

Decision **PROPOSED DECISION OF ALJ LAKEY** (Mailed 8/18/2023)

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

Application of Pacific Gas and Electric Company for Approval of Its Proposals and Cost Recovery for Improvements to the Click-Through Authorization Process Pursuant to Ordering Paragraph 29 of Resolution E-4868 (U39E).

Application 18-11-015

And Related Matters.

Application 18-11-016

Application 18-11-017

**DECISION APPROVING CLICK-THROUGH  
ENHANCEMENT APPLICATIONS**

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**Appendix – Acronyms**

## **DECISION APPROVING CLICK-THROUGH ENHANCEMENT APPLICATIONS**

### **Summary**

This decision largely approves the proposed enhancements to the Click-Through Process filed in the present applications of Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company. This decision finds that the applications comply with Ordering Paragraph 29 of Resolution E-4868, the California Public Utilities Commission privacy rules, and California privacy laws. There are no safety considerations in this proceeding. Proposals submitted by intervenors, with some exceptions, are declined.

This proceeding is closed.

### **1. Procedural Background**

On August 25, 2017, the Commission issued Resolution (Res.) E-4868 (Click-Through Resolution) in response to January 3, 2017, advice letters filed by Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) (collectively, the investor-owned utilities or IOUs). Ordering Paragraph (OP) 29 of the Click-Through Resolution required each of the IOUs to file individual applications for approval of cost estimates and propose improvements and/or enhancements to the functionality of the click-through electronic authorization process (the Click-Through Process or CTP) utilized by customers to authorize these IOUs to share a customer's energy data with third party Demand Response

Providers (DRP).<sup>1</sup> The required applications were to be filed by the IOUs within 15 months of the issuance of the Click-Through Resolution.<sup>2</sup>

In compliance with the Click-Through Resolution, on November 26, 2018, the respective IOUs timely filed the following:

- *Application of Pacific Gas & Electric Company for Approval of Cost Recovery and Improvements to Its Click-Through Process, Application (A.) 18-11-015;*
- *Application of Southern California Edison Company (U338E) in Compliance with Order Paragraph 29, Resolution E-4868, Seeking Cost Recovery for Improvements to the Click-Through Authorization Process, A.18-11-016; and*
- *Application of San Diego Gas & Electric Company (U902E) Requesting Approval And Funding For Improvements To Click-Through Process, In Compliance with Resolution E-4868, A.18-11-017.*

Thereafter, Commissioner Liane Randolph and Administrative Law Judge (ALJ) Dan Burcham were assigned to each of the IOU's proceedings on December 14, 2018.

Three separate prehearing conferences were held for the three IOUs' proceedings on April 26, 2019, before ALJ Dan Burcham. Thereafter, on September 17, 2019, Commissioner Martha Guzman Aceves was assigned in place of Commissioner Liane Randolph as to each of the three proceedings.

ALJ Andrea McGary was assigned to the three proceedings on November 5, 2019, in place of ALJ Burcham. ALJ Jessica T. Hecht was later

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<sup>1</sup> The existing approval process allows the IOUs to release a customer's energy data to third party Demand Response Providers subject to Commission privacy rules reflected in existing IOU Electric Rules: PG&E Rule 27, SCE Rule 25, and SDG&E Rule 33, as applicable. (*See also* Decision (D.) 11-07-056.)

<sup>2</sup> Res. E-4868, OP 29.

co-assigned to these proceedings on September 30, 2020. On December 5, 2019, ALJ McGary issued a ruling and consolidated the three IOUs' proceedings, A.18-11-015, A.18-11-016, and A.18-11-017, as A.18-11-015, *et al.*

An *Assigned Commissioner's Scoping Memo and Ruling* was issued on May 27, 2020. Following a July 1, 2020, case management conference, a subsequent ruling was issued by assigned ALJ McGary setting the schedule for the remainder of the consolidated proceeding.

On October 23, 2020, the *Assigned Commissioner's First Amended Scoping Memo and Ruling* (Amended Scoping Memo) was issued by Commissioner Guzman Aceves, setting a November 13, 2020, deadline for Updated Testimony. The Amended Scoping Memo removed from the scope of this proceeding the expansion of the CTP to Distributed Energy Resource providers (DERP) and Energy Management providers (EMP).

On May 28, 2021, parties filed opening briefs, including Mission:data Coalition (Mission:data), SCE, PG&E, the Public Advocates Office of the California Public Utilities Commission (Cal Advocates), and Small Business Utility Advocates (SBUA). OhmConnect, Inc. (OhmConnect), California Efficiency + Demand Management Council (CEDMC), and Leapfrog Power, Inc. (Leap) filed a joint opening brief.

On June 18, 2021, parties filed reply briefs, including Cal Advocates, SBUA, PG&E, Mission:data, SCE, and SDG&E. OhmConnect and CEDMC filed a joint reply brief.

On February 14, 2022, Commissioner John Reynolds was named the assigned Commissioner. ALJ Jonathan L. Lakey was named the assigned ALJ on October 4, 2022.

## **2. Click-Through Background**

CTP enables a customer to authorize their utility to share the customer's data with a third-party DRP through the completion of an electronic consent agreement. Customer authorization of data sharing is an essential step for customers to enroll and participate in third-party demand response (DR) programs because DR programs cannot operate without them.

D.16-06-008 ordered PG&E, SCE, and SDG&E to meet with the Commission's Energy Division and interested stakeholders to reach a consensus proposal on the CTP with the goal of streamlining and simplifying the direct enrollment process for customers. The IOUs worked with the Commission's Energy Division and held more than 16 working group meetings in person and on the phone over a six-month period.

The stakeholders developed two different click-through frameworks for consideration: Open Authorization (OAuth) Solution 3 and Application Programming Interface (API) Solution 1. In OAuth Solution 3, the customer starts on the third-party DRP's website and is redirected to the IOU website via a "pop up" window within the provider webpage. The customer enters their credentials to authenticate their identity. Then the customer selects several options including how long the third-party will be able to access the data and authorizes the data sharing. After finalizing the authorization, the customer is re-directed back to the third-party DRP's website. OAuth Solution 3 uses OAuth technology that allows customers to create an account on one website using credentials from another. In this way, a customer is able to use their credentials from one service, such as utility account login, and pass certain information on to the other provider, such as a DRP. The other provider receives a limited amount of information and does not gain access to customer credentials.



API Solution 1 uses a type of API that allows the customer to stay on the third-party DRP website for the entire authorization process. The customer enters information to authenticate their identity and this is sent to the respective IOU to be processed by its information technology (IT) system. If the information is correct, then the IOU returns information to pre-populate the authorization screen on the third-party DRP's website. The customer completes and electronically signs the authorization and allows the IOU to share the customer's data with the third-party DRP. The third-party returns an electronic record to the utility indicating the authorization was completed.

The Commission directed the IOUs to design and implement OAuth Solution 3 in OP 4 and OP 26 of the Click-Through Resolution; this is the CTP that exists today. In OP 29 of the Click-Through Resolution, the Commission directed the IOUs to seek cost recovery for the following improvements to the CTP through the present applications:

1. A proposal to expand the click-through solution(s) to other DERPs and EMPs;<sup>3</sup>
2. A cost estimate and proposal for API Solution 1;
3. A cost estimate and proposal for Synchronous data of the complete and expanded data set within 90 seconds;
4. Improvements to the authorization process that may have the effect of increasing customer enrollment in third-party DR programs;
5. Improvements in data delivery processes;
6. Upgrades to the IT infrastructure needed for click-through authorization processes;

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<sup>3</sup> This item was deemed out of scope in the Amended Scoping Memo.

7. Additional functionalities for click-through authorization processes proposed in the Customer Data Access Committee (CDAC);
8. Resolution of implementation issues related to OAuth Solution 3 or API Solution 1 raised by stakeholders in the CDAC;
9. Costs for integrating the Customer Information Service Request for Demand Response Providers (CISR-DRP) Request Form terms and conditions into the IOU Green Button platforms: Share My Data (SMD), Green Button Connect (GBC), or Customer Energy Network; and
10. Publication of customer friendly information on the IOU website, including information about Rule 24/32<sup>4</sup> and instructions on how to authorize data access or revoke authorization.

The Click-Through Resolution also established the CDAC, which was to provide timely input into the design of OAuth Solution 3, develop proposals for advice letter filings, develop proposals for the present application filings, and informally resolve disputes that arise among CTP stakeholders. The CDAC is comprised of representatives from each of the IOUs, Energy Division staff, and interested stakeholders and parties. Energy Division staff has oversight responsibility for the CDAC with the IOUs and interested stakeholders providing management of the CDAC.

### **3. Issues Before the Commission**

The Commission will consider whether the IOUs' proposed click-through enhancements: (1) comply with Click-Through Resolution OP 29; (2) are just and

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<sup>4</sup> Rule 24 (PG&E and SCE) and Rule 32 (SDG&E) are the tariffs that allows customers to enroll in DR programs offered by DRPs. For more information, please see the IOUs' respective websites or the Commission's DRP Registration Information website available at: <https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/demand-response-dr/drp-registration-information>.

reasonable; and (3) comply with current Commission privacy rules and California consumer data privacy and cyber security laws. Additionally, the Commission will consider whether PG&E's cost recovery and request for a two-way balancing account and SCE's cost recovery and request to establish a new balancing account, the "Customer Data Access Balancing Account" (CDABA), are just and reasonable. Lastly, the Commission will consider whether there are any safety considerations in granting or denying the IOUs' applications.

#### **4. Pacific Gas and Electric Company's Click-Through Enhancements**

Pursuant to Commission guidance in the Click-Through Resolution, PG&E is seeking \$19.263 million in cost recovery for its proposed CTP enhancements, which include:

- Authorization of multiple services from the same third party;
- Improvements to the on-boarding processes for third parties;
- Added enhancements to the sign-in page;
- Enablement of customer management of all third-party authorizations;
- Customer-friendly Rule 24 information on PG&E's website;
- Improved ability to provide Community Choice Aggregator (CCA)/Direct Access (DA) customer data;
- Provision of third-party role-based data access;
- Provision of a synchronous data set within 90 seconds;
- Additional data elements; and
- An Alternate Solution Proposal.

PG&E is requesting cost recovery for these enhancements through a two-way balancing account. This decision reviews the proposed enhancements before analyzing PG&E's proposal.

#### **4.1. Authorization of Multiple Services From the Same Third Party**

PG&E expanded its CTP beyond DRPs to all third parties under Rule 25, including EMPs and DERPs.<sup>5</sup> Under the current process, the data a third party receives are determined by whether Rule 24 or Rule 25<sup>6</sup> applies to the third party. The existing SMD<sup>7</sup> implementation requires that a third party that interacts with customers in multiple roles (*e.g.*, as both a Rule 24 and Rule 25 third party) must request an authorization for each unique role. PG&E believes that as the number of third parties and types of roles increases, the customer experience would benefit from third parties being able to request customer authorization once for a given third party. PG&E proposes an additional feature in its SMD platform to allow third parties to be able to receive customer data corresponding to the third parties' multiple roles with a single customer authorization.<sup>8</sup>

#### **4.2. Improved Ability to Provide Community Choice Aggregator/Direct Access Data**

PG&E was authorized in the Click-Through Resolution to release data of CCA and DA customers to DRPs that are required to calculate a customer's estimated electric bill savings from participating in DRP programs.<sup>9</sup> The

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<sup>5</sup> PG&E-0001 at 2-2.

<sup>6</sup> Rule 24 and Rule 25 are the two tariffs through which customers can authorize third parties to access their data. Rule 24 applies to DRPs while Rule 25 applies to non-DRP third parties.

<sup>7</sup> SMD is PG&E's implementation of the GBC standard.

<sup>8</sup> PG&E-0001 at 2-4.

<sup>9</sup> Click-Through Resolution at 70.

Click-Through Resolution noted that PG&E's ability to release these data is contingent on PG&E receiving these data.<sup>10</sup> Additionally, there are four options for data exchange between PG&E and Electric Service Providers (ESP), but only two of these options are available for data exchange between PG&E and CCAs.<sup>11</sup> The two data exchange options available to both CCAs and ESPs are PG&E Consolidated Billing – Rate Ready (Rate Ready) and PG&E Consolidated Billing – Bill Ready (Bill Ready).<sup>12</sup> These are also the only data exchange options for which PG&E could provide DRPs with customer data. While Rate Ready customer data come in a format that can be accessed and searched, Bill Ready customer data do not. PG&E proposes, in order to parse Bill Ready data, to build a new data extract, transform, and load (ETL) process to store and retrieve Bill Ready CCA/ESP customer billing information and make it accessible to third parties via API.

#### **4.3. Third-Party Role-Based Data Access**

PG&E proposes making a more granular distinction between types of third parties with respect to data access. That is, upon customer authorization, the data accessible by a third party would be determined by that third party's role and corresponding scope.

There is currently no distinction under the existing Rule 25 tariff determining which types of third parties are given access to which data; the SMD platform only distinguishes between DRPs under Rule 24 and other types of third parties participating under Rule 25. As such, PG&E proposes that new roles

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<sup>10</sup> *Ibid.*

<sup>11</sup> PG&E-0001 at 2-14 to 2-15.

<sup>12</sup> *Ibid.* at 2-15.

and corresponding system functionalities be added to the SMD platform. As noted in the Amended Scoping Memo, expanding the click-through solution to other distributed energy resource and energy management providers is out of scope to the present proceeding. Therefore, PG&E's proposal for cost recovery on third party role-based data access is denied.

#### **4.4. Synchronous Data Set within 90 Seconds**

OP 29, Item 3 of the Click-Through Resolution requires the IOUs to provide a cost estimate and proposal to implement a solution to provide the full Rule 24 data set within 90 seconds, which PG&E does. While PG&E states that it already delivers energy-related data per authorized customer service agreement within 90 seconds,<sup>13</sup> PG&E proposes data delivery system enhancements to cope with an expected growth in customer data access. PG&E notes that the speed with which data requests can be processed is affected both by the number of parallel requests currently being processed as well as the complexity of the request parameters.<sup>14</sup> To address the former, PG&E proposes an upgrade to its SMD data inbound and outbound to a cloud-based Infrastructure-as-a-Service (IaaS) system. To address the latter, PG&E proposes an upgrade of its SMD supporting data layer to an IaaS system to allow complex request parameters to be processed with big data methods and technologies.

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<sup>13</sup> *Ibid.* at 2-23; this statement excludes bulk requests, as these cannot be guaranteed to be delivered on average in 90 seconds, as well as requests with complex queries.

<sup>14</sup> *Ibid.* at 2-24.

#### **4.5. Additional Rule 24 Data Elements**

Through Energy Division's request for informal comments on the CDAC White Paper, PG&E has identified the following data elements proposed by third parties for inclusion in the Rule 24 data set:<sup>15</sup>

- Program Information (*e.g.*, customer energy efficiency program enrollment)
- Residential Meter Reprogramming to 15-minute Intervals
- Real-time/5-minute Interval Data
- Hourly Gas Data
- Customer Location
- Peak Load Contribution/ Average Annual Demand
- Service Agreement Termination and Move-Out Date
- Billing Cycle Dates
- Customer Email Address

With the exception of Program Information, PG&E declines to include any of the proposed additional data elements.

#### **4.6. Alternate Solution Proposal**

In compliance with OP 29, Item 2 of the Click-Through Resolution, PG&E provides an Alternate Solution Proposal for API Solution 1.<sup>16</sup> PG&E recommends that the Commission not require implementation of API Solution 1 as it is not an efficient or effective use of ratepayer funds for the following five reasons. PG&E argues that API Solution 1 is duplicative of the existing OAuth solution, that additional investments are required to implement API Solution 1, that API Solution 1 does not follow industry OAuth 2 or other standards and requires

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<sup>15</sup> *Ibid.* at 2-26 to 2-32.

<sup>16</sup> API Solution 1 is described in detail in Section 2 above.

additional oversight from the Commission and PG&E, that API Solution 1 does not guarantee a more secure system, and that it is unclear whether API Solution 1 provides a better customer experience.

#### **4.7. Other Proposed Enhancements**

PG&E proposes adding features to allow customers to create an online account within the existing CTP<sup>17</sup> and manage existing third-party data access authorizations in one place regardless of whether the authorization route is digital (*e.g.*, Guest Access) or paper/Portable Document Format (PDF) based (*e.g.*, CISR-DRP).<sup>18</sup>

PG&E also proposes improvements shortening the number of steps necessary to navigate to its Rule 24 webpage providing customer instructions on how to create data sharing authorizations and revoke data access.<sup>19</sup> The existing process requires customers to navigate through several links to get to the appropriate information.

Finally, PG&E proposes implementing a simulated SMD service, or “sandbox environment,” for third parties to develop and test their systems and business processes with the SMD API prior to implementing them. The sandbox environment will be accessible as a self-service process to all interested third parties and will provide a set of test API endpoints with model responses intended to simulate the production endpoints on SMD.<sup>20</sup>

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<sup>17</sup> *Ibid.* at 2-5.

<sup>18</sup> *Ibid.*

<sup>19</sup> *Ibid.* at 2-6.

<sup>20</sup> *Ibid.* at 2-4 through 2-5.



#### **4.8. Compliance with Ordering Paragraph 29 of the Click-Through Resolution and Cost Recovery of Authorized Enhancements**

PG&E complied with OP 29 of the Click-Through Resolution. Parties to applications A.18-11-015, A.18-11-016, and A.18-11-017 had limited specific objections to the enhancements proposed by PG&E and considerable additional recommendations, discussed in more detail below, beyond the question of whether the IOUs complied with OP 29 of the Click-Through Resolution. As such, there is little in the evidentiary record to deny PG&E's proposed enhancements.

In compliance with OP 29, Item 2 of the Click-Through Resolution, PG&E submitted a cost estimate and proposal to implement API Solution 1. Given the substantial cost of implementing API Solution 1 relative to the existing CTP, the decreased privacy and cybersecurity protections of API Solution 1, and the existence of a satisficing solution (OAuth Solution 3), the Commission declines to implement API Solution 1.

In compliance with OP 29, Item 3 of the Click-Through Resolution, PG&E currently provides the complete and expanded data set within 90 seconds, on average. PG&E also proposes infrastructure upgrades to ensure that it is able to retain this performance level with an increased volume of data authorizations.

In proposing CTP enhancements that allow customers to authorize DRPs to access customer data more easily or conveniently, PG&E has satisfied the requirements of OP 29, Item 4 of the Click-Through Resolution. An example of these enhancements includes PG&E's proposal to shorten the number of steps necessary for customers to navigate the Rule 24 webpage providing instructions on creating data sharing authorizations.

In compliance with OP 29, Item 5 of the Click-Through Resolution, PG&E proposed improvements to its data delivery process.

In compliance with OP 29, Item 6 of the Click-Through Resolution, PG&E proposed upgrades to its IT infrastructures needed for the CTP.

In compliance with OP 29, Items 7-8 of the Click-Through Resolution, PG&E proposed additional functionalities proposed in the CDAC for the CTP or noted that requested functionalities had already been implemented, including resolving implementation issues related to OAuth Solution 3.

In compliance with OP 29, Item 9 of the Click-Through Resolution, PG&E has integrated the CISR-DRP Request Form terms and conditions into its Green Button platform.

In compliance with OP 29, Item 10 of the Click-Through Resolution, PG&E has provided the publication of customer-friendly information on its website, including information about Rule 24 and instructions on how to authorize or revoke data access.

As noted in PG&E's opening brief, no party commented on PG&E's cost recovery proposal of \$19.263 million.<sup>21</sup> While several parties requested additional enhancements, no parties opposed any of PG&E's proposed enhancements. As discussed above and supported by factual background in Section 4, PG&E complies with the requirements of OP 29 of the Click-Through Resolution and its application aligns with the goals of the Click-Through Resolution. However, as noted in the Amended Scoping Memo, expanding the click-through solution to other distributed energy resource and energy management providers is out of scope to the present proceeding. Therefore, PG&E's proposal for cost recovery on

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<sup>21</sup> PG&E Opening Brief at 21.

third party role-based data access is denied. PG&E's other proposed enhancements are reasonable.

In the intervening years since PG&E's filing of A.18-11-015 and its corresponding testimony, the need for some of the proposed enhancements may have dissipated. In order to provide transparency around the necessity, implementation, and cost of these enhancements, the Commission directs PG&E to file an information-only advice letter within 120 days of the issuance date of this decision with a table providing the following information but excluding reference to the third party role-based data access enhancement:

1. A complete, itemized list of the enhancements proposed in the present application;
2. The estimated cost for each proposed enhancement;
3. The actual cost for completed enhancements;
4. The estimated completion date for each proposed enhancement;
5. The actual completion date for completed enhancements;  
and
6. Whether the proposed enhancement has been completed.

PG&E requests the use of a two-way balancing account for cost recovery in their application. Due to the age of PG&E's forecast and the inherently uncertain nature of this forecast, a balancing account creates risks to ratepayers that a memorandum account can reduce. As such, this request is denied. The Commission instead directs PG&E to establish a memorandum account as its CTP cost recovery mechanism.

## **5. Southern California Edison Company's Click-Through Enhancements**

Pursuant to Commission guidance in the Click-Through Resolution, SCE is seeking \$17.719 million in cost recovery for its proposed CTP enhancements, which include:

- Provision of a Data-driven Model Proposal;
- Provision of an Alternate Solution Proposal;
- Provision of Synchronous Data;
- Provision of an Alternate Path for Customer Authorization Through My Account Feature on SCE.com;
- Improving Third-Party Registration Page and Enable Additional Self-Service Features;
- Improving Handling of Authorizations Errors;
- Modifications to Internal Administration Modules;
- Transition to Cloud-Based System;
- Creation of New APIs;
- Centralization of Customer Information Service Requests (CISR);
- Standardization of Data;
- Upgrades to the IT Infrastructure for CTP;
- Provision of Click-Through Authorization Functionalities Proposed in CDAC Forum; and
- Resolution of Implementation Issues from CDAC Related to OAuth Solution 3 or API Solution 1.

SCE is requesting cost recovery through a CDABA, described in more detail below in Section 5.8.

### **5.1. Data System Changes**

SCE proposes a data authorization process that allows customers to authorize the release of pre-defined data elements and categories to a designated

third party while also allowing the third party to view the data elements to determine those needed to conduct business; SCE calls this a data-driven model. SCE believes that this process will be beneficial to third parties by not placing them into rigid types, especially for those third parties that provide more than one type of service, while also providing more customer visibility and control over which of their data are shared.<sup>22</sup>

SCE also proposes to further standardize data sets to align with Energy Service Provider Interface (ESPI) standards and make updates to existing Extensible Markup Language (XML) extracts as needed for alignment.<sup>23</sup>

To support its obligations to share revenue quality meter data (RQMD), SCE proposes to re-architect its data system through a transition to a scalable cloud-based Operational Data Store (ODS). The ODS would contain a “golden copy” of usage data including interval, customer profile, Rule 24, billing, and other usage data. The ODS will also support formats required for third-party publication. SCE claims that this move will support the delivery of timely and accurate usage data across the entirety of the meter data life cycle.<sup>24</sup>

## **5.2. Alternate Solution Proposal**

In compliance with OP 29, Item 2 of the Click-Through Resolution, SCE provides an Alternate Solution Proposal for API Solution 1.<sup>25</sup> However, like PG&E, SCE opposes implementation of API Solution 1, citing its failure to ensure

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<sup>22</sup> SCE-0100 at 17.

<sup>23</sup> *Ibid.* at 18.

<sup>24</sup> *Ibid.* at 41-44.

<sup>25</sup> API Solution 1 is described in detail in Section 2 above.

minimal customer data privacy requirements and its redundancy and inferiority to the existing OAuth CTP.<sup>26</sup>

### **5.3. Synchronous Data within 90 Seconds**

OP 29, Item 3 of the Click-Through Resolution requires the IOUs to provide a cost estimate and proposal to implement a solution to provide the full Rule 24 data set within 90 seconds, which SCE does. However, as SCE argues that implementation of the proposal would result in a large expense,<sup>27</sup> lacks cost effectiveness,<sup>28</sup> and would not support a demonstrated need on the part of DRPs,<sup>29</sup> SCE proposes to not implement the solution to provide the full Rule 24 data set within 90 seconds. Like PG&E, SCE prefers to use the term “quick data delivery” instead of “synchronous data” to avoid any confusion introduced by the term “synchronous,” which SCE claims has a technical use other than that used in the Click-Through Resolution.

SCE notes that it currently provides the summarized data set to DRPs within 90 seconds (on average) of customer authentication and authorization. The summarized data set is intended to allow DRPs to quickly verify customer eligibility and determine whether the customer would benefit from the DRP’s DR program.<sup>30</sup> The full Rule 24 data set is currently provided within two business days of authentication and authorization.

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<sup>26</sup> *Ibid.* at 21.

<sup>27</sup> *Ibid.* at 28.

<sup>28</sup> *Ibid.* at 27.

<sup>29</sup> *Ibid.*

<sup>30</sup> *Ibid.* at 26.

#### **5.4. Upgrades to the Information Technology Infrastructure for Click-Through Process**

SCE requests cost recovery for Administrative Costs, including for Organizational Change Management (OCM), to support the CTP work requested in their application. Notably, SCE includes costs for project management, project delivery support, training, and OCM but does not request funds here for building out any IT infrastructure as costs for the transition to a cloud-based platform for SCE.com, including Click-Through, were included as part of SCE's 2018 General Rate Case.

#### **5.5. Click-Through Authorization Functionalities Proposed in Customer Data Access Committee Forum**

SCE notes 18 distinct proposals from the CDAC.<sup>31</sup> However, SCE does not propose to implement any of the proposals other than those discussed below.

SCE proposes enabling customer authorization through SCE.com's My Account feature as an alternative path to the CTP. SCE argues that this additional mechanism would be beneficial to DRPs as it provides another means for customers to complete the data access authorization process.<sup>32</sup>

SCE proposes to modify their internal systems to centralize CISRs, both paper and electronic, into a consolidated system and to standardize the output format of CISRs.<sup>33</sup>

SCE proposes standardizing the data output format to XML only and eliminating comma-separated values (CSV) files. Additionally, SCE proposes changing its data extraction process by ensuring that the expanded data set and

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<sup>31</sup> *Ibid.* at 54.

<sup>32</sup> *Ibid.* at 30.

<sup>33</sup> *Ibid.* at 45.

summarized data set formats align with North American Energy Standards Board ESPI Standard (REQ.21).<sup>34</sup>

Relatedly, SCE proposes revising the 90 second summary data to include additional data fields required for customer registration with the California Independent System Operator (CAISO), namely, Sub-LAP and Masked Service Account Identifier.<sup>35</sup>

**5.6. Resolution of Implementation Issues from Customer Data Access Committee Related to Open Authorization Solution 3 or Application Programming Interface Solution 1**

SCE nominally proposes the following changes to address DRP concerns with issues arising from the authentication process:

- Provide status updates to DRPs when a customer account becomes inactive through existing API or other push mechanism (the latter for automation);
- Provide information and greater visibility on why a customer fails to complete the OAuth process; and
- Address lengthening the lifespan of refresh tokens.

However, the only item in this list that is actually being addressed is the first item, as SCE notes the outcome of their Click-Through customer questionnaire in their testimony<sup>36</sup> and states that the lifespan of refresh tokens cannot be lengthened beyond the current 90 days.<sup>37</sup>

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<sup>34</sup> *Ibid.*

<sup>35</sup> *Ibid.* at 45.

<sup>36</sup> *Ibid.* at 60.

<sup>37</sup> *Ibid.* at 57 and 63.



### **5.7. Other Proposed Enhancements**

SCE proposes to improve the third-party registration page and enable additional self-service features for DRPs to manage their registered profiles, including the ability to update enrollment uniform resource locators.<sup>38</sup>

To assist DRPs with quickly obtaining data and addressing inquiries from the new cloud-based solution via the self-serve mechanism provided by APIs, SCE proposes the creation of new APIs. The APIs proposed include an Account Status API, Usage and Billing API, Interval Data API, and Customer Information API.<sup>39</sup>

SCE also proposes improvements in handling authorization errors by: (1) improving update responses to back-office systems whenever the status of any enrollment or authorization changes; (2) preventing duplicate authorizations through error handling; and (3) providing code enhancements to mitigate authorization and enrollment process delays.<sup>40</sup>

SCE claims that improved internal controls will allow SCE to manage CISR submission errors and check submissions for accuracy and the management of revocations while addressing DRP inquiries in a timely manner.<sup>41</sup> To facilitate this, SCE proposes modifications to its internal administration modules, including the expansion of monitoring and tracking of authorization and enrollment-related activities through the creation of new internal reports.

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<sup>38</sup> *Ibid.*

<sup>39</sup> *Ibid.* at 44.

<sup>40</sup> *Ibid.*

<sup>41</sup> *Ibid.* at 30-31.

### **5.8. Cost Recovery**

SCE seeks authorization to establish a CDABA for recovery requirements associated with no more than \$17.7 million in direct capital expenditures and operation and maintenance (O&M) expenses related to implementation of SCE's Click-Through enhancements. The Commission granted SCE's motion to establish an interim memorandum account, the Click-Through/Rule 24 Memorandum Account, in support of the data delivery and Click-Through enhancements proposed in the present application in D.21-12-005.

SCE proposes to transfer the balance in the CDABA on an annual year-end basis to the distribution sub-account of the Base Revenue Requirement Balancing Account (BRRBA). The December 31st balance recorded in the BRRBA would be consolidated into rate levels on January 1 of each subsequent year through SCE's year-end consolidated revenue requirement and rate change advice filing.

SCE further proposes that, if the Commission approves the scope of its present application, the total recorded spend up to the forecast amounts (*i.e.*, \$17.7 million) be deemed reasonable. If any amount of total spend is recorded in excess of this forecast amount, the additional costs will be subject to after-the-fact reasonableness review and SCE will propose cost recovery in the Energy Resource Recovery Account (ERRA) Review proceeding. SCE proposes that the recorded operation of the CDABA be reviewed by the Commission in SCE's annual ERRA Review proceeding.

### **5.9. Compliance with Ordering Paragraph 29 of the Click-Through Resolution and Cost Recovery of Authorized Enhancements**

SCE complied with OP 29 of the Click-Through Resolution. Parties to applications A.18-11-015, A.18-11-016, and A.18-11-017 had limited specific objections to the enhancements proposed by SCE and considerable additional

recommendations, discussed in more detail below, beyond the question of whether the IOUs complied with OP 29 of the Click-Through Resolution. As such, there is little in the evidentiary record to deny SCE's proposed enhancements.

In compliance with OP 29, Item 2 of the Click-Through Resolution, SCE submitted a cost estimate and proposal to implement API Solution 1. Given the substantial cost of implementing API Solution 1 relative to the existing CTP, the decreased privacy and cybersecurity protections of API Solution 1, and the existence of a satisficing solution (OAuth Solution 3), the Commission declines to implement API Solution 1.

In compliance with OP 29, Item 3 of the Click-Through Resolution, SCE provides a proposal and cost estimate for providing the complete and expanded data set within 90 seconds. However, SCE requests that the Commission determine it is neither prudent nor reasonable to make the full data set available within 90 seconds. The Commission agrees with SCE and rejects the proposal to make the full data set available in 90 seconds.

In proposing CTP enhancements that allow customers to authorize DRPs to access customer data more easily or conveniently, SCE has satisfied the requirements of OP 29, Item 4 of the Click-Through Resolution. An example of these enhancements includes SCE's proposal to provide an alternate path to allow customers to authorize DRP data access directly through SCE.com.

In compliance with OP 29, Item 5 of the Click-Through Resolution, SCE proposed improvements to its data delivery process. In particular, SCE proposes to re-architect its data system through a transition to a scalable cloud-based ODS to support its obligations to share RQMD.

In compliance with OP 29, Item 6 of the Click-Through Resolution, SCE proposed upgrades to its IT infrastructures needed for the CTP.

In compliance with OP 29, Items 7-8 of the Click-Through Resolution, SCE proposed additional functionalities proposed in the CDAC for the CTP or noted that requested functionalities had already been implemented, including resolving implementation issues related to OAuth Solution 3.

In compliance with OP 29, Item 9 of the Click-Through Resolution, SCE has integrated the CISR-DRP Request Form terms and conditions into its Green Button platform.

In compliance with OP 29, Item 10 of the Click-Through Resolution, SCE has provided the publication of customer friendly information on its website, including information about Rule 24 and instructions on how to authorize or revoke data access.

SCE notes in its opening brief that its proposed enhancements in the amount of \$17.7 million are uncontested by the parties.<sup>42</sup> As discussed above and supported by factual background in Section 5, SCE complies with the requirements of OP 29 of the Click-Through Resolution and its application aligns with the goals of the Click-Through Resolution. As such, SCE's proposed enhancements are reasonable.

In the intervening years since SCE's filing of A.18-11-016 and its corresponding testimony, the need for some of the proposed enhancements may have dissipated. In order to provide transparency around the necessity, implementation, and cost of these enhancements, the Commission directs SCE to

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<sup>42</sup> SCE Opening Brief at 9.

file an information-only advice letter within 120 days of the issuance date of this decision with a table providing:

1. A complete, itemized list of the enhancements proposed in the present application;
2. The estimated cost for each proposed enhancement;
3. The actual cost for completed enhancements;
4. The estimated completion date for each proposed enhancement;
5. The actual completion date for completed enhancements;  
and
6. Whether the proposed enhancement has been completed.

SCE requests the establishment of the CDABA balancing account in its application. Due to the age of SCE's forecast and the inherently uncertain nature of this forecast, a balancing account creates risks to ratepayers that a memorandum account can reduce. As such, this request is denied. The Commission instead directs SCE to continue the use of its existing CTP cost recovery mechanism.

#### **6. San Diego Gas & Electric Company's Click-Through Enhancements**

Pursuant to Commission guidance in the Click-Through Resolution, SDG&E is seeking \$1.222 million in cost recovery for their proposed CTP enhancements, which include:

- Provision of Synchronous Data within 90 Seconds;
- Provision of CTP Authorization Process Improvements;
- Provision of Data Delivery Process Improvements;
- Provision of CTP Infrastructure Improvements;
- Provision of CTP Functionalities Proposed in CDAC;
- Integration of CISR-DRP Form Terms and Conditions with Utility Green Button Platform;

- Publication of Information on Utility Website;
- Adding Additional Elements to Click-Through Data Set;
- Provision of an Alternate Solution Proposal.

SDG&E proposes to continue its existing cost recovery mechanism.<sup>43</sup>

### **6.1. Data Delivery Process Improvements**

SDG&E does not see the need for further delivery process improvements.

They note that they have not received negative comments or feedback from DRPs that indicates the current data delivery processes are inadequate in meeting DRPs' needs. Relatedly, SDG&E implemented use of the Commission-approved Data Issue Reporting Template in May 2020 which the DRPs can email to SDG&E with any data issues they are experiencing. SDG&E is not seeking funding for this function.<sup>44</sup>

### **6.2. Click-Through Process Infrastructure Improvements**

SDG&E proposes the implementation of a dedicated integration test environment to streamline third-party testing of SDG&E's system for connectivity and data flow. The CTP test environment is currently shared with other SDG&E systems and is not always readily available.<sup>45</sup>

Mission:data argues that the CTP testing environment proposed by SDG&E should be covered by shareholders, not ratepayers. Mission:data claims

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<sup>43</sup> SDG&E's current Direct Participation Demand Response Memorandum Account (DPDRMA) records O&M and capital-related costs associated with implementing the direct participation of demand response in the CAISO's market. The DPDRMA also describes the process for the disposition of the balance. At the end of each year, the DPDRMA balance is transferred to the Rewards and Penalties Balancing Account (RPBA). SDG&E files an advice letter in October of each year to include the forecasted year-end RPBA balance in rates effective January 1 of the following year.

<sup>44</sup> SDG&E-0201 at NU-5 through NU-6.

<sup>45</sup> *Ibid.* at NU-6 and described in more detail in SDG&E-0202.

that this is a standard feature of IT platforms and should have already been implemented.<sup>46</sup>

### **6.3. Click-Through Process Functionalities and Resolution of Click-Through Process Implementation Issues Proposed in Customer Data Access Committee**

SDG&E argues that several of the following CTP functionalities proposed in the CDAC are already implemented or objectionable, while some may be implementable. The list of CDAC-proposed CTP functionalities include:<sup>47</sup>

- Improvements to ongoing data delivery;
- Functionality to inform authorized provider with details on the status of the customer authorization;
- Use of SDG&E's company logo on the third-party website to identify where an SDG&E customer initiates the CTP;
- Specific enhancement to the sign-in page providing sign-up for an online account or retrieval of credentials;
- Functionality to facilitate resolution of enrollment conflicts as an optional part of the CTP flow;
- Improved visibility into why an individual customer may fail to complete the CTP OAuth process;
- Lengthening the lifespan of refresh tokens to at least one year; and
- Transition of the of the revocation notification from email to a file (or push notification).

SDG&E states that several of these functionalities have already been implemented and do not need to be costed, including improvements to ongoing

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<sup>46</sup> MD-0500 at 16-20.

<sup>47</sup> *Ibid.* at NU-7 through NU-8.

data delivery,<sup>48</sup> providing the ability to sign up for an online account or retrieval of credentials,<sup>49</sup> and lengthening the lifespan of refresh tokens to at least one year.<sup>50</sup> SDG&E objects to the use of SDG&E's logo on third-party websites<sup>51</sup> as well as providing improved visibility into why an individual customer may fail to complete the CTP.<sup>52</sup> The remaining enhancements proposed in the CDAC are discussed below.

SDG&E proposes providing the functionality to retrieve the status of a customer's authorization (*i.e.*, whether the authorization was revoked, cancelled, or expired) if a DRP stops receiving that customer's data. This proposed functionality has the added benefit of providing customer data access revocation notification to DRPs through a file or push notification instead of through email.<sup>53</sup>

SDG&E believes that the functionality to facilitate resolution of enrollment conflicts as part of the CTP flow would add value to the CTP and proposes a process and costs for doing so.<sup>54</sup>

SDG&E also believes that the request to transition the revocation notification from email to a push notification would add value to the CTP. SDG&E proposes that customers who revoke their authorization in the CTP will

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<sup>48</sup> *Ibid.* at NU-7.

<sup>49</sup> *Ibid.*

<sup>50</sup> *Ibid.* at NU-8.

<sup>51</sup> *Ibid.* at NU-7.

<sup>52</sup> *Ibid.* at NU-8.

<sup>53</sup> SDG&E-0202 at TM-10.

<sup>54</sup> *Ibid.*



receive an email confirmation, and the DRP should receive notification via a “push” rather than as a separate email.

SDG&E states there are no known implementation issues related to the OAuth Solution 3 CTP utilized by SDG&E and they are not seeking funding for this requirement.<sup>55</sup>

#### **6.4. Adding Additional Rule 32 Data Elements**

From feedback given on the CDAC Whitepaper that provides a background on the click-through authorization and data delivery process and solicits informal feedback on expanding Click-Through to DERPs and EMPs, SDG&E proposes adding additional data elements to the current Rule 32 data set, including Gas Usage Data, Historical Energy Efficiency Program Participation, and Customer’s Rate Change Notification. The addition of data to SDG&E’s Rule 32 data set requires changes to Electric Rule 32 tariff.<sup>56</sup>

OhmConnect expresses concern about SDG&E’s method of sending customers with active CISR-DRP forms a notification that there will be more fields of their data being shared with authorized third parties and that they have a chance to revoke data access.<sup>57</sup> OhmConnect believes that the established process for customers to revoke data access should be used and that other pathways, such as a single hyperlink click, should be avoided. OhmConnect argues that these other pathways may disadvantage third-party DRPs by making it easier for customers to inadvertently cancel their data sharing authorizations with DRPs.

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<sup>55</sup> SGD&E-0201 at NU-8 to NU-9.

<sup>56</sup> SDG&E-0201 at NU-10 to NU-13.

<sup>57</sup> OHM-0601 at 19-20.

### **6.5. Alternate Solution Proposal**

In compliance with OP 29, Item 2 of the Click-Through Resolution, SDG&E provides an Alternate Solution Proposal for API Solution 1, described in Section 2 above. However, like PG&E and SCE, SDG&E opposes implementation of API Solution 1, citing the potential cost to ratepayers<sup>58</sup> and cybersecurity risks<sup>59</sup> of implementing this solution.

### **6.6. Completed Enhancements**

SDG&E states it has integrated the terms and conditions of the CISR-DRP in every path available for customers to authorize the sharing of their data. Therefore, SDG&E is not seeking additional funding for this requirement.<sup>60</sup>

SDG&E states it is already providing the complete and expanded data set within 90 seconds and anticipate that they could continue to provide this level of performance even if all customers in SDG&E territory were to participate in Rule 32.<sup>61</sup> Consequently, they are not requesting funding for this function.

SDG&E notes that it has already developed and published a customer education page. SDG&E is not seeking additional funding for this requirement.<sup>62</sup>

SDG&E has implemented a communication plan to follow when a planned or unplanned outage occurs to the systems impacting the CTP. SDG&E notes that there have been instances where it has been made aware of unplanned outages

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<sup>58</sup> *Ibid.* at NU-20.

<sup>59</sup> SDG&E-0202 at TM-18 to TM-30.

<sup>60</sup> *Ibid.* at NU-9.

<sup>61</sup> *Ibid.* at NU-4.

<sup>62</sup> *Ibid.*

by DRPs. As this has already been implemented, SDG&E is not requesting budget for creation and implementation of this process.<sup>63</sup>

**6.7. Compliance with Ordering Paragraph 29 of the Click-Through Resolution and Cost Recovery of Authorized Enhancements**

SDG&E complied with OP 29 of the Click-Through Resolution. Parties to applications A.18-11-015, A.18-11-016, and A.18-11-017 had limited specific objections to the enhancements proposed by SDG&E and considerable additional asks, discussed in more detail below, beyond the question of whether the IOUs complied with OP 29 of the Click-Through Resolution. As such, there is little in the evidentiary record to deny SDG&E's proposed enhancements.

In compliance with OP 29, Item 2 of the Click-Through Resolution, SDG&E submitted a cost estimate and proposal to implement API Solution 1. Given the substantial cost of implementing API Solution 1 relative to the existing CTP, the decreased privacy and cybersecurity protections of API Solution 1, and the existence of a satisficing solution (OAuth Solution 3), the Commission declines to implement API Solution 1.

SDG&E currently provides the complete and expanded data set within 90 seconds and anticipates that it can maintain this level of performance even if the entire population of customers in its service territory participated in the CTP. This exceeds the requirements of OP 29, Item 3 of the Click-Through Resolution and a cost estimate and proposal are therefore not needed.

In proposing CTP enhancements that allow customers to authorize DRPs to access customer data more easily or conveniently, SDG&E has satisfied the requirements of OP 29, Item 4 of the Click-Through Resolution. An example of

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<sup>63</sup> *Ibid.* at NU-5.

these enhancements includes SDG&E's implementation of a communication process around planned and unplanned CTP outages that reduce customer abandonment of the CTP.

SDG&E does not see the need for further delivery improvements. SDG&E notes that it has not received negative comments or feedback from DRPs that indicates the current data delivery processes are inadequate in meeting DRPs' needs. No parties object to SDG&E's characterization of its lack of need for data delivery process improvements.

In compliance with OP 29, Item 6 of the Click-Through Resolution, SDG&E proposed upgrades to its IT infrastructures needed for the CTP.

In compliance with OP 29, Items 7-8 of the Click-Through Resolution, SDG&E proposed additional functionalities proposed in the CDAC for the CTP or noted that requested functionalities had already been implemented, including resolving implementation issues related to OAuth Solution 3.

SDG&E does not use the Green Button standard for its CTP but has implemented the CISR-DRP form terms and conditions in every path available for customers to authorize sharing of their data and is not seeking funding for this requirement. The Commission did not require SDG&E to use the Green Button standard for its CTP and therefore finds that it has complied with OP 29, Item 9 of the Click-Through Resolution.

In compliance with OP 29, Item 10 of the Click-Through Resolution, SDG&E has provided the publication of customer-friendly information on its website, including information about Rule 32 and instructions on how to authorize or revoke data access.

With the exception of Mission:data's objection to SDG&E's cost recovery for its proposed testing environment and automated method for DRPs to

determine the status of authorizations<sup>64</sup> and OhmConnect's objection to SDG&E's method of contacting customers about sharing additional data, SDG&E's proposed enhancements are uncontested.

Regarding Mission:data's objection to SDG&E's cost recovery for a dedicated test environment, the Commission is persuaded by SDG&E's argument that SDG&E has had a functioning test environment and that what it actually proposes is an additional testing environment.<sup>65</sup> Given this, the Commission allows cost recovery for these proposed enhancements.

Regarding OhmConnect's concern about SDG&E's method of sending customers with active CISR-DRP forms a notification about the sharing of additional data, the Commission clarifies that SDG&E must use the established process for having customers cancel data sharing authorizations and make this process clear in their notification to customers with active CISR-DRP forms.

SDG&E complies with the requirements of OP 29 of the Click-Through Resolution and its application aligns with the goals of the Click-Through Resolution. As such, SDG&E's proposed enhancements are reasonable.

In the intervening years since SDG&E's filing of A.18-11-017 and its corresponding testimony, the need for some of the proposed enhancements may have dissipated. In order to provide transparency around the necessity, implementation, and cost of these enhancements, the Commission directs SDG&E to file an information-only advice letter within 120 days of the issuance date of this decision with a table providing:

1. A complete, itemized list of the enhancements proposed in the present application;

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<sup>64</sup> Mission:data Opening Brief at 14-15.

<sup>65</sup> SDG&E-0209 at TM-9.

2. The estimated cost for each proposed enhancement;
3. The actual cost for completed enhancements;
4. The estimated completion date for each proposed enhancement;
5. The actual completion date for completed enhancements;  
and
6. Whether the proposed enhancement has been completed.

## **7. Parties' Proposals**

As discussed above, the Commission finds that the IOUs have fulfilled their obligations under the Click-Through Resolution and made findings on whether or not to adopt certain proposals as proffered by the IOUs. In this section, the decision reviews other proposals made by non-IOU parties to this proceeding. All parties presenting proposals have informed the IOUs' applications through their participation in the CDAC.

### **7.1. Service Level Agreement**

Mission:data and OhmConnect both propose the establishment of a Service Level Agreement (SLA) between the IOUs and DRPs in which the CTP is useful and available 99.8 percent of the time and the data provided through the respective CTPs are the correct data for the correct customer 99.8 percent of the time. Mission:data and OhmConnect both argue that SLAs are an industry standard for IT systems, with Mission:data giving examples of the SLAs provided by large IT infrastructure suppliers and OhmConnect noting that Meter Data Management Agents, often the IOUs, are the sole source of customer meter data in California.<sup>66</sup>

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<sup>66</sup> MD-0500 at 12 and OHM-0601 at 2.

## **7.2. Enrollment Conflict Resolution at Authorization**

OhmConnect proposes that the IOUs add an additional webpage to the CTP after the authorization page for those customers that are already enrolled in a DR program. This webpage would notify these customers of an enrollment conflict and allow them to initiate the disenrollment process for their currently enrolled DR program. OhmConnect further claims that enrollment conflicts are the primary reason that customers cannot complete program enrollment.<sup>67</sup>

## **7.3. Sufficient Data to Enroll Customers Into Demand Response Providers Program and California Independent System Operator Demand Response Registration System Within 90 Seconds**

OhmConnect proposes that the IOUs provide sufficient data to enroll customers into the CAISO Demand Response Registration System (DRRS) with the initial summarized data set. OhmConnect notes that while SCE has not historically included the necessary data to enroll customers in the CAISO DRRS, namely the customer's Sub-LAP and Masked Service Account Identifier, it has proposed doing so in its updated testimony.<sup>68</sup> Additionally, OhmConnect argues that IOUs should be required to provide all historic DR program enrollment information for customers.<sup>69</sup>

## **7.4. Notification on Why Customers Fail to Complete Authorization**

OhmConnect, reiterating information provided in its protest and input at the CDAC, proposes that the IOUs should provide error codes to the DRPs

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<sup>67</sup> OHM-0601 at 14.

<sup>68</sup> *Ibid.* at 17.

<sup>69</sup> *Ibid.*

regarding why a customer fails to authorize data sharing on a case-by-case basis (*i.e.*, for each individual customer trying but failing to authorize third-party access to their data). OhmConnect claims that these error codes are industry-standard for the OAuth process.<sup>70</sup>

### **7.5. Other Party Proposals**

Mission:data proposes that the IOUs should not be able to change the customer-facing authorization experience of the CTP without Energy Division approval. Mission:data argues that this could go against previous Commission directives to prevent enrollment fatigue and to eliminate data access barriers.

Mission:data also proposes that the CTP testing environment proposed by SDG&E should be covered by shareholders, not ratepayers. Mission:data argues that this is a standard feature of IT platforms and should have already been implemented.<sup>71</sup>

OhmConnect proposes that DRPs be allowed to use IOU logos on the DRPs' login pages to add legitimacy to the CTP authorization pathway. OhmConnect cites the use of several company logos in those companies' affiliated OAuth services, including X (formerly known as Twitter), LinkedIn, Microsoft, and Amazon.<sup>72</sup>

Mission:data and OhmConnect both propose that there should be a common, public-facing website to communicate CTP outages and maintenance announcements. OhmConnect specifies that this page should include the

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<sup>70</sup> *Ibid.* at 18.

<sup>71</sup> MD-0500 at 16-20.

<sup>72</sup> *Ibid.* at 15.



impacted data elements, the days impacted, the estimated time to fix the issue, and the number or percentage of customers impacted.<sup>73</sup>

## **8. Disposition of Parties' Proposals**

Parties to this proceeding have provided scarce evidence or argument against the specific enhancements proposed by the IOUs in their applications. Instead, the parties focus their efforts on a number of additional proposals, discussed below.

### **8.1. Service Level Agreements and the Use of Investor-Owned Utilities' Logos on Demand Response Provider Login Pages Are Not Within the Scope of This Proceeding**

The Commission sees the importance of access to reliable customer data to both the DRPs and customers. However, the CTP's performance for the IOUs is contingent on several data streams that reflect the performance of the IOUs' broader respective data infrastructures. Setting performance requirements on the CTP may have sizable upstream impacts, the costs and effects of which are not addressed in the record of this proceeding. Establishing an SLA goes well beyond the CTP and warrants a broader discussion than is scoped into this proceeding. Therefore, requiring the IOUs to implement an SLA is deemed not within the scope of this proceeding and this decision will not address the argument on its merits.

Whether or not the IOUs should be required to allow third-party DRPs to use their logos in the CTP is not within the scope of this proceeding and therefore this decision does not address the merit of the argument.

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<sup>73</sup> OHM-0601 at 16.

**8.2. The Commission Adopts the Parties' Proposal to Require Energy Division Approval to Change Customer-Facing Authorization Experiences**

The time and effort expended by the stakeholders in the process to develop the CTP is substantial. This effort warrants an approach to CTP interface changes that is sensitive to customer needs and does not confer advantages on the IOUs. As such, the Commission directs the IOUs to confer with the CDAC and file a Tier 1 advice letter with the Commission when proposing any changes to the customer interface of the CTP that, at their discretion, the IOUs deem substantive.

**8.3. The Commission Declines to Adopt Parties' Proposal to Require Investor-Owned Utilities to Implement a Common Public-facing Website to Communicate Click-Through Process Outages and Maintenance Announcements**

Parties have not adequately shown the benefit to ratepayers of a single public-facing website to communicate CTP outages and maintenance announcements. No evidence has been provided of the necessity of this proposal nor harm done to customers from not implementing this proposal. Further, given that customers are typically served electricity by a single IOU at a time (*i.e.*, a customer would not be served electricity by both PG&E and SCE at the same time), the Commission struggles to see the benefit to customers of a single website. Therefore, the Commission declines to require IOUs to implement a common public-facing website to communicate CTP outages and maintenance announcements.

However, for the sake of transparency and accountability, the Commission sees value in providing information on CTP outages. The Commission directs the

IOUs to clearly communicate on their respective existing Rule 24/32 metrics websites all CTP outages, whether planned or unplanned. If an outage is planned, it must be communicated on the IOU's website as soon as the planned outage date(s) and time(s) are known. Unplanned outages must be communicated on the IOU's CTP/Rule 24/32 website in as close to real-time as possible and in no more than 24 hours from the commencement of the unplanned outage. For both planned and unplanned outages, the IOUs must provide the estimated time the outage will take to fix. If the estimated time to fix the outage is less than or equal to three days, it may be expressed in hours. Otherwise, the estimated time to fix the outage must be expressed in days. Additionally, for both planned and unplanned outages, the IOUs must provide the percentage of customers impacted by the CTP outage. Finally, a running list of all outages must be provided that includes, for each outage, whether the outage is planned or unplanned, the date and time the outage began, and the date and time the outage was fixed. The Rule 24/32 metric websites must be publicly accessible and reachable by web address alone (*i.e.*, not require any login or credential information to access).

#### **8.4. Demand Response Program Enrollment Conflicts Should Be Initiated Within the Click-Through Process Where Possible**

For DR to be a competitive, technology-neutral, and open market as envisioned in D.16-09-056,<sup>74</sup> customers must be able to provide access to their data to the DRP of their choosing with minimal friction and maximum portability. This need is echoed in SBUA's opening brief where it urges the Commission to "simplify the process of customers obtaining their choice of

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<sup>74</sup> D.16-09-056 at 46.

demand response program”<sup>75</sup> and this position is supported by SDG&E.<sup>76</sup> However, as noted by PG&E and SCE in their testimonies,<sup>77</sup> there are diverse DR programs governed by their own tariffs and these rules have different disenrollment requirements. This makes resolution of all enrollment conflicts at the time of authorization difficult, and no party has proposed a fully effective approach to overcome this difficulty.

However, initiating enrollment conflicts for customers enrolled in an IOU-administered DR program who are seeking enrollment with a third-party DRP-administered program seems feasible, with both OhmConnect and SDG&E providing possible solutions. Furthermore, given the IOUs’ role in managing customer data access and authorizations, the IOUs are in the best position to exercise an incumbency advantage to create barriers for customers wishing to disenroll from their program and enroll with a third-party competitor. The Commission sees value in providing customers information during the CTP data authorization process to make them aware of enrollment conflicts, provide a step-by-step guide to the disenrollment process, and the timeframe for disenrollment given the requirements of the DR program they are currently enrolled in. As such, the IOUs and relevant stakeholders are encouraged to utilize the CDAC as a venue to resolve issues related to enrollment conflicts and share progress in the CDAC towards this end with Energy Division staff.

An enrollment conflict resolution process may be proposed via Tier 2 advice letter.

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<sup>75</sup> SBUA Opening Brief at 6.

<sup>76</sup> SDG&E-0202 at TM-10.

<sup>77</sup> PG&E-0001 at 2-10 and SCE-0100 at 57.

**8.5. The Commission Declines to Require the Investor-Owned Utilities to Provide Notifications on Why Customers Fail to Complete Data Sharing Authorizations on a Case-by-Case Basis or Historical Demand Response Program Enrollment Information**

By definition, customers cannot have authorized the IOUs to share their data with DRPs prior to completion of the data authorization process (*i.e.*, the CTP). In order to protect the privacy of customers, the Commission declines to require the IOUs to provide notifications on why customers fail to complete data sharing authorizations on a case-by-case basis. This issue was raised by several parties, including Cal Advocates<sup>78</sup> and SBUA.<sup>79</sup>

Regarding OhmConnect's proposal to require the IOUs to provide all historic DR program enrollment for the customer, the Commission does not see the necessity of this proposal and it is therefore declined. As OhmConnect themselves note, this is not a requisite element to enroll customers in the DRRS nor is it necessary for DRP program enrollment.

**9. The Investor-Owned Utilities Comply with Commission Privacy Rules and California Privacy Laws**

The IOUs are bound by the Commission's privacy rules as well as California privacy laws, including the California Consumer Privacy Act of 2018 and Consumer Privacy Rights Act of 2020, California Civil Code Section 1798.00 through Section 1798.199.100. The IOUs claim to comply with these privacy rules and statutes in their applications. No parties dispute that the IOUs comply with privacy rules and statutes in the enhancements proposed in their applications.

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<sup>78</sup> CALA-0400 at 1-3.

<sup>79</sup> SBUA Opening Brief at 4-5.

The Commission therefore finds that the IOUs have complied with Commission privacy rules and California privacy laws and encourages the continued use of industry best practices on privacy.

## **10. Conclusion**

This decision largely approves the proposed enhancements to the CTP filed in the applications of PG&E, SCE, and SDG&E. This decision finds that the applications comply with OP 29 of Res. E-4868, Commission privacy rules, and California privacy laws. There are no safety considerations in this proceeding. Proposals submitted by intervenors, with some exceptions, are declined.

## **11. Comments on Proposed Decision**

The proposed decision of ALJ Lakey 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 September 7, 2023, and reply comments were filed on September 12, 2023, by Leap, Mission:data, OhmConnect, PG&E, SDG&E, and SCE. SBUA filed comments on September 7, 2023. Changes have been made throughout the decision in response to these comments.

## **12. Assignment of Proceeding**

John Reynolds is the assigned Commissioner and Jonathan L. Lakey is the assigned ALJ in this proceeding.

## **Findings of Fact**

1. There are diverse DR programs governed by their own tariffs and these rules have different disenrollment requirements.
2. Customers cannot have authorized the IOUs to share their data with DRPs prior to completion of the CTP data authorization.
3. No evidence has been provided of the necessity of the proposal to establish a single public-facing website that shares information on CTP outages, nor harm

done to customers from not implementing this proposal, as customers are typically served electricity by one utility at a given time.

4. No parties dispute that PG&E, SCE, and SDG&E comply with privacy rules and statutes in the enhancements proposed in their applications.

### **Conclusions of Law**

1. PG&E, SCE, and SDG&E complied with OP 29 of the Click-Through Resolution.

2. PG&E's proposed enhancements to the CTP, with some exceptions, are reasonable.

3. PG&E's proposal for cost recovery on third party role-based data access should be denied as this issue is out of the scope of this proceeding.

4. PG&E should establish a memorandum account as the CTP cost recovery mechanism.

5. SCE's proposed enhancements to the CTP are reasonable.

6. SDG&E's proposed CTP enhancements are reasonable.

7. PG&E, SCE, and SDG&E should not be able to change the customer-facing authorization experience of the CTP without Energy Division approval, in order to ensure that the changes do not contradict previous Commission directives to prevent enrollment fatigue and to eliminate data access barriers.

8. PG&E, SCE, and SDG&E should provide information on planned and unplanned outages of the CTP for the sake of transparency and accountability.

9. For customers to be able to provide access to their data to the DRP of their choosing with minimal friction and maximum portability, PG&E, SCE, and SDG&E should provide customers information during the CTP data authorization process to make them aware of enrollment conflicts, an overview

of the disenrollment process, and the timeframe for disenrollment given the requirements of the DR program they are currently enrolled in.

10. SDG&E should avoid the use of pathways for customers to cancel data authorizations, such as a single hyperlink click, that deviate from SDG&E's existing pathways as these other pathways may disadvantage third-party DRPs by making it easier for customers to inadvertently cancel their data sharing authorizations.

11. PG&E, SCE, and SDG&E have complied with Commission privacy rules and California privacy laws.

## **O R D E R**

**IT IS ORDERED** that:

1. Pacific Gas and Electric Company (PG&E) must file an information-only advice letter within 120 days of the issuance date of this decision with a table providing the following information but excluding reference to the third-party role-based data access enhancement proposed by PG&E:

- a. A complete, itemized list of the enhancements proposed in its present application;
- b. The estimated cost for each proposed enhancement;
- c. The actual cost for completed enhancements;
- d. The estimated completion date for each proposed enhancement;
- e. The actual completion date for completed enhancements;  
and
- f. Whether the proposed enhancement has been completed.

2. PG&E must establish a memorandum account as its CTP cost recovery mechanism.



3. Southern California Edison Company must file an information-only advice letter within 120 days of the issuance date of this decision with a table providing:

- a. A complete, itemized list of the enhancements proposed in its present application;
- b. The estimated cost for each proposed enhancement;
- c. The actual cost for completed enhancements;
- d. The estimated completion date for each proposed enhancement;
- e. The actual completion date for completed enhancements;  
and
- f. Whether the proposed enhancement has been completed.

4. San Diego Gas & Electric Company must file an information-only advice letter within 120 days of the issuance date of this decision with a table providing:

- a. A complete, itemized list of the enhancements proposed in its present application;
- b. The estimated cost for each proposed enhancement;
- c. The actual cost for completed enhancements;
- d. The estimated completion date for each proposed enhancement;
- e. The actual completion date for completed enhancements;  
and
- f. Whether the proposed enhancement has been completed.

5. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must each confer with the Customer Data Access Committee and file a Tier 1 advice letter with the Commission when proposing any changes to the customer interface of the Click-Through Process that, at its discretion, the investor-owned utility deems substantive.

6. Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must each clearly communicate on their

respective existing Rule 24/32 metrics websites all Click-Through Process outages, whether planned or unplanned. If an outage is planned, it must be communicated on the respective investor-owned utility's website as soon as the planned outage date and times are known and in no more than 24 hours from when the planned outage date and times are known. Unplanned outages must be communicated on the respective Rule 24/32 metrics websites in as close to real-time as possible and in no more than 24 hours from the commencement of the unplanned outage.

7. Application 18-11-015, *et al.* is closed.

This order is effective today.

Dated \_\_\_\_\_, at Sacramento, California

# APPENDIX

**ACRONYMS**

<b>ACRONYM</b>	<b>TERM</b>
API	Application Programming Interface
BRRBA	Base Revenue Requirement Balancing Account
CAISO	California Independent System Operator
CCA	Community Choice Aggregator
CDABA	Customer Data Access Balancing Account
CDAC	Customer Data Access Committee
CEDMC	California Efficiency + Demand Management Council
CISR	Customer Information Service Request
CISR-DRP	Customer Information Service Request for Demand Response Provider
CSV	comma-separated value
CTP	Click-Through Process for electronic signature authorization
DA	Direct Access
DERP	Distributed Energy Resource provider
DPDRMA	Direct Participation Demand Response Memorandum Account
DR	demand response
DRP	Demand Response Provider
DRRS	Demand Response Registration System
EMP	Energy Management provider
ERRA	Energy Resource Recovery Account
ESP	Electric Service Provider
ESPI	Energy Services Provider Interface
ETL	extract, transform, and reload
GBC	Green Button Connect
IaaS	Infrastructure-as-a-Service

<b>ACRONYM</b>	<b>TERM</b>
IOU	investor-owned utility
IT	information technology
O&M	operation and maintenance
OAuth	Open Authorization
OCM	Organizational Change Management
ODS	Operational Data Store
PDF	Portable Document Format
PG&E	Pacific Gas and Electric Company
RPBA	Rewards and Penalties Balancing Account
RQMD	revenue quality meter data
SBUA	Small Business Utility Advocates
SCE	Southern California Edison Company
SDG&E	San Diego Gas & Electric Company
SLA	Service Level Agreement
SMD	Share My Data
XML	Extensible Markup Language

**(END OF APPENDIX)**