or authorize new costs for any data or delivery requirements.

This proceeding is closed.

[1] The EDRP process was originally referred to in D.14-05-016 as the Data Request and Release Process.

1. Background

The California Public Utilities Commission (Commission) opened this proceeding in November 2022 through an Order Instituting Rulemaking (OIR). A prehearing conference was held on March 29, 2023. The Assigned Commissioner issued a scoping memo and ruling (Scoping Memo) on May 31, 2023.

The Scoping Memo for this proceeding created two phases. Phase 1 is comprised of three tracks. Track 1 addresses cost effectiveness for distributed energy resources (DERs), Track 2 considers DER data use and access, and Track 3 focuses on guiding principles for the process used to evaluate cost effectiveness for DERs.

On December 1, 2023, the Assigned Commissioner issued a ruling (ACR) outlining the scope of work for a Data Working Group (DWG).[2] The purpose of the DWG was to identify DER data access issues and explore potential solutions. The DWG was directed to develop comprehensive recommendations to improve access to, use of, and governance around DER-related data. The DWG scope included: identifying priority use cases and corresponding data needs; evaluating existing utility and CCA data-sharing practices and the legal and technical barriers that limit data availability; proposing solutions such as aggregation and anonymization techniques; assessing applicable privacy requirements; and recommending best practices, protocols, and processes for secure, timely, and consistent data sharing. The DWG was also tasked with aligning its recommendations with related Commission proceedings and state

[2] Assigned Commissioner's Ruling Setting The Scope of Work for the Consultant, Scope of Work for the Data Working Group, and Formation of the Data Working Group, December 1, 2023 at 4.

policy objectives, and with proposing approaches to resolve data-related disputes among market participants.[3]

The California Center for Sustainable Communities (CCSC) at UCLA, with support from the Los Angeles Regional Collaborative for Climate Action and Sustainability (LARC) at the University of California, Los Angeles (collectively referred to as UCLA), facilitated a series of nine working group meetings from August 2024 to May 2025 on DER data access issues. UCLA then produced a draft report summarizing the DWG findings and recommendations on April 15, 2026.

After releasing the draft DWG Report, UCLA hosted a final meeting on May 7, 2026. Stakeholders were invited to provide comments on the draft DWG Report on May 15, 2026, and UCLA finalized the DWG Report on May 29, 2026. The final DWG Report was attached to an ALJ ruling with a set of questions on June 12, 2026 (DWG Report).[4] The following parties filed opening comments on July 6, 2026: Pacific Gas and Electric Company (PG&E), Southern California Edison (SCE), San Diego Gas & Electric Company and Southern California Gas Company (Sempra), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), California Community Choice Association (CalCCA), Small Business Utility Advocates (SBUA), Utility Consumers Action Network (UCAN), Clean Coalition, and Southern California Regional Energy Network (SoCalREN). Advanced Energy United (AEU) late filed opening comments on July 7, 2026. The following parties filed reply comments on

[3] *Id.*

[4] Data Working Group Final Report (DWG Report), June 5, 2026, Attachment to an ALJ ruling issued on June 12, 2026.

July 13, 2026: 350 Bay Area, UCAN, Clean Coalition, PG&E, SCE, SBUA, Sempra IOUs, and AEU.

1.1. Submission Date

This matter was submitted on July 13, 2026, upon receipt of reply comments in response to the assigned Administrative Law Judge's rulings on June 12, 2026, and June 22, 2026.

2. Issues Before the Commission

The issues the Commission identified and adopted in the Scoping Memo for Phase One, Track Two of this proceeding are:[5]

1. What rules and requirements should the Commission develop or modify to improve data access to support the following:
    a. Enable customers and other entities to make informed decisions on selecting, adopting, evaluating, and utilizing DERs;
    b. Increase accuracy of load forecasting; and
    c. Align with other DER-related Commission proceedings, particularly R.22-07-005 (Demand Flexibility OIR) and R.21-06-017 (High DER Future Grid OIR), including enabling customer interaction with real-time pricing portals?
2. In considering the development or modification of data usage and access rules and requirements, how should the Commission consider the following issues:
    a. Customer privacy;[6]
    b. Barriers to data sharing and data access;
    c. The standardization or centralization of databases, data models, data collection, and data reporting tools;

[5] Assigned Commissioner's Scoping Memo and Ruling, May 31, 2023 at 6 – 7.

[6] Customer privacy issues include issues related to confidentiality of customer data.

d. Developing or improving data management best practices, and

e. Identifying and removing data reporting redundancies?

3. What data-related issues are specific to environmental and social justice (ESJ) communities and how do we address these issues to facilitate DER adoption in ESJ communities?

This decision addresses all issues in Phase One, Track Two and closes the proceeding.

3. Discussion and Analysis

The following section presents recommendations in the DWG Report, party comments on the DWG Report recommendations, and includes the Commission's disposition of each item.

3.1. General Data Principles

Empowering customers and other market actors to make informed decisions about selecting, using and later evaluating DERs requires access to data. The DWG Report identified uniformity, transparency and standardization of data as necessary for efficient deployment of DERs in the California grid.

3.1.1. Uniformity, Transparency and Standardization

The DWG Report recommends the following regarding data uniformity:[7]

1. The Commission and the California Energy Commission (CEC) should seek to adopt consistent confidentiality rules, including aggregation thresholds for the public release of consumption data.
2. The Commission should coordinate with the California Independent System Operator (CAISO) and CEC to assess what levels of Advanced Metering Infrastructure (AMI) data granularity and latency are necessary to support different energy planning and program operations use cases.

[7] DWG Report, June 5, 2026, at 92.

3. The Commission should work toward uniform program eligibility rules across ratepayer-funded DER, energy efficiency, and building electrification programs to the extent feasible.

The DWG Report recommends the following regarding transparency:[8]

1. The Commission should develop a public website which collates documents and filings associated with previous Commission rulings on data collection and access.
2. The Commission should conduct a comprehensive inventory of all data collected by both the Commission and the CEC.

The DWG Report recommends the following regarding standardization:[9]

1. In coordination with the CEC, the Commission should seek to standardize temporal and spatial reporting geographies.
2. The Commission, in coordination with the CEC and the California Department of Housing and Community Development (HCD), should pursue and adopt standardized definitions and labels for utility premises with a set of universal building IDs.
3. The Commission, in close coordination with the CEC, CAISO, DER providers and investor-owned utilities (IOUs), should work toward standardizing DER telemetry data format and access.
4. The Commission, in close coordination with IOUs, and third-party implementers should work to standardize the reporting fields used across ratepayer-funded programs.

3.1.2. Party Comments

Party comments point out challenges regarding access to data, including examples about the current lack of uniformity, transparency and standardization. Clean Coalition's comments state that information in the DWG

[8] *Id.*, at 93.

[9] *Id.*, at 94 – 95.

Report, "confirms that current data access is fragmented across tools, entities, formats, privacy rules, and utility-controlled platforms."[10] SoCalREN also notes that the DWG recommendations on timely and standardized access to customer and program data are the most actionable as "they address implementation barriers that affect the delivery of customer benefits across the full SoCalREN portfolio."[11]

Other party comments highlight problems with the existing data flow. For example, UCAN's comments address the lack of data uniformity, transparency and standardization for CCAs by stating that the DWG Report "documents that each utility collects AMI interval data from all smart meters and completes validation, editing and estimation (VEE) processing on a daily basis. However, only SCE actually delivers raw usage data to CCAs within 24 hours."[12] UCAN's comments go further, noting that PG&E can take three to seven days and SDG&E can take three to five days to provide data to CCAs.[13] Finally, UCAN's comments point out that data access processes are not standardized across the three IOUs.[14]

Cal Advocates also addresses standardization in its comments about aggregation, recommending that the Commission develop a standardized geographic reporting framework instead of establishing one mandatory geographic unit of aggregation for all public data products.[15] Clean Coalition's

[10] Clean Coalition Opening Comments at 1.

[11] SoCalREN Opening Comments at 4.

[12] UCAN Opening at 5-6.

[13] *Id.*, at 6.

[14] *Id.*, at 7.

[15] Cal Advocates Opening Comments at 2.

comments, like Cal Advocates' and UCAN's, urge the Commission to support and prioritize applying aggregation rules consistently across IOUs.[16]

The IOUs also point to areas where data standards may be beneficial. SCE's comments mentioned that the development of data standards for DERs may help reduce costs associated with integrating DERs from a wide variety of technologies and aggregator platforms.[17] PG&E agrees with the DWG report recommendation that standardization of DER telemetry data formats to improve visibility for energy forecasting and grid operations would be helpful.[18] The Sempra IOUs also state that they support consistency in confidentiality, aggregation and anonymization rules.[19]

3.1.3. Discussion

The Commission agrees with parties that improving the public availability and visibility of energy data collected by California energy agencies, including the Commission and the California Energy Commission (CEC), supports greater transparency. Although the state does not currently maintain a centralized public inventory of the energy data routinely collected from regulated entities, improving the clarity and visibility of where such data is collected, maintained, and made available to the public is critical. To advance this goal, the Commission needs to provide clear, visible, and accessible information identifying the type of data collected, the geographic and temporal attributes of the data, and how frequently the data is reported. Therefore, we adopt transparency as a guiding principle that will inform the outcomes of this decision

[16] Clean Coalition Opening Comments at 2.

[17] SCE Opening Comments at 2.

[18] PG&E Opening Comments at 4.

[19] Sempra IOUs Opening Comments at 3.

and should inform future Commission action on development of data access standards.

On the matter of uniform program eligibility criteria and verification, many ratepayer-funded DERs, energy efficiency (EE), and building electrification (BE) programs are subject to different program eligibility rules and processes. Some program eligibility requirements are established by statute, while others are under the purview of the Commission. We agree that establishing uniform eligibility rules and verification processes, where allowable, would greatly ease the administrative burdens of both participating customers and program administrators. Therefore, we adopt uniformity as a guiding principle that will inform the outcomes of this decision and should inform future Commission action on data access.

Lastly, regarding standardization, we agree that there could be more efficient processes to ensure public access to energy consumption data. The CEC and the Commission have established different aggregation rules for public release of the consumption data they collect. The CEC's rules are found in Title 20, California Code of Regulations, while the Commission has set these rules through various general orders, decisions, and resolutions. Because the CEC collects data from entities not regulated by the Commission, it may not be possible to establish identical rules. We agree that standardization, where possible, should be adopted as a guiding principle that will inform the outcomes of this decision and should inform future Commission action on DER data access. As such, Energy Division staff are encouraged to work with CEC staff, IOUs, and other stakeholders to develop a common set of access rules for data collected from the IOUs, to the extent feasible. If and when a common set of access rules for data collected from the IOUs is developed, Energy Division staff

should submit the rules to the Commission via resolution and upon approval are to be published on the Commission's website. Publication of such joint data access rules on the respective agency websites will facilitate greater public access.

In addition, data collection requirements established by both the Commission and the CEC frequently incorporate different temporal and spatial data reporting geographies. Differing reporting timelines and geographic boundaries limit the ability to link agency hosted datasets as well as other external datasets that are important sources of context. Harmonizing these requirements will improve both the understandability of the data and the ability of researchers and regulators to better evaluate energy consumption trends and the effect of public policy efforts. Finally, we note that standardizing DER telemetry data formats would improve visibility for energy forecasting and grid operations, as new types of DER devices (e.g. smart thermostats, HVAC, etc.) and their proprietary communication protocols proliferate. The CEC is exploring adoption of standards based on emerging consensus protocols that could ensure basic interoperability at device and premise levels.

Communication standards and protocols for DER orchestration have also been raised in Track 2 of the High DER proceeding (R.21-06-017). Therefore, we encourage Energy Division staff and CEC staff to collaborate with the IOUs and other stakeholders regarding standards based on emerging consensus protocols and the work being addressed in the DER orchestration working group ordered in D.26-10-054. This coordination is intended to result in a common set of standards that will harmonize the temporal and spatial reporting geographies referenced above. Energy Division staff should hold a public workshop presenting the results of this collaboration. A workshop report is to be filed with recommendations formalizing common standards.

3.2. Data Governance

3.2.1. Infrastructure and Platform Development

The DWG Report recommends the following actions on data governance:[20]

1. The Commission and the CEC should seek to centralize agency-hosted data tools and systems.
2. The Commission should formalize a data sharing agreement with the CEC to facilitate both internal and external access to customer energy usage data collected by the CEC.
3. The Commission should establish a concrete timeline, within the next one to two years, for a statewide public data access portal and visualization dashboard that provides aggregated meter interval data consistent with revised aggregation thresholds.
4. The Commission should investigate the cost-effectiveness of alternative customer usage data access platforms, including a centralized statewide tool or a unified Green Button Connect platform across all IOU service areas.
5. The Commission should explore the costs and benefits of establishing statewide DER device registry to record data on DER asset locations, types, nameplate ratings, and other relevant technical capabilities.
6. The Commission should improve data-sharing mechanisms between IOUs and CCAs regarding DER program enrollment.
7. The Commission should, in coordination with the CEC, pursue the development of Application Programming Interfaces (APIs) for all future hosted data products, including energy consumption data.

3.2.2. Party Comments

Party comments on data governance address the merits of creating a statewide data access platform and a DER registry.

[20] DWG Report at 95 - 96.

3.2.2.1. Statewide Data Access Platform

Some parties, including SBUA[21], CalCCA[22], AEU and Clean Coalition, support the creation of a statewide data access platform. Clean Coalition's comments assert that the Commission should treat DER data access as grid infrastructure that is critical to the successful operation of the grid of the future.[23] AEU's comments express support for a statewide platform because customer and DER data are fragmented across utility-specific systems, have inconsistent authorization processes, and include non-standardized interfaces.[24] According to AEU, the value of a statewide platform is not measured by any single use case or program but by the efficiency gains it creates across the entire ecosystem.[25] AEU suggests that the Commission develop a Request for Information (RFI),[26] coordinated with the CEC, to inform an assessment of whether a statewide data access platform will be cost effective in achieving a portfolio of benefits and use cases, in comparison with existing data sharing costs.[27]

UCAN's comments advocate for the creation of a statewide platform that would standardize processes for customer permissions and authorized third-party access to interval usage, rate, billing and account data held by utilities.[28] According to UCAN, no single utility's system upgrade can solve

[21] SBUA Reply Comments at 1.

[22] CalCCA Opening Comments at 7.

[23] Clean Coalition Comments July 6, 2026 at 1.

[24] AEU Opening Comments at 3.

[25] *Id*.

[26] *Id*., at 2.

[27] *Id*.

[28] UCAN Opening Comments at 7.

existing data problems.[29] Like AEU, UCAN recommends that the Commission coordinate with the CEC to issue an RFI to evaluate commercially available statewide data platform solutions.[30]

The Sempra IOUs comments, in contrast, state that data centralization should not be presumed to be superior to existing controlled-access pathways without a demonstrated need and a clear governance framework.[31] Moreover, the Sempra IOUs comments also express concern that centralizing large datasets may increase cybersecurity, misuse, and customer reidentification risks.[32]

According to Cal Advocates, the Commission should not authorize a new ratepayer-funded statewide DER data platform unless the record first shows that the system would solve a defined DER data access problem, avoid duplication of existing tools, protect customer and grid-sensitive data, and provide benefits that exceed costs.[33] Cal Advocates asserts the proper role for the Commission at this stage is to further investigate the costs and benefits of a statewide platform using a five step approach.[34] The approach includes:

1. Identifying the public data access problem and explain why existing tools or lower-cost alternatives are insufficient;
2. Specifying the data products, intended users, access rules, update frequency, and privacy and cybersecurity protections;

[29] *Id.*

[30] *Id.*, at 8.

[31] Sempra IOUs Opening Comments at 12.

[32] *Id.*

[33] Cal Advocates Opening Comments at 17.

[34] Id.

3. Detailing all development, integration, operational, maintenance, and support costs;
4. Identifying existing systems that would be retained or replaced and any potential duplicative ratepayer costs; and
5. Identifying measurable ratepayer or public-interest benefits and how those benefits would be evaluated.[35]

3.2.2.2. DER Registry

UCAN's comments urge the Commission to take steps to develop a statewide DER registry whose purpose is to provide a unified, statewide record of DER asset locations, types, nameplate ratings, technical capabilities, and program enrollment status.[36]

SoCalREN's comments state that if the Commission elects to pursue a statewide DER Registry, it should ensure that any registry delivers measurable public benefits and avoids duplication of existing tools.[37] CalCCA's Comments support the Commission coordinating with the CEC, CAISO, IOUs, CCAs and other stakeholders to explore the option of creating a DER registry.[38]

SCE's comments state that it is not clear what public interest a statewide DER registry would serve or how it would work in practice.[39] SCE raises the question of whether the Commission could direct third parties and CCAs to populate a statewide DER registry. SCE asserts that because market participants would not want their customers to be identified to competitors, the DER registry would require complex data permission rules to keep certain data confidential and therefore should not be public. According to SCE, these competition

[35] Cal Advocates Opening Comments at 17-18.

[36] UCAN Opening Comments at 15.

[37] SoCal REN's Opening Comments at 9.

[38] CalCCA's Opening Comments at 12.

[39] SCE Opening Comments at 10.

concerns make it unclear which entity would be able to access the DER registry and questions its purpose.[40] Like SCE, PG&E's asserts that the record does not support development of a statewide registry at this time.[41] PG&E further states that before pursuing such a platform, the Commission should first evaluate whether existing IOU-hosted systems and access pathways can meet the identified needs through targeted improvements.[42]

Cal Advocates similarly asserts that the current record does not show that a new statewide public data access platform for DERs is necessary or would benefit ratepayers.[43] Similar to SCE's comments, Cal Advocates states that DER data may include customer-specific and premise-level data, and such information should not be treated as public by default.[44] Cal Advocates supports a future targeted gap assessment process that would determine "what DER data exists today, who holds the data, which data fields are incomplete or unavailable, what legal or contractual limits apply, and which gaps affect forecasting, distribution planning, program oversight, or reliability."[45]

3.2.3. Discussion

The Commission's objective is to develop cost-effective DER data access systems and processes that benefit ratepayers. Both the statewide DER data platform and the DER registry should be explored further, with the goal of addressing issues of data exchange with regards to enabling load flexibility,

[40] *Id.*

[41] PG&E Opening Comments at 11.

[42] *Id.* at 12.

[43] Cal Advocates Opening Comments at 15.

[44] *Id.*

[45] *Id.*

ensuring effective DER programs, and furthering distribution system operator (DSO) orchestration efforts, particularly where third party aggregators and CCAs are providing customer services.

3.2.3.1. Statewide Data Access Platform

We agree with suggestions by AEU, 350 Bay Area, SBUA, and Cal Advocates that we should continue to explore the costs and benefits of a statewide data platform.[46] We adopt Cal Advocates' recommendations regarding conducting a data gap assessment that analyzes the use of current data maintained by the Commission, and CEC to extent reasonable, to investigate next steps in both rectifying data gaps and moving towards a statewide platform. We direct Energy Division staff, in consultation with the CEC, IOUs, and other stakeholders, to develop a workplan for conducting this gap assessment. The workplan for the gap assessment should consider use of Cal Advocates' five step approach as a framework to further investigate the costs and benefits of a statewide platform.

3.2.3.2. DER Registry

We agree with SoCalREN that it is important to further explore the costs and benefits of establishing a statewide DER registry that would record data on DER asset locations, types, nameplate ratings, and other relevant technical capabilities. A DER registry should build upon the existing data collection processes and data platforms with expanded data collection and access capabilities, and should be implemented and administered by a qualified neutral third-party responsible for defining user roles and access levels and establishing protocols for automated data transfers and updates.

[46] AEU Opening Comments at 3, 350 Bay Area Reply Comments at 2, and SBUA Reply Comments at 2-4.

The Commission recently adopted D.26-10-054, which directed the IOUs to develop a DER orchestration framework through a comprehensive working group process, followed by a joint application. DER data is within the scope of the ordered process, including data needed for proper visibility and interaction with the electric transmission system. Through this process, the Commission will continue to consider the need for additional DER data tools in future Commission proceedings related to DER orchestration.

We find that it is prudent to continue to explore the costs and benefits of establishing a statewide DER device registry to record data on DER asset locations, types, nameplate ratings, and other relevant technical capabilities. The statewide DER registry would capture static nameplate data and program enrollment information but should not be responsible for collecting dynamic device telemetry. A statewide DER registry would build upon the existing data collection processes and data platforms with expanded data collection and access capabilities, and should be implemented and administered by a qualified neutral third-party data steward responsible for defining user roles and access levels and establishing protocols for automated data transfers and updates. We direct Energy Division staff, in consultation with the CEC, IOUs, and other stakeholders, to explore these and other specific components required for a DER registry.

The Clean Coalition proposed a clearinghouse for anonymized post-deployment microgrid data.[47] PG&E and the Sempra IOUs opposed the proposal, citing insufficient demonstration of need and cost-effectiveness for the narrow customer base affected.[48] We decline to adopt this proposal, without

[47] Clean Coalition Opening Comments at 4.

[48] PG&E Reply Comments at 3 and Sempra IOUs Reply Comments at 3-4.

prejudice, because the record is not sufficiently developed on this issue. We do however, direct Energy Division staff to further examine the proposal in exploring development of a statewide platform and DER registry.

3.3. Interagency Data Coordination

Interagency coordination recommendations are set forth throughout the DWG Report. The agencies identified for coordinating with the Commission on DER data issues are the CEC, HCD, and CAISO. Notable recommendations include:

1. The Commission, CEC, CAISO, IOUs, CCAs, third-party DER aggregators should develop a clear long-term vision for how DER devices will be controlled.[49]
2. The CEC and the Commission should pursue the development of APIs for all future hosted data products, including energy consumption data.[50]
3. The Commission and the CEC should seek to centralize agency-hosted data tools and systems.[51]
4. The Commission should pursue formalizing a data sharing agreement with the CEC to facilitate both internal (inter-agency) and external access to customer energy usage data collected by the CEC under Section 1353 of Title 20 of the California Code of Regulations.[52]
5. The Commission, in close coordination with the CEC, CAISO, DER providers, and IOUs, should work towards standardizing DER telemetry format and access.[53]
6. In coordination with the CEC and HCD, the Commission should pursue the adoption of standardized definitions

[49] DWG Report, June 5, 2026 at 101.

[50] *Id.*, at 96.

[51] *Id.*, at 95.

[52] *Id.*

[53] *Id.*, at 94.

and labels for utility premises and their associated buildings, such as adopting a set of universal building IDs.[54]

7. In coordination with the CEC, the Commission should seek to standardize temporal and spatial data reporting geographies.[55]
8. The Commission should coordinate with CAISO and the CEC to assess what levels of AMI data granularity and latency are necessary to support different energy planning and program operations use cases.[56]
9. The Commission and CEC should seek to adopt consistent confidentiality rules, including aggregation thresholds for the public release of energy consumption data.[57]

3.3.1. Party Comments

Cal Advocates recommend that the Commission should improve coordination with the CEC through a joint data inventory and data sharing agreement, as well as standardized data fields, metadata, reporting geographies, and reporting requirements.[58] Because the two agencies each collect customer usage data from the IOUs and other sources, Cal Advocates recommends the CEC and Commission staff should create a workplan with input from IOUs and others to create a data inventory.[59] The joint inventory would give the Commission a factual basis to determine whether data coordination problems are caused by missing data, inconsistent fields, duplicative reporting, unclear access

[54] *Id.*

[55] *Id.*, at 94.

[56] *Id.*, at 92.

[57] *Id.*

[58] Cal Advocates Opening Comments at 2.

[59] *Id.*, at 9.

rules, or limitations in existing systems.[60] In addition Cal Advocates recommends that the Commission develop a data-sharing agreement for internal interagency use, and develop broad based standardization of reporting geographies, data dictionaries, metadata, update frequencies, premises or building identifiers, DER attributes, and reporting fields for ratepayer-funded programs.[61]

PG&E supports the DWG Report's recommendations about confidentiality and data access between the Commission and CEC. However, PG&E cautions that any changes to aggregation or anonymization standards must be supported by privacy analysis and maintain safeguards such as data minimization, purpose limits, security controls, auditability, and accountability, in addition to being compliant with applicable law.[62] PG&E asserts that interagency coordination between the Commission and CEC should take place through a disciplined data governance framework.[63] Like Cal Advocates, PG&E points to the creation of an inventory, beginning with an interagency governance process that identifies what DER-related data each agency already collects, the authority and purpose for which the data was collected, applicable confidentiality restrictions, and whether any proposed sharing or publication would be consistent with the customer privacy, critical infrastructure, and purpose use limitations that apply to that data.[64]

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[60] *Id.*

[61] *Id.*, at 10.

[62] PG&E Opening Comments at 3.

[63] *Id.*, at 8.

[64] *Id.*

The Sempra IOUs' position closely aligns with PG&E's, emphasizing that improved Commission-CEC coordination must preserve all applicable statutory, regulatory, tariff, and confidentiality protections that govern customer-specific and utility-provided data.[65] The Sempra IOUs support improved interagency coordination but caution that such coordination must preserve all applicable statutory, regulatory, tariff, and confidentiality protections that govern customer-specific and utility-provided data.[66]

SoCalREN states that, "effective coordination among agencies, Program Administrators, and related programs is increasingly important as customers and participants seek to access multiple complementary offerings that support energy efficiency, electrification, demand flexibility, resilience, and other state policy objectives."[67]

3.3.2. Discussion

The DWG Report states that the shared commitments between the Commission, CEC, and the CAISO not only encourage coordination, but necessitate it.[68] The DWG Report also stresses that this is particularly true for DER data access, warning that unexpected or counterproductive outcomes can result if DER devices receive different information or control signals from different sources.[69]

We agree that it is critical to coordinate across agencies on evolving DER data access issues. The Commission will continue working with the CEC and

[65] Sempra IOUs Opening Comments at 12.

[66] *Id.*

[67] SoCalREN Opening Comments at 5.

[68] DWG Report, June 5, 2026 at 86.

[69] *Id.*

CAISO to identify opportunities to improve interagency data coordination. In particular, the Commission will continue to pursue alignment with the CEC on confidentiality requirements, data accessibility, data standardization, and DER distribution market integration.

We agree with SoCalREN regarding the need to coordinate across agencies, program administrators, and related programs. We also agree with Cal Advocates, PG&E, and the Sempra IOUs that the Commission should create a workplan with input from the CEC, IOUs, and other stakeholders to create a data inventory, beginning with a process that identifies what DER-related data each agency already collects, the authority and purpose for which the data was collected, applicable confidentiality restrictions, and whether any proposed sharing or publication would be consistent with the customer privacy, critical infrastructure, and purpose use limitations that apply to that data. Energy Division staff, in consultation with the CEC, IOUs, and other stakeholders, should complete a report on the progress on this task 18 months from the date this decision is issued and serve the report on the service list for this proceeding. The report will include recommendations on next steps in finalizing the inventory and the process to adopt any rules, standards, or policies needed to complete and implement use of the inventory.

3.4. Cost Allocation

The DWG Report did not provide a recommendation for cost allocation. However, parties address cost allocation in response to the ALJ ruling issued on June 12, 2026, which asks how the Commission should allocate costs associated with IOU implementation of new or modified data access requirements arising from this proceeding, as well as what information should be required to demonstrate reasonableness of such costs.

3.4.1. Party Comments

CalCCA recommends that the Commission adopt a set of principles to guide the allocation of data access costs.[70] According to CalCCA, these principles should include: equitable recovery of costs across customers, thoughtful consideration of funding sources, consideration of where and how the value of a data system materializes, when determining who pays for it, in line with principles of cost causation, and determining the cost-effectiveness of a data measure if ratepayer funds are utilized.[71] Similarly, Cal Advocates supports establishing cost allocation principles.[72] Cal Advocates states that the Commission should not treat ratepayers as the default funding source for every new or modified data access requirement adopted in this proceeding.[73]

UCAN suggests that the Commission create a separate phase of this proceeding or a successor proceeding to finalize implementation proposals and assess cost allocation, among other issues.[74]

SCE argues that it is premature to decide how the costs of new or modified data access requirements should be shared until the Commission determines who will pay for them, particularly if costs are shared among multiple utilities and other users.[75] SCE also maintains that utility customers should not pay more than the benefits they receive and should not be responsible for covering costs if other expected funding sources, such as user fees, fall short.[76]

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[70] CalCCA Opening Comments at 15.

[71] *Id.*, at 15 – 16.

[72] Cal Advocates Opening Comments at 22.

[73] *Id.*

[74] UCAN Opening Comments at 19.

[75] SCE Opening Comments at 20.

[76] *Id.*

PG&E recommends that any costs allocated due to these new or modified data requirements should be consistent with Commission cost-recovery precedent and demonstrate ratepayer benefits.[77] PG&E also argues that there should be a concrete implementation record that validates the needs of these systems and also accounts for ongoing and previous authorized data access investments.[78]

3.4.2. Discussion

Several parties support the Commission establishing cost allocation principles for data access activities, particularly the principle of cost causation. However, the Commission finds that these principles are best considered in the context of proceedings addressing the specific cost requests. Accordingly, the Commission will continue to consider which principles, including cost causation and beneficiary-pays, are appropriate when evaluating proposed costs for new or modified data access activities.[79] We therefore decline to adopt cost allocation principles at this time.

3.5. Aggregation Rules for Non-Consented Customer Energy Usage Data

The DWG Report recommends modifications to existing aggregation rules for non-consented data.[80] These recommendations are addressed in the sub-sections below.

3.5.1. Definition of "Usage-Related Data"

The DWG Report recommends that the Commission clarify the scope of "usage-related data" as defined in D.14-05-016, which is billing, program

[77] PG&E Opening Comments at 18.

[78] *Id.* at 19.

[79] The Commission adopted updated electric rate design principles in D.23-04-040, including the principle that rates should be based on cost causation.

[80] DWG Report, June 5, 2026 at 91 - 95. Non consented data refers to data collected, processed, or used without the individual's knowledge, permission or explicit consent.

participation, and account information. Specifically, the DWG Report recommends clarifying that data products derived from usage data, such as energy savings estimates, are also considered usage-related data and are therefore subject to the same confidentiality protections.[81]

3.5.1.1. Party Comments

The Sempra IOUs support the DWG Report recommendation on usage related data, describing the clarification as "foundational to the proper application of the aggregation rules that follow."[82] They also state that public disclosure of program savings is contingent on program administrator approval and must follow established data ownership frameworks, including confidentiality protections and, where warranted, customer consent.[83] PG&E also supports a comprehensive approach to data products derived from usage data.[84]

3.5.1.2. Discussion

The DWG Report recommendations on usage related data raise the question that every rule in Section 3.5 of this decision depends on: which aggregation thresholds apply to what data. D.14-05-016 states that usage-related data includes "all billing data, all program participation data, and account information, including address and climate zone."[85]

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[81] *Id.*, at 97.

[82] Sempra IOUs Opening Comments at 12–13.

[83] *Id.* at 7.

[84] DWG Report, June 5, 2026 at 87.

[85] D.14-05-016, *Decision Adopting Rules to Provide Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data* (May 1, 2014), R.08-12-009, at 110, 137 (Finding of Fact 2).

We agree that all data products derived from customer usage data, including energy savings estimates, constitute usage-related data under the Commission's definition in D.14-05-016, and are subject to the same confidentiality protections. As such, the aggregation rules discussed in Section 3.5 of this decision apply to these derived data.

3.5.2. Default Aggregation Threshold

The DWG Report recommends that the Commission establish a 4/50 default aggregation threshold for the release of customer usage data.[86] Under a 4/50 threshold, aggregated usage data may be made public if the group contains at least four accounts and no one account makes up more than 50 percent of the group's total consumption.[87]

D.14-05-016 set the current aggregation thresholds for mandatory quarterly posting of energy usage data by the IOUs. For the quarterly public postings of monthly energy usage by zip code, the current aggregation rules require at least 100 customers for residential data, and at least 15 customers with no customer above 15 percent of consumption for commercial, agricultural and industrial data.[88] For data provided to local governments via the EDRP process, it set separate thresholds for residential, commercial, and agricultural customers of 15 customers with no customer above 20 percent, and for industrial five customers with none above 25 percent.[89] This discussion addresses the aggregation thresholds for mandatory public posting; thresholds for data requested through the EDRP are discussed below in Section 3.5.5.

[86] DWG Report, June 5, 2026 at 97.

[87] DWG Report, June 5, 2026 at 60.

[88] D.14-05-016 at 26–27, 139–141 (Findings of Fact 15–23); Ordering Paragraphs 1–2.

[89] D.14-05-016 at 142–144 (Findings of Fact 28–34); Ordering Paragraph 5.

The DWG report proposes adopting a 4/50 default aggregation threshold for the public release of customer usage data, applied to residential, commercial, agricultural and industrial customers. The DWG Report states that the threshold "reflects precedents from other states," and asks the Commission to clarify whether a "customer" should be defined by meter, premise or account. Under a 4/50 threshold, aggregated usage data may be made public if the group contains at least four accounts and no one account makes up more than 50 percent of the group's total consumption.

The DWG Report offers four grounds for the recommendation. First, UCLA, the DWG's facilitator, reports that existing thresholds force the redaction, or "masking," of data, which "inhibits analysis in rural areas or for uncommon building types." UCLA's prior analysis of a large volume of real-world usage data found masking more sensitive to the maximum single-customer share than to the minimum number of customers, for cities, counties and customer sectors alike.[90] Second, New York adopted a 4/50 aggregation threshold statewide in 2021, and its Utility Energy Registry requires four meters per aggregate with no share limit.[91] Third, California's benchmarking program publishes building-level energy use for large buildings served by as few as three accounts, and benchmarking programs in other states use four-meter thresholds.[92] Fourth, academic research "has quantitatively tested the privacy protections of different aggregation thresholds in order to identify the optimal account number and

[90] *Id.*, at 58.

[91] *Id.*, at 60.

[92] *Id.*, 60–61.

masking fraction," including a 2018 study by the Pacific Northwest National Laboratory (PNNL).[93]

Some DWG stakeholders point to New York's experience with 4/50 as evidence that the standard has been tested at scale.[94] The DWG Report adds that no DWG participant "pointed to any specific examples of harm or injury from aggregated or anonymized data release in California," or in other states with significantly more permissive rules.[95] It also notes that academic research and benchmarking precedents "have not been tested for industrial sector utility accounts."[96]

3.5.2.1. Party Comments

Of the twelve parties that commented on the June 12 Ruling, two support adopting a 4/50 aggregation threshold (Clean Coalition[97] and SBUA);[98] five ask for further statistical or privacy analysis before any change (PG&E,[99] SCE,[100] Sempra IOUs[101] and Cal Advocates,[102] and one, SoCalREN,[103] supports periodic review without proposing a threshold.

[93] *Id.*, at 62.

[94] DWG Report, June 5, 2026, at 73 -74.

[95] *Id.*, 59.

[96] *Id.*, at 62.

[97] Clean Coalition Opening Comments at 3.

[98] SBUA Opening Comments at 4.

[99] PG&E Opening Comments at 10.

[100] SCE Opening Comments at 8-9.

[101] Sempra IOUs Opening Comments at 9.

[102] Cal Advocates Opening Comments at 11.

[103] SoCalREN Opening Comments at 8.

Clean Coalition recommends replacing the Commission's 15/15/100 aggregation standard with a 4/50 standard. It argues that the current rule withholds data that local and Tribal governments, CCAs, researchers and developers need, particularly in smaller, rural and disadvantaged communities.[104]

SBUA supports a 4/50 standard with case-by-case exemptions and asserts that it provides equivalent privacy protection while increasing data access.[105] SoCalREN does not recommend a specific alternative threshold, but supports periodic review of whether aggregation requirements strike the right balance between privacy and data access.[106]

PG&E opposes a 4/50 standard and argues that the DWG Report offers no statistical evidence that a 4/50 standard would protect California customers; that the relevant unit (meter, account or customer) is undefined; that a four-meter threshold could fail at sites with multiple meters; and that artificial intelligence, machine learning and dataset matching increase re-identification risk.[107] PG&E also argues that the New York examples are narrower and exclude residential data, that California privacy law differs from New York's, and that neutral academic, statistical or privacy experts should review any change.[108]

SCE does not support immediate revision of the aggregation thresholds absent a technically supported privacy risk analysis.[109] SCE identifies customer

[104] Clean Coalition Opening Comments at 1–3.

[105] SBUA Opening Comments at 4.

[106] SoCalREN Opening Comments at 8.

[107] PG&E Opening Comments at 10.

[108] *Id.* at 10–11.

[109] SCE Opening Comments at 8–9.

count, customer class, load dominance, geographic sparsity, temporal granularity, repeated disclosures and dataset linkage as factors to evaluate. SCE also warns that complex rules applied to manual data requests may invite error and asks the Commission to obtain independent technical and privacy consulting support.[110]

The Sempra IOUs do not support a 4/50 standard without "scientific statistical analysis" specific to California showing that it "protects customer privacy as well or better than existing threshold standards."[111] The Sempra IOUs further state that their definitions of "customer" are not synonymous with meter, premise or account, and that redefining those terms would require costly changes to customer information and billing systems.[112] They condition new data requirements on, among other things, "cost recovery certainty."[113] The Sempra IOUs ask that adoption of 4/50 be made "contingent upon scientific evidence demonstrating that such a threshold will not weaken existing protections against re-identification."[114] On geography, they frame the issue as "whether each resulting aggregation cell protects customers from re-identification and whether overlapping datasets can be combined to infer customer-specific information."[115]

Cal Advocates recommends that the Commission not adopt a 4/50 standard and instead build a record with statistical and customer privacy

[110] *Id.*

[111] Sempra IOUs Opening Comments at 13, 16.

[112] *Id.*, at 13.

[113] *Id.,* at 5.

[114] *Id.,* at 4–5.

[115] *Id.,* at 16.

expertise.[116] It acknowledges that a more permissive threshold may be reasonable for some data products, "such as annual or monthly aggregated data for local or Tribal government planning, if the data cannot reasonably identify individual customers and the public-interest benefit is clear."[117]

Cal Advocates proposes six criteria for any revised threshold:

1. The specific data product and use case;
2. Whether the data will be publicly released, shared under the Energy Data Request Program (EDRP) Terms of Service or a non-disclosure agreement, or used only internally by a public agency;
3. The customer class, and whether one or a few customers could dominate an aggregation cell;
4. The temporal granularity of the data;
5. The geographic unit, and whether the data could be combined with other public datasets to identify customers; and
6. The cost and technical feasibility of implementation.

It identifies suppression of cells that fail dominance tests as one supplement to aggregation thresholds, and cites a 2013 Electronic Frontier Foundation (EFF) memorandum for the point that sub-hourly data can reveal appliance use and household activity.[118]

On geography, Cal Advocates recommends that each public data product "use the most useful geographic unit that satisfies applicable privacy protections for that product," and that each product identify its geographic unit, vintage, privacy threshold and suppression rules. It cautions that more granular

[116] Cal Advocates Opening Comments, July 6, 2026 at 11.

[117] Cal Advocates Opening Comments, July 6, 2026 at 11–12.

[118] *Id.*, at 12.

geographies can increase privacy risk "depending on the number and distribution of customers in the aggregation cell."[119]

3.5.2.2. DWG Participant Comments

The DWG Report also summarizes statements by DWG participants on this issue, several of whom are not parties to this proceeding.

Local governments describe the effect of the current thresholds. The City of Chula Vista reported that year-over-year changes in customer counts or usage trigger suppression, that data should be published by jurisdiction rather than zip code, and that complete data matters more to local governments than detailed data.[120] StopWaste reported that current aggregation rules prevent adequate data access for over 70 percent of jurisdictions in PG&E's service territory, and that the rules "disproportionately protect large energy users who already must publicly disclose site-specific energy usage through the CEC's Building Energy Benchmarking Program."[121]

Energy Solutions proposed applying a 15/15 standard to residential data in place of the 100-customer threshold.[122] A representative from EFF raised concern about re-identification from anonymized datasets as artificial intelligence advances, stated that she was not advocating a specific threshold, and stated that she was not aware of any data breaches resulting from users accessing personal information and aggregating it under existing rules.[123]

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[119] *Id.*, at 13–14.

[120] DWG Report, June 5, 2026 at 29–30, 58–59.

[121] *Id.*, at 72.

[122] *Id.*, at 16.

[123] *Id.*, at 36.

In response to a DWG participant's question about whether New York had experienced any privacy issues with the 4/50 rule, a representative from the New York State Energy Research and Development Authority (NYSERDA) stated that no such issues had been reported. The representative also explained that the New York Department of Public Service had reviewed screening profiles before the standard was approved.[124]

3.5.2.3. Discussion

The Commission recognizes the privacy concerns raised by the utilities, Cal Advocates, and EFF's representative to the DWG. Customer usage data is protected by statute and by the Commission's privacy rules, and any revised threshold must keep individual customers from being identified through released data.

The record also shows that the current thresholds withhold much of the data that local governments, researchers and others need, and that the single-customer share limit, more than the customer count, drives that withholding. UCLA researchers analyzed more than 20 million California utility accounts and found that data masking is much more affected by the maximum share of energy consumption allowed for a single large customer than by the minimum number of accounts required in a group.[125] Local governments report the same effect: StopWaste reports that current rules prevent adequate data access for over 70 percent of jurisdictions in PG&E's service territory, and Chula Vista reports that year-over-year changes trigger suppression of data its greenhouse gas inventories need.[126] New York found the same pattern. More than 47 percent of

[124] *Id.*, at 60.

[125] *Id.*, at 58.

[126] DWG Report at 29–30, 58, 72.

the groupings withheld from its Utility Energy Registry contained more than 100 customers, and were withheld because of the share test rather than the count.[127]

On balance, we conclude that further exploration of whether a 4/50 threshold should be applied in California is warranted. The Commission's Energy Division staff is authorized to conduct or commission a study of whether a 4/50 aggregation threshold for the public release of non-consented energy usage data for residential, commercial, agricultural and/or industrial customers would sufficiently protect the privacy of each class of customers. This study should be completed within 18 months of the issuance of this decision and served to parties in this proceeding. After the study is completed and served on parties, Energy Division staff are to conduct a workshop to receive feedback on the study and allow for an informal study stakeholder review process. Following feedback, Energy Division staff are to submit a resolution to the Commission with recommendations for modifications to the aggregation threshold for the public release of non-consented energy usage data for residential, commercial, agricultural and/or industrial customers is appropriate and sufficient to protect the privacy of each class of customers. This draft resolution should be issued no later than six months after the issuance of the study.

While the study proceeds, the existing thresholds in D.14-05-016 should remain in effect. Clean Coalition reports that PG&E applies the 15/15 rule to total monthly load, while SCE and SDG&E could not confirm how they apply it. To ensure consistent application for thresholds across IOUs, the IOUs shall meet

[127] NY PSC, Case 17-M-0315, *Order Adopting Utility Energy Registry Modifications* (issued Aug. 12, 2021) (NY UER Modifications Order) at 21–22.

informally and jointly file a Tier 2 advice letter proposing a standardized method for calculating and applying the 15/15 rule.

3.5.3. Hourly Consumption Data

The DWG Report recommends that the Commission authorize public access to hourly consumption data that meets established aggregation thresholds.

3.5.3.1. Party Comments

The Sempra IOUs oppose the Commission authorizing public access to hourly consumption data that meets established aggregation thresholds. They argue that the benefit of making hourly data publicly available are unclear because hourly meter data reflects both a customer's end-use consumption and the operation of any behind-the-meter DERs.[128] As a result, hourly meter data may not provide an accurate assessment of either end-use consumption or DER performance. The Sempra IOUs would support making aggregated hourly data products at the census tract and census designated place level, only if aggregation standards prevent re-identification and the cost of aggregating at those levels is matched by benefits to ratepayers.[129]

Cal Advocates states that a more permissive threshold that may be reasonable for monthly or annual data may not be appropriate for hourly or sub-hourly interval data. They argue these data present different privacy risks, citing that sub-hourly data can reveal appliance use and household activity.[130] Cal Advocates states that public hourly consumption data and new aggregation thresholds should be further developed before the Commission adopts

[128] Sempra IOUs Opening Comments at 13–14.

[129] *Id.* at 15.

[130] Cal Advocates Opening Comments at 12.

implementation requirements.[131] SCE identifies temporal granularity and repeated disclosures among the factors any revised threshold must address.[132] PG&E and SCE both ask that independent experts review any change to the aggregation threshold and geographic unit combinations.[133]

SBUA supports making aggregated hourly interval energy consumption data products available at census tracts and census designated places, stating that it would provide increased access to data and has been successfully implemented in New York.[134]

3.5.3.2. Discussion

Hourly and sub-hourly data raise questions that cannot be answered based on the record in Track 2 of this proceeding. Therefore, this decision does not adopt the 4/50 threshold for those data. PG&E and SCE ask that any further analysis of whether the 4/50 threshold is sufficient to mask this data be performed by neutral or independent experts.[135] Cal Advocates agrees and similarly asks for statistical and privacy expertise in such an analysis.[136] The Sempra IOUs' comments raise a question regarding the extent to which aggregated data can simultaneously present customer privacy risks and limit the usefulness of this data for DER planning and performance measurement. We agree that there are additional considerations for the accessibility of hourly and sub-hourly data, which this record does not address.

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[131] *Id.* at 8.

[132] SCE Opening Comments at 8.

[133] SCE Opening Comments at 9 and PG&E Opening Comments at 10.

[134] SBUA Opening Comments at 4.

[135] PG&E Opening Comments at 10; SCE Opening Comments at 9.

[136] Cal Advocates Opening Comments at 11.

The Commission's Energy Division should study whether public disclosure of hourly and sub-hourly data under a 4/50 data aggregation threshold or a different data aggregation threshold would sufficiently protect customer privacy. This study should be part of the 4/50 aggregation study authorized in Section 3.5.2 of this decision, and the recommendation of whether to allow public access of hourly and sub-hourly data that meets the aggregation threshold should also be included in the Energy Division staff-initiated resolution.

Together, with the direction provided in Section 3.5.2 regarding the 4/50 aggregation study, we direct the following to be addressed in that study. The Commission's Energy Division is to consider the following criteria for the 4/50 aggregation study, which draw on the factors Cal Advocates and SCE identified and on PNNL's work presented to the DWG:[137]

1. **Defined data products:** Each candidate product shall be specified by interval length, geographic unit, release frequency, and whether it is public or restricted.[138]
2. **Unit of protection:** The protected unit is the customer, counted as in D.14-05-016, over the full period covered by a release or series of releases, not a single interval.[139]
3. **Defined attacks:** The evaluation shall test, for each product:
    i. Inference by the other customers in an aggregated value;

[137] Cal Advocates Opening Comments, July 6, 2026 at 11–12; SCE Opening Comments, July 6, 2026 at 8; DWG Report, June 5, 2026 at 37.

[138] Cal Advocates Opening Comments at 12; SCE Opening Comments at 8.

[139] D.14-05-016 at 119. *See also* J. Near, D. Darais & N. Lefkovitz, National Institute of Standards and Technology, *Guidelines for Evaluating Differential Privacy Guarantees*, NIST SP 800-226 (Mar. 2025) (NIST SP 800-226), cited in DWG Report at 63, n.56 (discussing the "unit of privacy").

ii. Differencing across overlapping or repeated releases;

iii. Linkage with public datasets, including AB 802 benchmarking disclosures, Distribution Generation Statistics Database (DGStats), net energy metering generation data published without aggregation, and census data; and

iv. Time-series signatures that identify appliance, electric vehicle or DER operation.[140]

4. **Quantitative privacy metrics:** Risk shall be measured, not asserted: the rate at which individual load profiles can be matched or recovered from released data, as in PNNL's meter-aggregation analysis, and information-leakage and attack-accuracy measures such as mutual information, relative entropy, and the Matthews correlation coefficient, as PNNL presented to the DWG.[141]

5. **Per-interval dominance:** Dominance tests shall be applied in every interval released.[142]

6. **Data availability:** Each candidate shall be evaluated for the share of aggregated values, jurisdictions and customer classes suppressed, and, where noise is added, the resulting error.[143]

7. **Common baseline:** The existing 15/15/100 standard and each candidate shall be tested under the same attacks and the same data, so that results compare standards rather than studies.

8. **Alternatives to count thresholds:** The evaluation shall consider differential privacy for hourly releases at feeder or larger aggregation, delayed release, and synthetic data. Where differential privacy is proposed, the evaluation shall

[140] SCE Opening Comments at 8; Sempra IOUs Opening Comments at 16; Cal Advocates Opening Comments at 12 & n.16; PNNL-35257 at 26–27.

[141] Livingston 2018 at 305–309; DWG Report, June 5, 2026 at 37, 62.

[142] D.14-05-016 at 26, 34.

[143] NY Data Access Framework Order at 28; DWG Report, June 5, 2026 at 72–73; PNNL-35257 at 32–33.

recommend the privacy-loss parameter and unit of privacy for Commission adoption.[144]

9. **Customer classes:** Residential, commercial, agricultural and industrial customers shall be evaluated separately.[145]
10. **Implementation:** Recommended rules shall be automatable, uniform across utilities, and accompanied by an implementation cost estimate.[146]
11. **Transparency:** Methods and code shall be documented so that results can be reproduced on synthetic data without access to customer data.

3.5.4. Aggregation Thresholds for Program Analysis

The DWG Report recommends that the Commission address how aggregation thresholds apply when customer usage data is published for program evaluation and analysis. Evaluation of ratepayer-funded programs relies on participant-level program and usage data, and the threshold applied to that data determines whether program administrators, evaluators and researchers can publish results.

The DWG Report recommends that the Commission clarify that when customer usage data is published as part of a sample or for programmatic analysis, aggregation thresholds should be based on the number of eligible customers, not just those who participated in the program.[147] This recommendation addresses barriers that make program data difficult to publish, access, and compare due to inconsistent aggregation requirements and thresholds. For example, TECH Clean California applies the 100-customer

[144] DWG Report, June 5, 2026 at 37, 63; PNNL-35257 at 26–33; NIST SP 800-226; Cal Advocates Opening Comments, July 6, 2026 at 12.
[145] DWG Report, June 5, 2026 at 62.
[146] SCE Opening Comments at 8.
[147] DWG Report, June 5, 2026 at 97 - 98.

residential threshold to participants' meter-impact data regardless of geography. Energy Solutions, the TECH program administrator, notes that this prevents it from publishing aggregations and comparing impacts between groups.[148]

Ratepayer-funded program data is spread across the California Energy Data and Reporting System (CEDARS), the DGStats and TECH Clean California. Each platform dataset is prepared using different aggregation or anonymization methods and different geographies. These inconsistencies make it difficult for researchers to conduct comprehensive analyses, particularly at the census tract level, where program data could help evaluate program reach, cost-effectiveness, and relationships between incentives, income, and adoption.

3.5.4.1. Party Comments

The Sempra IOUs do not support clarifying aggregation thresholds for all eligible customers for a program. The Sempra IOUs argue that aggregation thresholds must be based on the customers who are actually part of the data set, not customers who are merely eligible, because eligibility does not mask the usage patterns of the smaller group of participants whose data is analyzed or released.[149] They assert that a utility cannot determine the eligible population for programs it does not administer, so any data set built on that basis would be partial.[150] PG&E also opposes this recommendation and notes that the request to remove this recommendation was not incorporated in the final DWG Report.[151]

Cal Advocates states that a threshold that may be reasonable for monthly or annual data may not be appropriate for project-level program data. They also

[148] *Id.* at 16.
[149] Sempra IOU Opening Comments at 3.
[150] *Id.*
[151] PG&E Opening Comments at 10-11.

state that the Commission should adopt criteria for evaluating revised thresholds rather than one default threshold for all circumstances.[152]

3.5.4.2. Discussion

We decline to adopt the DWG recommendation that data published should be aggregated based on the number of eligible program participants, not just those who participated in the program. The purpose of an aggregation threshold is to protect the customers whose data is included in the overall dataset. For example, a program may have only 10 participants but there may be many other eligible customers in the same zip code who did not participate. Thus, an evaluation that reports the metered usage or savings of those 10 program participants using the aggregation threshold for the entire zip code of eligible customers likely will reveal information about those 10 customers that would have otherwise been protected. We agree with the Sempra IOUs that the threshold must be applied to the customers whose data the release actually contains. This does not prevent a program from reporting the number of participants in an area or the share of eligible customers who participated, which does not disclose customer usage.

3.5.5. Energy Data Request Program for Local and Tribal Government Access

Two issues related to the Energy Data Request Program (EDRP) were addressed in this proceeding: the Terms of Service required for local government access to specified aggregations of customer usage data, and tribal government access to those aggregations. We summarize the EDRP and then address these two issues.

[152] Cal Advocates Opening Comments at 11.

The EDRP process was created by D. 14-05-016 and was originally referred to as the Data Request and Release Process. It applies to all requests for data under the terms of that Decision and establishes the following timelines. Utilities must provide a response to the requestor as to the sufficiency of the request within 7 business days, and within 15 business days, notify both the requestor and the Executive Director whether the request will be granted. The utility cannot release census block-level data until 4 weeks after the notification to the Executive Director. A requestor may take a utility denial of a request to the Energy Data Access Committee (EDAC), which may issue a recommendation for resolving the dispute. There are no timelines associated with EDAC review process. Local governments who receive the specified aggregations of customer use data are required to sign Terms of Service that prohibit release of the data, and all other recipients are required to sign non-disclosure agreements.

The DWG Report recommends that the Commission direct the IOUs to revise the Terms of Service required under D.14-05-016 when local governments access customer usage data through the Energy Data Request Program (EDRP)[153] in Use Case 2.[154] The DWG Report states that the current Terms of Service prohibit local governments from publicly releasing data received through the EDRP. The DWG Report states this is the case even as to annual data sets that are aggregated and anonymized. This means that data otherwise suitable for public reports cannot be released.[155]

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[153] Energy Data Request Program (EDRP) was established by D.14-05-016 and establishes a process that allows researchers, government agencies, and local governments to request access to utility customer energy use data for research, planning, and policy analysis, while maintaining customer privacy protections.

[154] DWG Report, June 5, 2026 at 98. Use Case 2 is Local Government and Tribal Climate Planning.

[155] DWG Report, June 5, 2026 at 58–59, 98.

The DWG Report also recommended the following regarding Tribal Climate Planning:[203]

1. The Commission should amend D.14-05-016 to explicitly authorize Tribal governments to request customer usage data via the EDRP, or any alternative data access processes established through this proceeding, under the same aggregation and anonymization rules applicable to local governments.
2. The Commission should require IOUs to submit quarterly reports to Tribal governments on Tribal liaison engagement activities.
3. The Commission should amend the Terms of Service in D.14-05-016 that require local governments to sign non-disclosure agreements preventing them from publicly sharing non-confidential aggregated data sets received through EDRP.

3.5.5.1. Party Comments on Terms of Service

Cal Advocates' comments support the DWG recommendation to revise the Terms of Service in a targeted manner. It argues that the public reporting restriction applies after the IOU has already aggregated or anonymized the data. Cal Advocates asserts that if the data meets the applicable privacy standard, the Terms of Service should not prevent local governments from using it for the public climate planning purpose that justified the request.[156] Cal Advocates asks the Commission to clarify that the recommendation does not itself change the applicable aggregation standard, and proposes five safeguards: labeling each data delivery as publicly reportable or restricted; limiting public reporting to the approved aggregate data product; continuing to prohibit publication of customer-specific, account-level, premise-level or disaggregated interval data

[156] Cal Advocates Opening Comments at 18–19.

and suppressed cells; prohibiting attempts to re-identify customers by combining data sets; and binding contractors to the same restrictions. It also asks for consistent Terms of Service across the IOUs through a standard template.[157] More broadly, Cal Advocates argues that public data should not be defined by who requests it, and that if a data product is non-confidential, aggregated or anonymized to meet Commission-approved public-release standards, and not reasonably re-identifiable, then the data should be treated as public.[158]

PG&E generally supports the recommendation to the extent it allows properly aggregated or anonymized data to be used in public climate planning and greenhouse gas inventory reports, while preserving purpose limitations, restrictions on re-disclosure, security obligations and safeguards against re-identification.[159] PG&E asks that broader changes to aggregation thresholds be addressed separately and supported by statistical evidence.[160] PG&E states that it would not object to revisiting whether separate standards for public release and for release to local or Tribal governments remain justified, if that review confirms that a single standard would provide equivalent or stronger protection.[161] SCE considers the current Terms of Service appropriately balanced but supports a targeted amendment allowing eligible entities to publish aggregated data sets that satisfy EDRP aggregation and anonymization requirements.[162] The Sempra IOUs support the recommendation provided the

[157] *Id.* at 19–20.
[158] *Id.* at 20–21.
[159] PG&E Opening Comments at 16–17.
[160] *Id.*
[161] *Id.* at 18.
[162] SCE Opening Comments at 18–20.

data meets applicable privacy thresholds and remains subject to purpose limitations, security requirements, restrictions on re-disclosure and accountability for misuse.[163] SBUA supports the recommendation, and SoCalREN supports its general direction.[164]

3.5.5.2. Party Comments on Tribal Government Access

Multiple party comments to the DWG Report supported providing access to tribal governments for customer usage data through EDRP. Cal Advocates recommends that the Commission should explicitly authorize Tribal governments to request customer usage data through EDRP, under the same aggregation and anonymization rules that apply to local governments.[165] SCE also supports allowing Tribal governments to request customer usage data through the EDRP or any successor data-access process established in this proceeding, subject to the same aggregation and anonymization requirements that apply to local governments.[166] Specifically, SCE supports a targeted amendment to the EDRP Terms of Service adopted in D.14-05-016 to allow local governments and Tribal governments to publish public reports, provided that the datasets satisfy applicable EDRP aggregation and anonymization requirements.[167] SoCalREN, SBUA and PG&E all support providing data access to Tribal Governments.[168]

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[163] Sempra IOUs Opening Comments at 15.

[164] SBUA Opening Comments at 6; SoCalREN Opening Comments at 10–11.

[165] Cal Advocates Opening Comments at 20.

[166] SCE Opening Comments at 19.

[167] *Id.*, at 19-20.

[168] SoCalREN Opening Comments at 13, SBUA Opening Comments at 7, and PG&E Opening Comments at 17-18.

The Sempra IOUs do not support the recommendation regarding submitting quarterly reports to Tribal governments. They state that SDG&E has a Tribal liaison that works closely with Tribal governments on a broad range of issues and argues that imposing a new quarterly reporting obligation is not needed.[169] They also state that while SoCalGas does not have a dedicated Tribal liaison, it engages with Tribes in its territory through consistent outreach by its government affairs, outreach, and customer assistance departments.[170] SCE notes that it already maintains a comprehensive outreach and engagement program to support ongoing communication with Tribal representatives in its territory.[171]

3.5.5.3. Discussion

D.14-05-016 requires aggregated yearly, quarterly and monthly data to be shared with local governments under thresholds more restrictive than those it applied to public release: 15 customers with no account above 20 percent of consumption for residential, commercial and agricultural data, five customers with no account above 25 percent for industrial data, and 100 accounts with no account above 10 percent.[172] This is compared with 100 customers for residential data and 15/15 for other classes in public releases.[173] The Terms of Service require a local government to agree not to release the data to another party or

[169] *Id.*
[170] Sempra IOUs Opening Comments at 20.
[171] SCE Opening Comments at 19.
[172] D.14-05-016 at 144 (Finding of Fact 34).
[173] *Id.*, at 26 – 27.

publicly disclose it, but D.14-05-016 provides no rationale for prohibiting the release of datasets that do not compromise customer privacy.[174]

In fact, D.14-05-016 states that,

> *"California law does not prohibit utilities or the Commission from disclosing information that cannot reasonably be linked to a particular customer. Since such data is extremely useful in assessing government energy programs, the Commission directs utilities to fulfill requests by local, city, and county governments and regional governmental entities for* aggregated or anonymized *energy data to fulfill public purposes under the requirements outlined here*."[175]

We agree with Cal Advocates that if a data product meets Commission-approved public-release standards, and is not reasonably re-identifiable, then the data should be treated consistently as public. For this reason, we remove the requirement that requestors sign Terms of Service that prevent release of the datasets. To the extent that unusual circumstances create a situation in which the thresholds may not be protective in a specific aggregation, the EDRP process will allow them to be flagged for further review before they are released.

Similarly, because we conclude that the aggregations currently available to local governments under the terms of D.14-05-016 are unlikely to disclose protected information, we expand the availability of those aggregations to both tribal governments and the general public, using the existing EDRP processes. Data provided in response to these requests should use the same aggregation and anonymization rules currently applicable to local governments. We amend the requirements found in Attachment A to D.14-05-016, and adopt those found in Attachment 1 to this Decision. The amended requirements reflect the availability of specified aggregations to local governments, tribal governments,

[174] *Id.*, at 86, 112.

[175] D.14-06-016 at 32.

and the general public without imposing a confidentiality requirement. They also provide deadlines for EDAC review and recommendations in the event that a dispute over access to these aggregations is raised. Specifically, where a third party brings a dispute regarding access to data pursuant to Section 3.5.5 of this Decision to the Energy Data Access Committee, the Energy Data Access Committee shall meet within 2 weeks of receipt of the dispute and make a recommendation on access to the requested data within 4 weeks of receipt of the dispute.

We do not adopt, at this time, the DWG Report recommendation that IOUs submit quarterly reports to Tribal governments on Tribal liaison engagement activities. The electric IOUs have designated Tribal liaisons, and all IOUs must comply with the Commission's Tribal Consultation Policy adopted in D.26-09-072. We find that the existing framework provides a foundation for Tribal engagement and consultation. Rather than impose an additional quarterly reporting requirement at this time, Commission staff should evaluate whether additional reporting requirements are warranted based on implementation experience and any identified gaps in transparency, accountability, or Tribal engagement. The Commission may consider additional reporting requirements in the future, as appropriate. The Commission's Office of the Tribal Advisor shall serve the list maintained by the Office of the Tribal Advisor with this decision and highlight the provisions of the decision that specifically address tribes.

Each utility shall include the EDRP tariff changes that follow directly from this section in a Tier 1 advice letter, and the utilities shall include an updated uniform template for restricted EDRP data in a joint Tier 2 advice letter. The Tier 1 advice letters shall be filed within 60 days of the adoption of this decision, and

the joint Tier 2 advice letter shall be filed within 90 days of the adoption of this decision. The Tier 1 and Tier 2 Advice Letters shall be served on local governments and the list maintained by the Commission's Office of the Tribal Advisor.

3.5.6. Alignment of Anonymization and Aggregation Rules and Thresholds Across Programs and Platforms

The DWG Report recommends that the Commission revise and unify anonymization and aggregation rules and thresholds for the public release of ratepayer-incentivized DER, energy efficiency, and building electrification program data across all data platforms, including CEDARS, DGStats, and TECH Clean California.[176] Specifically the DWG Report states that the current misalignment of anonymization rules across these platforms limits cross-platform analytical opportunities and impedes program evaluation. The DWG Report recommends the Commission establish that anonymized usage related and program data may be made available at the individual record or project level, with the associated census tract identified. This level of granularity could replace coarser identifiers such as ZIP code or climate zone, and the policy should apply to all current and future publicly available anonymized program datasets.[177]

3.5.6.1. Party Comments

SBUA supports the DWG recommendation to revise and unify anonymization rules and aggregation thresholds.[178] The Sempra IOUs comment that they cannot support this without assurance that customer privacy will be

[176] DWG Report, June 5, 2026 at 98.

[177] *Id* at 98.

[178] SBUA Opening Comments at 4.

protected from re-identification. They argue that census tract data does not benefit ratepayers enough to justify its cost, because census tract is not data that the Sempra IOUs have now linked to premises.[179] The Sempra IOUs also state that they do not have census tract mapping of program data in their customer data systems; that developing it would require time, resources and cost recovery; that program data can already be parsed by zip code; and that researchers "can already reflect zip code data in census tracts using available geospatial (GIS) programs on their own."[180] They also caution against a single standard geographic unit, because customer density, class composition and DER adoption vary across reporting areas, and state that the relevant question is whether each resulting aggregation cell protects customers from re-identification and whether overlapping data sets can be combined to infer customer-specific information.[181] SCE also does not support adopting a standard geographic unit, or applying one across all platforms, without further study, because aggregation size and locational granularity are interdependent privacy variables.[182]

PG&E supports examining census tracts, census designated places or other boundaries for aggregated reporting, provided each reporting unit includes enough customers to prevent re-identification, including when data sets are combined.[183] Cal Advocates recommends a standardized geographic reporting framework with a menu of units, including census tract, under which each public data product uses the most useful unit that satisfies applicable privacy

[179] Sempra IOUs Opening Comments at 15.

[180] *Id.* at 7–8.

[181] *Id.* at 16.

[182] SCE Opening Comments at 8–9.

[183] PG&E Opening Comments at 4.

protections and identifies its unit, vintage, threshold and suppression rules. According to Cal Advocates, census tract data allowed researchers to find relationships between incentives, income and solar adoption that coarser data did not, but cautions that census tract should not become the default geography for every data product.[184] SoCalREN supports considering standardized geographic units where they improve consistency, comparability and usability, subject to evaluation of feasibility, cost and privacy.[185]

3.5.6.2. Discussion

We agree there is an underlying problem as described in the DWG Report and agree with the recommendation that seeks to resolve the problem. The problem identified is that the misalignment of anonymization rules and geographic definitions across programs make analysis and comparison of ratepayer funded programs challenging. Ratepayer-funded program data is published through CEDARS, DGStats and TECH Clean California under different rules and using different geographies. CEDARS publishes anonymized program records with climate zone and disadvantaged community census tract; DGStats publishes anonymized records with city, county and zip code; and TECH applies the 100-customer residential threshold.[186] The misalignment prevents analysis across programs. More granular census tract-level data allows researchers to better evaluate where programs are reaching customers, identify disparities in participation across communities, and examine how factors such as income and other socioeconomic characteristics relate to program adoption.[187]

[184] Cal Advocates Opening Comments at 13–14.

[185] SoCalREN Opening Comments at 8–9.

[186] DWG Report, June 5, 2026 at 70.

[187] *Ibid.* at 59, 70; Cal Advocates Opening Comments at 14.

We also recognize that program-specific data requirements continue to be considered in multiple Commission proceedings. We encourage the Commission's Energy Division staff to continue to consider opportunities to align data publication requirements, including anonymization and aggregation rules, when developing and analyzing proposed requirements. Specifically, the Energy Division staff should consider whether and how to establish consistent geographic granularity and masking standards across program reporting, which would address existing discrepancies between gas system data (published at the census tract level under R.24-09-012) and program data like CEDARS (climate zone) and DG Stats (zip code) through a workshop. ED staff may file a workshop report that includes staff recommendations to the Commission on rule changes that will address the identified problem.

3.5.7. Aggregated Hourly Census Level Data

The DWG Report recommends that the Commission and the CEC should move toward making aggregated hourly interval energy consumption data products available at census tracts and census designated places (CDPs).[188] This decision does not adopt this recommendation at this time.

3.6. Data Access and Priority Use Cases

The DWG Report identifies five priority use cases as follows:

1. CAISO short-term load forecasting and EE[189]/BE[190]/DER program coordination.
2. Local government climate and energy planning.

[188] DWG Report, June 5, 2026 at 98.

[189] EE means Energy Efficiency.

[190] BE means Building Electrification.

3. Participation of customers who do not have online utility accounts and/or live in multi-family buildings enrolled in third-party ratepayer funded EE/BE/DER programs.
4. DER adoption by improving information available for DER siting in Integration Capacity Analysis and Data Portals.
5. Expand and enhance Tribal government data access for climate and energy planning.

The DWG Report recommends that the Commission adopt the five priority use cases as a framework for near-term action.

3.6.1. Party Comments

CalCCA proposes a seven-factor test for sequencing action on the priority use cases: population scale, effort required, economic impact, alignment with state and local goals, timing, and breadth of impact.[191] UCAN, in reply comments, proposes a five-factor test: ratepayer value, whether the data already exists and is validated, whether proven solutions exist, proceeding fit, and urgency.[192]

PG&E identifies the Tribal data access use case as the most immediately actionable, because it requires only an amendment to D.14-05-016 and no new infrastructure.[193] SBUA urges simultaneous action on all five use cases and asks that hard-to-reach customers, customers in disadvantaged communities, and small and diverse businesses be more explicitly addressed.[194] SCE,[195] Sempra

[191] CalCCA Opening Comments at ii.

[192] UCAN Reply Comments at ii; Opening Comments at 12–14.

[193] PG&E Opening Comments at 3.

[194] SBUA Reply Comments at 2.

[195] SCE Opening Comments at 4.

IOUs,[196] and Cal Advocates[197] ask that explicit benefit-cost criteria be applied before the utilities are required to act, particularly for use cases that depend on new infrastructure.

3.6.2. Discussion

It is reasonable to adopt the five priority use cases recommended by the DWG Report as a framework for near-term action. The priority use cases identified provide concrete, stakeholder-informed data needs and opportunities to improve the usefulness of ratepayer-funded program data for research, planning, and evaluation. Consistent with the common factors underlying the proposals of CalCCA and UCAN, we will evaluate each use case on a case-by-case basis for its ratepayer value, the readiness of the data, and the cost of implementation, rather than adopting either party's recommended scoring test as a formal methodology.

Of the five use cases, we agree that expanding Tribal government data access for climate and energy planning meets these factors now, because it requires only an amendment to D.14-05-016 and no new data infrastructure.

This decision addresses the priority use cases as follows. The first use case, "CAISO short-term load forecasting and EE/BE/DER program coordination," is addressed in the discussion of data governance and interagency coordination in Section 3.3; the second use case, "local government climate and energy planning," and fifth use case, "expand and enhance Tribal government data access for climate and energy planning," are addressed in Section 3.5.5; the third use case, "participation of customers who do not have online utility accounts and/or live in multi-family buildings enrolled in third-party ratepayer funded

[196] Sempra IOUs Opening Comments at 5.

[197] Cal Advocates Opening Comments at 7.

EE/BE/DER programs," is addressed in Section 3.8; and the fourth use case, "DER adoption by improving information available for DER siting in Integrated Capacity Analysis and Data Portals," is addressed in Section 3.7.

3.7. Distribution Grid and DER Siting

The DWG Report recommends the following regarding the distribution grid and DER siting.[198]

1. The Commission should continue to evaluate any constraints associated with requiring IOUs to provide a mapping of customer premises to the associated distribution circuit, feeder line, and substation, and identify conditions under which this information could be made accessible through Integration Capacity Analysis (ICA) and related data portals. Currently, DER developers and local governments cannot determine which circuit serves a given premise until after submitting and inter-connection application, leading to incorrect sizing and unanticipated costs related to capacity constraints. This mapping does not require disclosure of customer-level consumption data or behavioral information and presents minimal privacy risks.
2. The Commission should require the IOUs to expand the scope of data reported in Interconnection Reports. At a minimum these reports should include:
    i. Information on rejected or withdrawn interconnection applications and the reason for the rejection; and
    ii. Data on previously interconnected but now decommissioned DER systems.

3.7.1. Party Comments

Cal Advocates mentions siting in relation to aggregation stating that DER siting or grid planning use cases may need feeder, circuit, or substation

[198] DWG Report, June 5, 2026, at 99 -100.

information, that may raise operational, security, and privacy concerns.[199] CalCCA urges the Commission to prioritize the DWG Report recommendation [200]on distribution grid and DER siting. According to CalCCA, adopting this recommendation would allow siting of DERs to support optimal grid operations.[201] 350 Bay Area also supports CalCCA's recommendation that the Commission prioritize the DWG Report's recommendations regarding DER siting improvements.[202]

The Sempra IOUs oppose this recommendation on DER siting stating that "DER system designers seeking maps linking customer addresses to circuits, feeders and substations risk sensitive confidential information (being revealed) without explicit customer consent."[203]

PG&E argues that the Commission should not consider DER siting and integration capacity analysis in this proceeding because they are already being addressed in R.21-06-017.[204] UCAN also cites the work in R.21-06-017 and states that there needs to be coordination to address documented gaps regarding siting information.[205]

AEU urges the Commission to consider all priority use cases identified in the DWG Report on a portfolio basis and weigh the aggregate benefits against the incremental costs of shared infrastructure or standards. They state this approach should be evaluated relative to the costs each IOU would incur to

[199] Cal Advocates Opening Comments at 13.
[200] CalCCA Opening Comments at 9.
[201] *Id.*
[202] 350 Bay Area Reply Comments at 6.
[203] Sempra IOU's Opening Comments at 10.
[204] PG&E Opening Comments at 7–8.
[205] UCAN Reply Comments at 23.

independently build, maintain, and periodically upgrade parallel systems to address the same needs individually.[206]

3.7.2. Discussion

We agree that access to distribution grid and DER interconnection data can provide benefits for local governments, tribal governments, and market participants. As the DWG Report explains, the inability to identify the distribution circuit, feeder, or substation serving a particular premise can create uncertainty for DER developers and lead to inefficient project design, unexpected interconnection costs, and delays. Similarly, more comprehensive interconnection reporting, including information on rejected and withdrawn applications and decommissioned DER systems, could provide valuable insight into distribution grid constraints and opportunities for additional DER deployment.

At the same time, we recognize the concerns raised by the Sempra IOUs regarding the potential disclosure of sensitive information through mapping customer premises to specific distribution grid infrastructure. Although this mapping does not necessarily require disclosure of customer level energy consumption or behavioral data, the Commission must also consider potential operational security and confidentiality implications. Accordingly, the appropriate level of data granularity, applicable access restrictions, and safeguards should be evaluated before establishing broader data sharing requirements.

We also recognize that issues related to DER siting and Integration Capacity Analysis (ICA) overlap with ongoing Commission efforts directed in

[206] AEU Opening Comments at 8-10.

Rulemaking (R.) 21-06-017. We agree that coordination across proceedings is important to avoid duplicative requirements and ensure that identified data gaps are addressed consistently. In addition, implementation of Senate Bill (SB) 905 (Becker), Chapter 985, Statutes of 2026, which requires the availability of data quantifying the potential for increased utilization of segments of the electrical distribution grid, may provide an additional opportunity to advance aspects of the DWG Report's recommendations.

For these reasons, we will continue to evaluate the DWG Report's recommendations on DER siting and interconnection data on a case-by-case basis in the appropriate proceedings, taking into account the potential benefits to ratepayers and DER deployment, the sensitivity and security implications of the requested data, existing data-sharing efforts, and the costs of implementation. This approach will allow the Commission to consider opportunities to improve access to distribution grid data while coordinating with existing initiatives and maintaining appropriate protections for sensitive information.

3.8. Multifamily and Underserved Customer Access to Data

The DWG Report recommends the following regarding multifamily and underserved customer access.[207]

1. The Commission should facilitate establishing an alternative data access pathway for third-party market incentive program implementers that receive IOU ratepayer funds to request customer-level interval data in cases where individual tenant consent or online access is not feasible.

This data includes:

i. Peak kW or peak 15-minute electricity consumption over the prior 12 months for individual or multiple meters at a

[207] DWG Report, June 5, 2026 at 100.

given site, with property owner authorization for multifamily buildings; and,

ii. Electricity consumption data for customers who have not established an online utility account, with a signed customer consent authorization form.

The DWG Report finds that third-party market incentive program implementers can access a customer's usage data only if the customer provides consent through a Share My Data portal. For multifamily tenants who do not provide consent, the only alternative is access to aggregated, whole-building data under AB 802. The DWG Report also finds that customers without online accounts have no pathway to provide access to their usage data.[208]

The DWG Report's multifamily use cases explain why access to this information is important. Implementers and DER system designers need peak demand and 15-minute interval data to plan building retrofits and electrification projects, including determining whether existing electrical infrastructure can accommodate additional loads. Implementers also need tenant-level 15-minute interval data to conduct energy modeling.[209]

3.8.1. Party Comments

SBUA's comments support DWG Report recommendation to facilitate an alternative data access pathway for program implementers, while SoCalREN's comments describe the data access barriers that affect multifamily and underserved customers.[210] PG&E and the Sempra IOUs oppose the DWG recommendation as proposed. Cal Advocates' comments address customer-specific usage data among other matters.

[208] DWG Report, June 5, 2026 at 74.

[209] *Id.*

[210] SBUA Opening Comments at 2, SoCalREN Opening Comments at 12.

SBUA supports the DWG Report's recommendation that the Commission facilitate an alternative data access pathway for third-party market incentive program implementers, and asks that the pathway also include small and diverse businesses.[211] Clean Coalition's comments on the draft DWG Report state that improving data access at multifamily sites will increase program participation.[212] On cost allocation for this data access, PG&E and Cal Advocates each state that costs that primarily benefit a specific third party, such as a program implementer or other market participant, should be considered for assignment to the requesting or benefiting entities rather than recovered from ratepayers generally.[213]

SoCalREN states that its residential programs target and prioritize multifamily properties in disadvantaged and hard-to-reach communities. In this context, SoCalREN states that both property owners and renters may face participation barriers, and that its commercial programs serve disadvantaged and hard-to-reach small and medium businesses that have difficulty providing utility bills at enrollment.[214] According to SoCalREN, data access that is not timely, consistent, and predictable impacts program launch, participant identification, eligibility verification, and project development.[215] SoCalREN asks the Commission to standardize data-sharing agreements, improve the timeliness and predictability of data request fulfillment, and clarify access to the data needed for eligibility verification and participant screening, while maintaining

[211] SBUA Opening Comments at 2.

[212] Clean Coalition Opening Comments at 1.

[213] PG&E Opening Comments at 19; Cal Advocates Opening Comments at 22.

[214] SoCalREN Opening Comments 11–12.

[215] *Id.*, at 11.

appropriate customer privacy protections.[216] SoCalREN states that it does not recommend weakening customer privacy protections.[217]

The Sempra IOUs state that they support reducing participation barriers for low-income, multifamily, and underserved customers but do not recommend weakening customer authorization requirements for customer-level interval data.[218] They warn that low-income customers may be particularly vulnerable to targeted or high-pressure marketing if data is disclosed to third parties without clear consent, purpose limitations, and accountability controls, and they ask that DWG recommendation on this topic be augmented to state that: "Such pathway may not weaken customer authorization requirements for customer-level interval data."[219] PG&E's comments mention that the DWG Report did not incorporate this requested change.[220]

The Sempra IOUs oppose treating this DWG recommendation as a priority use case. They argue that the recommendation would require providing customer-level data to third parties without customer consent where the third party is not working on behalf of the IOU, in violation of the Commission's privacy rules. The Sempra IOUs assert that they already provide data to ratepayer-funded third-party implementers for a primary purpose under those rules.[221] Finally, they also assert that the current privacy rules, which require

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[216] *Id.,* at 12.

[217] *Id.,* at 13.

[218] Sempra IOUs Opening Comments at 7.

[219] *Id.*

[220] PG&E Opening Comments at 2.

[221] D.11-07-056, Attachment D, Rule 1(c) (at 151), defines the "primary purposes" for the collection, storage, use or disclosure of covered information as to "(1) provide or bill for electrical power or gas, (2) provide for system, grid, or operational needs, (3) provide services as

Footnote continued on next page.

customer consent for an IOU to provide data to third parties not working directly for that IOU, continue to apply.[222] The Sempra IOUs also oppose being ordered to provide data to any company or individual that simply claims to be a "DER provider."[223] More generally, they state that a use case should proceed only where the requester has identified the precise data needed, the granularity and frequency required, the public-interest purpose, the reason existing pathways are insufficient, the privacy and cybersecurity safeguards, and the expected ratepayer benefit.[224]

PG&E opposes the recommendation and raises four objections. First, PG&E states that its systems identify multi-unit dwellings but cannot show whether a customer rents or owns, or is a roommate, so the recommendation's assumption that tenants can be identified cannot be implemented.[225]

Second, PG&E argues that whether online account access is "feasible" for a customer is not something the Commission or a utility can judge, and that customers, whether tenants or not, may have their own reasons for not creating online accounts.[226]

Third, PG&E contends that the recommendation conflicts with Public Utilities Code Section 8380, under which an IOU may not share, disclose, or

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required by state or federal law or as specifically authorized by an order of the Commission, or (4) plan, implement, or evaluate demand response, energy management, or energy efficiency programs under contract with an electrical corporation, under contract with the Commission, or as part of a Commission authorized program conducted by a governmental entity under the supervision of the Commission." Any other purpose is a "secondary purpose." Id. See also PG&E Electric Rule 27, § 1(c)–(d).

[222] Sempra IOUs Opening Comments at 9–10.

[223] *Id.*, at 10.

[224] *Id.*, at 11.

[225] PG&E Opening Comments at 21.

[226] *Id.*, at 21–22.

otherwise make accessible to a third party a customer's electric consumption data without the customer's consent, with limited exceptions.[227] PG&E acknowledges that Section 8380(f)(2) permits disclosure to a third party for the implementation of demand response, energy management, or energy efficiency programs where the utility has required by contract that the third party maintain reasonable security procedures and not use the data for a secondary commercial purpose without the customer's consent. It argues, however, that this exception would not reach the recommendation's third-party implementer, because the DWG Report does not define "third-party market incentive implementer" and an implementer that is not working for the IOU could use the data for its own commercial purposes.[228] PG&E also acknowledges that Section 8380(f)(3) and its Electric Rule 27 permit disclosure of customer consumption data as required by Commission order, but argues that any such order must still comply with California law protecting personal information against disclosure without the customer's prior consent, and that the Commission cannot require the IOUs to take actions that conflict with applicable law.[229]

Fourth, PG&E characterizes the recommendation as a waiver of prior customer consent for tenants on the ground that lack online accounts, and argues that this rationale does not justify treating tenants differently from other customers, and that removing confidentiality protections because a customer has no online account is inconsistent with customers' right to manage access to their meter data without using online accounts. [230]

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[227] *Id.*, at 21.
[228] *Id.*, at 21–22.
[229] *Id.*, at 22.
[230] *Id.*

Cal Advocates does not address the recommendation directly but states that use cases involving customer-specific usage data, interval data, or tenant-level data are less suited to near-term action than those involving aggregated or anonymized data. Additionally, according to Cal Advocates, where customer-specific data is involved, the Commission should require customer consent unless a statute, regulation, or Commission decision clearly authorizes access without consent for the specific requester and purpose, with appropriate confidentiality, cybersecurity, and re-disclosure limits.[231] Cal Advocates recommends that access to customer-specific or tenant-level data be addressed in a second proceeding phase, after use-case-specific showings on need, cost, privacy, cybersecurity, legal authority, alternatives, and ratepayer benefit.[232]

3.8.2. Discussion

The DWG Report and party comments reflect a gap in access to interval data for implementers of programs serving multifamily buildings and customers without online accounts. Existing pathways meet part of that need but do not close the gap.

The DWG Report includes a concrete example that illustrates the need for an alternative data access pathway. The Association for Energy Affordability (AEA), a nonprofit that provides technical services for affordable housing, explained that it can obtain only anonymized whole-building data through AB 802, and that obtaining meter-level data for individual tenants requires a utility bill authorization from each tenant. AEA needs peak kW or 15-minute interval data for the prior year to analyze a building's electrical capacity for electrification

[231] Cal Advocates Opening Comments at 8.

[232] Cal Advocates Opening Comments at 24.

upgrades, and meter-level data to understand each unit's usage and its contribution to the building's peak demand.[233] AEA proposes that a stakeholder be able to request peak kW or peak 15-minute consumption for each meter or all meters at a building, identified by meter numbers or addresses, either as an anonymized aggregate of two or more units or at the individual-meter level, without an authorization form from each account holder.[234] SCE responds that historical 15-minute data for residential customers is not always available, and that it does not measure or retain kW demand for residential customers, who are not demand-billed. The DWG Report concludes that an alternative pathway is necessary that requires neither individual tenant consent nor an online account.[235]

The DWG Report states that AB 802 data are available only for buildings over 50,000 square feet with 17 or more utility accounts.[236] Specifically, AB 802 requires each utility, on the written or secure electronic authorization of the owner, owner's agent or operator of a covered building, to deliver aggregated energy usage data for the building. For a covered building with three or more active accounts, the aggregated data are not confidential information for purposes of delivery to the owner, and no customer consent is required.[237] Under the CEC's regulations, a building with residential accounts is covered if it has five or more active accounts of one energy type, and condominium projects are

[233] DWG Report, June 5, 2026 at 13.

[234] *Id.*, at 75.

[235] *Id.*

[236] *Id.*, at 74.

[237] Pub. Resources Code § 25402.10, subds. (c)(1), (c)(2)(A).

excluded.[238] The 50,000-square-foot and 17-account thresholds determine which buildings must be benchmarked and publicly disclosed, not which buildings may receive data.[239] The limit that matters here is different. AB 802 data are whole-building totals, aggregated monthly unless the CEC specifies otherwise.[240] They do not supply the peak, interval, or individual-meter data that implementers need for electrification design.

The Sempra IOUs' comments do not identify any pathways that serve customers without online accounts and third-party implementers not under direct contract with the IOU. The Sempra IOUs' comments state that they already provide data to ratepayer-funded third-party implementers for a primary purpose, and that customer consent is required for third parties "not working directly for the specific IOU."[241] PG&E likewise states that the contract exception in Public Utilities Code Section 8380(f)(2) covers contractors retained to perform the IOU's own program responsibilities, and would not extend to a third-party implementer that is not working for the IOU.[242] Taken together, these statements describe an exception that depends on a contract with the particular IOU that holds the data.

The Commission has closed parts of this gap before. In D.23-02-002, the IOUs argued that sharing disaggregated data with RENs required an explicit Commission order. The Commission found it reasonable and necessary for RENs and third-party implementers to have that data, including individual non-

[238] Cal. Code Regs., tit. 20, § 1681, subd. (c); § 1682, subd. (b)(4).

[239] Cal. Code Regs., tit. 20, § 1681, subd. (d); Pub. Resources Code § 25402.10, subd. (d)(1).

[240] Pub. Resources Code § 25402.10, subd. (c)(2)(D).

[241] Sempra IOUs Opening Comments at 10.

[242] PG&E Opening Comments at 21–22.

participant meter data, to implement ratepayer-funded energy efficiency programs, and ordered the IOUs to provide it.[243] The IOUs must share the data within ten days after notifying a requester that it has a current cybersecurity review and a non-disclosure agreement with each IOU supplying data, can receive secure transmissions, and holds a current program contract with a statement of work that requires the data.[244]

In D.21-11-002, the Commission directed the IOUs to share participant and non-participant data with the implementers and evaluators of the TECH Initiative, the BUILD Program and the WNDRR Program. It noted that an earlier decision let those implementers sign one NDA with the Commission "instead of signing multiple NDAs with each IOU," and found that "disparate NDA terms or lack of standardized data terms across utilities may create a logistical burden" and that a standardized NDA was "desirable and necessary."[245] The privacy rules also permit an IOU to disclose covered information without customer consent to a governmental entity providing energy efficiency services under a Commission order, and the rules for CCAs treat energy efficiency and demand response work under contract with a CCA as a primary purpose.[246]

These pathways do not close the gap as D.23-02-002 and D.21-11-002 are limited to specific programs.[247] No existing pathway serves an implementer that a property owner retains to deliver a program, or a customer who has no online account.

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[243] D.23-02-002 at 62–63; Conclusion of Law 30 (at 78).

[244] D.23-02-002, Ordering Paragraph 19 (at 83–84).

[245] D.21-11-002 at 74–76, 79; Ordering Paragraph 3 (at 113).

[246] D.11-07-056, Attachment D, Rule 6(c)(1) (at 157); D.12-08-045, Attachment B, Rules 1(c)(4), 6(b)–(c) (at B2, B6–B8).

[247] D.23-02-002 at 3, 63; D.21-11-002 at 74–76.

We agree with parties on the need to address the gap in access to interval data for program implementers who serve multifamily low-income residents, who are disproportionately affected by the current requirement for individual online account consent. We also acknowledge that there is more work to be done to develop this pathway in a way that protects the privacy of these low-income residents and avoids creating unnecessary barriers and delays for program implementers.

The Commission will continue to examine how to establish an alternative data access pathway for third-party market incentive program implementers that receive IOU ratepayer funds and need customer-level interval data to support program delivery, particularly in multifamily buildings where individual tenant consent or online account access may not be feasible. As part of this effort, the Commission may consider whether an authorization framework similar to those adopted in D.23-02-002 and D.21-11-002 could be adapted to address these circumstances, including standardized data access requirements, appropriate documentation of an implementer's program responsibilities, and consistent privacy and cybersecurity protections across the IOUs. Such a framework could allow qualified implementers to request the specific interval data necessary to assess building energy use, peak demand, and electrification opportunities without requiring separate online account authorization from every tenant, where appropriate safeguards for disclosure are established.

3.9. DER Distribution Market Integration

The DWG Report recommends the following regarding DER Distribution Market Integration.[248]

[248] DWG Report, June 5, 2026 at 100 – 101.

1. The Commission in close coordination with CEC, CAISO, IOUs, CCAs, and third-party aggregators, should develop a clear long-term vision for how DER devices will be controlled, whether through command-and-control orchestration, market-based price signals, or a hybrid of the two.
2. The Commission, in close coordination with CEC, CAISO, IOUs, CCAs and third-party aggregators, should develop strategies to reduce the risk of duplicative or misaligned DER control signals that could compromise bulk power or distribution system reliability.
3. The Commission, in partnership with the CEC, CAISO and the IOUs, should continue to jointly assess current exposure to this risk and report findings and proposed mitigations within 12 months.

3.9.1. Party Comments

PG&E asserts that the DWG Report recommendation on DER Distribution Market Integration is outside the scope of the DWG.[249] CalCCA supports exploring a demand flexibility market platform and mention that there are ways to implement, a market platform, consistent with an IOU-led DER orchestration framework in R.21-06-017.[250] UCAN supports the prioritization of this DWG Report recommendation.[251] However, like CalCCA, UCAN suggests that these issues should be addressed in R.21-06-017.[252]

3.9.2. Discussion

The Commission adopted D.26-10-054 which directs the large electric IOUs to retain a consultant to lead a series of working group meetings and

[249] PG&E Opening Comments at 5.

[250] Cal CCA Opening Comments at 9.

[251] UCAN Opening Comments at 3.

[252] *Id.*, at 22.

subsequently propose a common DER orchestration framework via joint application based on the working group meetings and report. The joint application will address the following goals: (a) develop a comprehensive, common proposal defining grid services and use cases for DER orchestration; (b) establish open, interoperable communications for improved DER visibility and behind-the-meter grid services; (c) identify distribution-level flexibility dispatch mechanisms; (d) enable DER visibility to the California Independent System Operator and allowing for transmission system operator-distribution system operator coordination; and (e) define performance metrics, evaluating existing pilots and new use cases, and establishing scaling criteria. This effort will include consideration of issues overlapping with the DWG Report's recommended issues, including developing a framework for how DER devices will be controlled and how to support operational reliability. As such we do not take action here and will continue to address these issues through the actions ordered in D.26-10-054.

We encourage parties to this proceeding and other stakeholders of the DWG to participate in the working group process and proceedings that will inform the IOUs' joint DER orchestration framework application.

3.10. Interval Data Delivery to CCAs

The IOUs are responsible for producing and managing metered interval data, which supports a range of essential utility functions, including billing, rate recovery, grid management, and demand-side program operations. This data is also important to entities outside the IOUs, including other load-serving entities such as CCAs. The IOUs must therefore manage the quality and delivery of interval data to meet the needs of both their own operations and external users.

The DWG Report does not make recommendations about improving IOU interval data delivery to CCAs. However, CalCCA and UCAN raise this issue in their comments, which we address here.

3.10.1. Party Comments

CalCCA's opening comments emphasize the need to improve CCA access to timely, accurate, and completed interval customer usage data.[253] CalCCA also describes how inaccurate, out-of-date, and missing integration capacity analysis data persistently limit CCA's and aggregators' ability to strategically deploy DERs to maximize grid benefits, lower resource adequacy costs, reduce customer bills, and avoid unnecessary grid investments.[254] Other negative impacts from poor data from CalCCA's comments include impacts on CCAs' ability to implement dynamic pricing by the CEC's 2027 Load Management Standards deadline, and note that CCAs serve more than 15 million customers, roughly one-third of CAISO's load.[255]

CalCCA also asked that the DWG Report describe the role of CCA data managers, such as the Sacramento Municipal Utility District and Calpine, which act as the CCAs' agents, operate under the same nondisclosure, security, and privacy requirements, and require the same level of access to data as the CCAs.[256] CalCCA's requests that the Commission prioritize DER program enrollment data sharing between the CCAs and the IOUs and noted that this recommendation falls within the scope of the Demand Response proceeding (R.25-09-004).[257]

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[253] CalCCA Opening Comments at 6 – 7. (*see* also DWG Report, June 5, 2026 at 107)
[254] *Id.*, at 9.
[255] *Id.* at 7, 10.
[256] *Id.* at 5.
[257] *Id.*, at 8.

Another priority from CalCCA's comments is to have the IOUs correct deficiencies with existing Share My Data (SMD) platforms, which are based on AMI 1.0 systems.[258] Finally CalCCA urges the Commission to work with the IOUs to ensure that AMI 2.0 deployments do not inherit the same deficiencies that hinder access to interval data.[259]

Both CalCCA and UCAN highlight the need for the Commission to act on the provision of timely access to accurate and complete data.[260] UCAN recommends that the Commission require utility provision of data to CCAs and authorized third parties on a lagged basis of up to, but not exceeding, 24 hours. UCAN pointed to the DWG Report's finding that each IOU validates AMI interval data daily, and to the gap between SCE's delivery of raw usage data to CCAs within 24 hours and the three to seven days and three to five days that CCAs report in PG&E's and SDG&E's territories, respectively.[261] UCAN also asks the Commission to deem PG&E and SDG&E non-compliant with D.13-09-025, and to require that each IOU's Green Button implementation be certified by the Green Button Alliance.[262]

PG&E argues that the 24-hour requirement in D.13-09-025 applies only to customer-authorized data sharing through its SMD platform, and that data delivered to CCAs without customer authorization under Electric Rule 23 and Schedule E-CCAINFO is outside the scope of that decision.[263] PG&E does not

[258] DWG Report, June 5, 2026 at 107.

[259] *Id.*

[260] UCAN Opening Comments at 21, CalCCA Opening Comments at 4.

[261] UCAN Opening Comments at 5–6. (*see* DWG Report at 41, 43, 46)

[262] *Id.* at 10.

[263] PG&E Reply Comments at 2.

dispute that CCAs may receive data three to seven days after usage "on occasion" when using those procedures, but maintains that this practice complies with Commission directives.[264]

The Sempra IOUs similarly argue that UCAN conflates customer-authorized third-party access with utility-to-CCA data transfers, which they state occur pursuant to Public Utilities Code Section 366.2(c)(9) and D.04-12-046, and ask that UCAN's non-compliance recommendation be rejected.[265] The Sempra IOUs also urge that any new data-delivery requirement follow an assessment of costs and benefits.[266]

3.10.2. Discussion

The DWG Report does not make recommendations about CCA interval data delivery, but the record shows the challenges with CCAs receiving timely data delivery. Each IOU collects AMI interval data from all smart meters and runs validation, editing, and estimation (VEE) processes daily, with success rates averaging 98 percent or greater.[267] SCE and SDG&E complete this processing by about 8:00 a.m. each day.[268] However, delivery of this data to the CCAs does not align with this schedule. SCE makes raw usage data available to CCAs and their back-office service provider within 24 hours.[269] PG&E's system is designed to make interval data available within 36 to 48 hours. However, CCAs in PG&E's territory "consistently struggle to receive data within the 24–48 hour window

[264] *Id.*

[265] Sempra IOUs Reply Comments at 4–6.

[266] *Id.* at 2–3, 7.

[267] DWG Report, June 5, 2026 at 41.

[268] *Id.*

[269] *Id.* at 44, 46 (Table 1).

needed for load forecasting, emergency demand reduction reporting, and virtual power plant program operations," and report receiving data three to seven days after usage.[270] PG&E does not dispute that such delays may occur on occasion.[271]

SDG&E's CCA data solution is designed to provide interval data within 48 to 72 hours, but San Diego Community Power reports receiving data for about 95 percent of accounts three to five days after power flows.[272]

We agree with PG&E and the Sempra IOUs that D.13-09-025 does not govern this issue. Ordering Paragraph 17 of that decision sets the features of the IOUs' Energy Service Provider Interface platforms, through which third parties access customer usage data when the customer authorizes it. The 24-hour figure is the lag for data updates through those platforms.[273]

Neither D.04-12-046 nor D.12-08-045 set a timeframe for delivering interval data, and the Sempra IOUs identify Section 366.2(c)(9) and D.04-12-046 as the source of the IOUs' obligation to transfer usage data to CCAs. We address that timeframe below and adopt several modifications.

Each IOU runs validation, editing, and estimation processes daily, with success rates averaging 98 percent or greater. SCE already delivers raw interval usage data to CCAs within 24 hours. PG&E's system is designed to make interval data available within 36 to 48 hours and SDG&E's within 48 to 72 hours, yet CCAs report receiving data three to seven days after usage in PG&E's territory and three to five days in SDG&E's. PG&E does not dispute that such delays may occur on occasion. UCAN recommends delivery on a lag of up to, but not

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[270] *Id.* at 43.

[271] PG&E Reply Comments at 2.

[272] *Id.* at 45–46.

[273] D.13-09-025, *Decision Authorizing Provision of Customer Energy Data to Third Parties Upon Customer Request* (Sept. 19, 2013) at 54; *id.* at 76 (Ordering Paragraph 17).

exceeding, 24 hours. However, a 98 percent daily delivery floor within 48 hours is consistent with the IOUs' reported data validation success rates and PG&E's designed availability, and a 24-hour standard is consistent with what SCE delivers today.

The Sempra IOUs urge that any new data-delivery requirement should follow an assessment of costs and benefits. The requirement we adopt below does not require a new platform, new metering infrastructure, or new data. It sets a delivery timeframe for data the IOUs already validate daily. We direct that no later than 60 days after the issuance date of this decision, the IOUs must each file a Tier 2 advice letter to implement delivery of raw interval usage data to each CCA daily, including weekends and holidays. Each daily delivery shall include interval data for at least 98 percent of the CCA's customer accounts for each day of usage, no later than 48 hours after the end of that day. This is consistent with the abilities of each of the IOUs. Intervals that are missing or corrected after delivery shall be included in the next daily delivery. No later than one year after the issuance date of this decision this requirement will be replaced by a 24-hour requirement for all accounts.[274]

We decline UCAN's request to deem PG&E and SDG&E non-compliant with D.13-09-025 because D.13-09-025 does not govern this issue. We also decline

[274] Consistent with the Commission's authority, pursuant to Section 366.2(c)(9), we establish the following procedure by which the IOUs are to provide data to CCAs.

The governing authority for interval data is Pub. Util. Code Section 366.2(c)(9). It requires every electrical corporation to "cooperate fully" with CCAs, including by providing "electrical consumption data as defined in Section 8380 and other data detailing electricity needs and patterns of usage, as determined by the Commission, and in accordance with procedures established by the commission." It also directs the Commission to "determine the terms and conditions under which the electrical corporation provides services to community choice aggregators." Section 8380 defines electrical consumption data to include "incremental and monthly meter-specific electricity data, to the extent produced by" AMI. See Pub. Util. Code section 366.2(c)(9) and section 8380(A), (f)(3).

UCAN's requests for Green Button Alliance certification and for an independent system integrator. We agree with CalCCA that the recommendation addressing DER program enrollment data sharing between the IOUs and CCAs, falls within the scope of R.25-09-004 and should be addressed there.

4. Summary of Public Comment

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the "Public Comment" tab of the online Docket Card for that proceeding on the Commission's website. Rule 1.18(a) requires that all written public comment submitted prior to the submission of the proceeding are part of the administrative record of the proceeding. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding. There were no public comments posted related to this ruling.

5. Procedural Matters

This decision affirms all rulings made by the Administrative Law Judge and assigned Commissioner in this proceeding. All motions not ruled on are deemed denied.

6. Comments on Proposed Decision

The proposed decision of Commissioner Darcie L. Houck in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____ by _____.

7. Assignment of Proceeding

Darcie L. Houck is the assigned Commissioner and Hazlyn Fortune and Jack Chang are the assigned Administrative Law Judges in this proceeding.

Findings of Fact

1 D.14-05-016 states that usage-related data includes all billing data, all program participation data, and account information.

2 D.14-05-016 created a process whereby entities can request energy usage related data from utilities and set the current aggregation thresholds for public non-consented data.

3 Customer usage data is protected by statute and by the Commission's privacy rules, and any revised threshold must keep individual customers from being identified through released data.

4 The Data Working Group recommends that the definition of "usage-related data" established in D.14-05-016 also include all data products derived from customer usage data, including energy savings estimates.

5 The record also shows that the current thresholds withhold much of the data that local governments, researchers and others need, and that the single-customer share limit, more than the customer count, drives that withholding.

6 Further exploration of whether a 4/50 threshold should be applied in California is warranted.

7 PG&E applies the 15/15 rule to total monthly load, while SCE and SDG&E could not confirm how they apply it.

8 Hourly and sub-hourly data raise questions the record does not resolve, and this decision does not extend the 4/50 threshold to those data products.

9 Ratepayer-funded program data is spread across CEDARS, DGStats and TECH Clean California, each prepared using different aggregation or anonymization methods and different geographies, and researchers seek program data at the census tract level to evaluate program reach, cost-effectiveness and the relationship between incentives, income and adoption.

10 The aggregation threshold must be applied to the customers whose data the release actually contains.

11 D.14-05-016 established the Energy Data Request Program as a process whereby entities, including local governments, can request energy usage and usage-related data from utilities and receive action on the request and resolution of disputes over access to data.

12 D.14-05-016 allows the IOUs to provide aggregated yearly, quarterly and monthly data to local governments under less restrictive thresholds than those used for public release.

13 As part of the EDRP, D.14-05-016 established Terms of Service which require under which a local government to agree not to release the data to another party or publicly disclose it.

14 The Energy Data Request Program requires utilities to respond to a request within seven business days identifying the sufficiency of the request, and within 15 days identifying whether the request will be granted. The latter response must also be provided to the Executive Director, and no release of census block-tract data can be made until four weeks after the response has been provided to the Executive Director.

15 The Energy Data Request Program requires local governments to sign Terms of Service that prohibit them from releasing the data they receive.

16 The Energy Data Request Program allows a requestor whose request a utility has denied to bring the dispute to the Energy Data Access Committee for information resolution.

17 The DWG Report recommends that the Commission should direct the IOUs to revise the Terms of Service required under D.14-05-016 when local

governments access customer usage data through the Energy Data Request Program.

18 The DWG Report states that the current Terms of Service prohibit local governments from publicly releasing data received through the EDRP and that data otherwise suitable for public reports cannot be released.

19 If the data meets the applicable privacy standard, the Terms of Service should not prevent local governments from using it for the public climate planning purpose that justified the request.

20 To the extent that unusual circumstances create a situation in which the thresholds may not be protective for a specific aggregation, the EDRP process will allow them to be flagged for further review before they are released.

21 Disputes involving release of the aggregations identified in D.14-05-016 for Use Case 2 should be subject to prompt resolution, with specific deadlines for the Energy Data Access Committee to meet and issue a recommendation.

22 Program-specific data requirements continue to be considered in multiple Commission proceedings.

23 The Commission should consider establishing consistent geographic granularity and masking standards across program reporting, which would address existing discrepancies between gas system data (published at the census tract level under R.24-09-012) and program data like CEDARS (climate zone) and DG Stats (zip code).

24 The electric IOUs have designated Tribal liaisons, and all IOUs must comply with the Commission's Tribal Consultation Policy adopted in D.26-09-072.

25 The DWG Report's recommendations on DER siting and interconnection capacity analysis on a case-by-case basis in the appropriate proceedings should continue to be explored.

26 The DWG Report and party comments reflect a gap in access to interval data for implementers of programs serving multifamily buildings and customers without online accounts.

27 The IOUs are responsible for producing and managing metered interval data that supports essential utility functions, including billing, rate recovery, grid management, and demand-side program operations, and serves entities outside the IOUs, including other load-serving entities such as CCAs.

28 The record shows the challenges with CCAs receiving timely data delivery.

29 Each IOU runs validation, editing, and estimation processes on AMI interval data daily, with success rates averaging 98 percent or greater.

30 SCE makes raw interval usage data available to CCAs within 24 hours of usage.

31 A 98 percent daily delivery floor within 48 hours is consistent with the IOUs' reported validation success rates and PG&E's designed availability, and a 24-hour standard is consistent with what SCE delivers today.

32 There is no California-specific study that examines the impact of a 4/50 aggregation threshold for public release of monthly and annual non-consented customer energy usage data, and whether the threshold protects the privacy of residential, commercial, agricultural and/or industrial customers.

33 There is no California-specific study that investigates the impact of public access to hourly and sub-hourly data.

Conclusions of Law

1. The Commission should adopt the following guiding principles related to distributed energy resource data access: uniformity, transparency, and standardization.

2. All data products derived from or related to customer metered consumption, including energy savings estimates derived from usage-related data, should be subject to applicable confidentiality protections and aggregation thresholds.

3. This Commission's Energy Division staff should coordinate with the California Energy Commission staff, investor-owned utilities, and other stakeholders to create a workplan to develop a data inventory that identifies what distributed energy resources related data each agency already collects, the authority and purpose for which the data was collected, applicable confidentiality restrictions, and whether any proposed sharing or publication would be consistent with the customer privacy, critical infrastructure, and purpose use limitations that apply to that data.

4. The Commission's Energy Division staff are encouraged to work with California Energy Commission staff, investor-owned utilities, and other stakeholders to develop a common set of data standards that will harmonize temporal and spatial reporting geographies adopted in this decision.

5. The Commission's Energy Division should be authorized to conduct or commission a study within 18 months of the issuance of this decision on:

    a. Whether a 4/50 aggregation threshold would sufficiently protect customer privacy for the public release of non-consented monthly and annual energy usage data for residential, commercial, agricultural and industrial customers; and

b. Whether hourly and sub-hourly data would sufficiently protect customer privacy if released under a 4/50 threshold or a different threshold.

6. The Commission should continue to explore a standardized data access framework that allows qualified third-party market incentive program implementers to obtain customer-level interval data when individual tenant authorization or online account access is not feasible, subject to appropriate customer privacy protections and cybersecurity requirements.

7. The Commission's Energy Division should convene a workshop to examine opportunities to standardize data publication requirements across Commission-regulated programs, including geographic granularity, anonymization, aggregation, and masking standards and prepare a workshop report.

8. It is reasonable to direct PG&E, SCE and SDG&E to provide CCAs with raw interval usage data within 48 hours of a submitted request, for at least 98 percent of the CCA's accounts, within two months of the issuance date of this decision.

9. It is reasonable to direct PG&E, SCE and SDG&E to provide CCAs with raw interval usage data within 24 hours of a submitted request, for at least 98 percent of the CCA's accounts, within one year from the issuance date of this decision.

10. It is reasonable to direct PG&E, SCE and SDG&E to file a Tier 2 advice letter within 90 days of the issuance date of this decision proposing a standardized method for calculating and applying the current 15/15 rule.

11. It is reasonable to not authorize cost recovery for any data or delivery requirements in this decision.

12. It is reasonable to adopt the five priority use cases recommended by the DWG Report as a framework for near-term action.

13. If a data product meets Commission-approved public release standards and is not reasonably re-identifiable, then the data should be treated consistently as public.

14. D.14-05-016 requirements applicable to DWG Report Use Case 2 should be modified to authorize any requestor, including Tribal governments, to request customer usage data through the Energy Data Request Program under the same rules that apply to local governments.

15. If a data product meets Commission-approved public release standards and is not reasonably re-identifiable, then the data should be treated consistently as public.

16. The Terms of Service that prohibit local governments from releasing data should be deleted because the aggregations identified in D.14-05-016 for Use Case 1 are presumptively public and may be requested by local governments, tribal governments, and the public through the Energy Data Request Program.

17. Where a third party brings a dispute regarding access to data pursuant to Section 3.5.5 of this Decision to the Energy Data Access Committee, the Energy Data Access Committee should meet within two weeks of receipt of the dispute and make a recommendation on access to the requested data within four weeks of receipt of the dispute.

18. The Commission's Energy Division staff should coordinate with the California Energy Commission staff, investor-owned utilities, and other stakeholders to create a workplan for the development of a data inventory.

    a. This process should begin with a process that identifies what DER related data each agency already collects, the authority and purpose for

which data was collected, applicable confidentiality restrictions, and whether any proposed sharing or publication would be consistent with the customer privacy, critical infrastructure, and purpose use limitations that apply to that data.

b. The Commission's Energy Division staff should:

i. Complete a report on the progress of this task 18 months from the issuance of this decision and serve the report on the service list for this proceeding; and

ii. Include recommendations in the report on next steps for finalizing the inventory and the process to adopt any rules, standards, or policies needed to complete and implement use of the inventory.

19. The Commission's Energy Division staff should coordinate with the California Energy Commission, IOUs, and other stakeholders on a common set of standards for access to DER data collected by the IOUs. Energy Division should:

a. Develop common data access standards that harmonize temporal and spatial reporting geographies adopted in this decision; and

b. Host a public workshop to present the proposed common data access standards and serve a workshop report to the service list of this proceeding.

20. UCAN's request that PG&E and SDG&E be deemed non-compliant with D.13-09-025 should be denied.

O R D E R

IT IS ORDERED that:

1 This decision adopts the following guiding principles for distributed energy resource (DER) data access: uniformity, transparency and

standardization. These guiding principles shall be used to guide future DER data access policies and rules.

2 The Commission's Energy Division is authorized to conduct or commission a study within 18 months of the issuance of this decision to determine:

a. Whether a 4/50 aggregation threshold would sufficiently protect customer privacy for the public release of non-consented monthly and annual energy usage data for residential, commercial, agricultural and industrial customers; and
b. Whether hourly and sub-hourly data would sufficiently protect customer privacy if released under a 4/50 threshold or a different threshold.

3 No later than 60 days after the issuance of this decision, Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall each file a Tier 2 advice letter to implement delivery of raw interval usage data to each Community Choice Aggregator (CCA) daily, including weekends and holidays.

a. Each daily delivery shall include interval data for at least 98 percent of the CCA's customer accounts for each day of usage, no later than 48 hours after the end of that day. Intervals that are missing or corrected after delivery shall be included in the next daily delivery.
b. No later than one year after the issuance date of this decision, the 48-hour requirement will be replaced by a 24-hour requirement for all accounts.

4 Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall jointly file a Tier 2 advice letter

within 90 days of the issuance date of this decision proposing a standardized method for calculating and applying the current 15/15 rule.

5 Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall update and file their respective Energy Data Request Program (EDRP) related tariff sheets, in a Tier 1 advice letter, to reflect the following changes set forth in Attachment 1 of this decision within 90 days of the issuance of this decision:

a. Expand access to the aggregations identified in D.14-05-016 for Use Case 2 to any requestor, including Tribal governments, using the Energy Data Request Program process; and
b. Delete the Terms of Service to allow public release of data that meets Commission-approved public-release standards and is not reasonably re-identifiable. Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall jointly file a Tier 2 advice letter adopting a uniform Energy Data Request Program Terms of Service template.

6 Rulemaking 22-11-013 is closed.

This order is effective today.

Dated _____, at San Francisco, California