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SoCalGas Comments on Title 20 Data Collection Pre-Rulemaking Staff Workshop

Additional submitted attachment is included below.



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California Energy Commission
Docket Office
1516 Ninth Street
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Subject: SoCalGas Comments on Title 20 Data Collection Pre-Rulemaking Staff Workshop, Docket No.16-OIR-03

Dear Commissioner McAllister:

The Southern California Gas Company (SoCalGas) thanks the California Energy Commission (CEC) for hosting the Title 20 Data Collection Pre-Rulemaking Staff Workshop, as part of the Increasing Access to Energy Data Proceeding, on September 26, 2016. This workshop focused on changes to data collection regulations to support increased analytical needs and help the CEC implement provisions within Senate Bill (SB) 350 and Assembly Bill (AB) 802.

SoCalGas supports the state's efforts to reduce greenhouse gas (GHG) emissions and is actively participating in the numerous proceedings across the state agencies that are working on developing the policy direction and implementation of SB 350 and AB 802. However, for this implementation effort to be successful to increase access to energy data, the CEC must consider the availability of data that SoCalGas collects and treatment of this data due to confidentiality provisions that SoCalGas is required to uphold. SoCalGas offers the following modifications to the draft regulatory language proposed by the CEC for implementation of electricity and natural gas demand forecasting under SB 350, AB 802, and existing law.

Comments

The draft language proposes new regulations in Section 1308, Quarterly Gas Utility and Electric Generator Tolling Agreement Reports. Section 1308 §§ (d) creates a new threshold for a gas utility with annual natural gas deliveries of 200 million therms or more in both of the two calendar years preceding the required data filing to provide the following monthly customer demand and billing data based on customer class as identified in the proposed language for all natural gas sold or transported by the gas utility during each of the previous three months as follows:

- a. service address of account number, including the street address, city, state, and zip code;
- b. premise identification number;
- c. meter identification number;
- d. volume of natural gas delivered in therms;
- e. monthly bill total (dollars);
- f. customer classification code;
- g. energy efficiency program participation identification; and
- h. building meter code.

SoCalGas seeks to provide clarification on the treatment of this protected data in regards to confidentiality. Data elements such as “service address of account number, including the street address, city, state, and zip code” must be provided confidentially to protect privacy rights in the absence of express consent from our customers, under Civil Code §1798.80, et seq.; Civil Code §§ 1798.3; Civil Code §§1798.24; Gov’t Code § 6254(c); Gov’t Code § 6255, and California Constitution Article I, § 1.

Gas usage information (e.g., “volume of natural gas delivered in therms”) when combined with an identifier (which can be used to identify an individual, family, household, residence, or non-residential customer) must be treated as confidential under Civil Code §§1798.98-1798.99, Civil Code §1798.80, et seq., and Pub. Util. Code § 8380(d). Pursuant to the CPUC Smart Grid Phase II Decision (D. 12-08-045), the data is considered “Covered Information” and must be treated as confidential. As context, “Covered Information” is defined as any usage information obtained through the use of Advanced Metering Infrastructure capabilities when associated with any information that can reasonably be used to identify an individual, family, household, residence, or non-residential customer. Covered Information does not include usage information from which identifying information has been removed such that an individual, family, household or residence, or non-residential customer cannot reasonably be identified or re-identified. To request the data identified in Section 1308 §§ (d), the CEC must ensure that the data will be kept confidential according to the aforementioned regulations.

Additionally, Section 1308 §§ (e) has been added to require:

(e) Monthly Pipeline Delivery Information.

Each gas utility with annual natural gas deliveries of 200 million therms or more in both of the two calendar years preceding the required data filing shall, beginning March 18, 2018 report for each month during the previous quarter the following for all natural gas volumes delivered by such company to locations in California or at the California border on each distribution pipeline segment:

1. Natural gas characteristics
 - a. chemical composition
 - b. specific gravity

- c. maximum mass/molar flow rate
- 2. Pipeline segment characteristics
 - a. monthly average and maximum inlet pressure
 - b. monthly average and maximum outlet pressure
 - c. monthly average and maximum flow volumes
 - d. monthly any and all changes to the natural gas distribution system, including changes in length, maximum operating pressure, and pipeline characteristics.

The monthly pipeline delivery data relating to natural gas characteristics proposed in Section 1308 §§ (e)(1) are not currently collected by SoCalGas. Gas delivered into the SoCalGas system must comply with the gas quality standards provided in SoCalGas Rule No. 30. Because gas quality is monitored at the points of delivery from suppliers, gas quality delivered to the distribution system and to end-use customers is not measured, and would not be available for reporting under these proposed Title 20 data collection requirements.

Pipeline segment characteristics data proposed in Section 1308 §§ (e)(2)(a)-(c) is also not collected. SoCalGas has thousands of taps on its transmission system. Distribution systems are designed to operate at defined Minimum Operating Pressures (MinOPs) on the transmission system, so pressures to those taps are not an operational concern as long as the MinOP is not violated, and thus are not recorded and/or retained. Outlet pressures and volumes are also not recorded and/or retained. The distribution systems are planned and designed to serve customer demand under forecast peak demand conditions; pressure and flow under other demand conditions serves no operational purpose.

Changes to the natural gas distribution system as proposed in Section 1308 §§ (e)(2)(d) are not recorded on a monthly basis. The SoCalGas distribution system consists of nearly 100,000 miles of pipeline and services. Changes are made for a variety of reasons including customer growth, changing demand patterns, and pipeline maintenance. Compiling all changes to the distribution system is resource intensive and burdensome, and would be of little value given the lack of available data required in Section 1308 §§ (e)(2)(a)-(c).

Conclusion

For the reasons provided above, SoCalGas respectfully requests the CEC provide proper confidentiality treatment of customer demand and billing data requested within Section 1308 §§ (d) and modify its proposed data collection requirements to remove Section 1308 §§ (e), as this data is not collected and would not be of value to the Commission.

Sincerely,

/s/ Tim Carmichael

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