

## DOCKETED

<b>Docket Number:</b>	16-OIR-03
<b>Project Title:</b>	Energy Data Collection
<b>TN #:</b>	214944
<b>Document Title:</b>	SoCalGas Comments on Title 20 Data Collection Regulations
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	The Southern California Gas Company (SoCalGas)
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	12/20/2016 10:38:56 AM
<b>Docketed Date:</b>	12/20/2016

*Comment Received From: Tim Carmichael*

*Submitted On: 12/20/2016*

*Docket Number: 16-OIR-03*

## **SoCalGas Comments on Title 20 Data Collection Regulations**

*Additional submitted attachment is included below.*



Tim Carmichael  
Agency Relations Manager  
State Government Affairs

925 L Street, Suite 650  
Sacramento, CA 95814  
Tel: 916-492-4248  
*TCarmichael@semprautilities.com*

December 19, 2016

California Energy Commission  
Docket Office  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Subject: Comments on Title 20 Data Collection Regulations, Docket No.16-OIR-03**

Dear Commissioners:

The Southern California Gas Company (SoCalGas) thanks the California Energy Commission (CEC) for the opportunity to comment on the Commissioner Workshop on Title 20 Data Collection Regulations to Support Increased Analytical Needs, held on November 16, 2016 in the Increasing Access to Energy Data Proceeding.

SoCalGas supports the goals of Senate Bill (SB) 350 and Assembly Bill (AB) 802 and recognizes the importance of improving data collection to enhance demand forecasting efforts and inform long-term planning and policy-making. However, the Legislature also has directed the CEC to minimize the data it collects in order to protect personal privacy and confidentiality and to reduce duplicative, unnecessary and burdensome reporting obligations on the entities and consumers from which the CEC collects the data.<sup>1</sup> As such, SoCalGas recommends that the CEC work collaboratively with all parties to accomplish the goals of SB 350 and AB 802 in a manner that protects customer privacy and confidentiality, and utilizes resources responsibly and efficiently.

**I. CUSTOMER DATA COLLECTION**

SoCalGas echoes the concerns provided by San Diego Gas & Electric Company (SDG&E) in their submitted comments<sup>2</sup> regarding protection of customer privacy and the volume of data being proposed by the CEC, which applies to both gas and electric utility customers. Specifically, SoCalGas emphasizes the following concerns regarding the CEC's proposal to expand California Code of Regulations, Title 20, Sections 1301 et seq. to include customer-specific details.

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<sup>1</sup> Public Resources Code Section 25320.

<sup>2</sup> SDG&E Comments on Title 20 Data Collection Regulations to Support New Analytical Needs. Filed December 12, 2016. Docket: 16-OIR-03

1. Volume and Complexity

The sheer volume of data that needs to be gathered, cleaned and transmitted electronically may prove problematic. The task is overly burdensome and would require a large volume of data cleaning. In addition, data that has been gathered and transmitted that undergoes a billing correction in the months that follow would then need to be tracked and any corrections would need to be packaged and transmitted to the CEC. This effort has the potential to become an increasing on-going analysis of what data was previously provided and what has been updated. In essence, generating a summary record for each utility customer along with a monthly correction file is analogous to developing a parallel billing system.

2. Cyber Security

Cyber security risk (including hacking and other forms of unauthorized access to sensitive information) is essentially doubled when utility customer information is maintained in two different places, by two different entities (the utility and CEC). SoCalGas will maintain its own master billing file and the CEC will maintain a summary record version of the same file. This poses a potential risk whereby customer specific information may be inappropriately disclosed due to a cyber-attack by outsiders. As the CEC is aware, this information is of great value to a growing number of third parties, some whose unauthorized access to such information could cause significant harm to SoCalGas customers as well as the utility itself.

3. Confidentiality and Privacy

With regard to confidentiality, there is nothing in the Proposed Language that automatically grants and guarantees that these data will be kept confidential. The expectation is that each provider of such data will submit an application requesting confidentiality along with the data being provided. SoCalGas believes that confidentiality must be granted and guaranteed prior to submitting these data.

As discussed in SoCalGas' previously filed comments on the Title 20 Data Collection<sup>3</sup>, 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 California Public Utilities Commission (CPUC) Smart Grid Phase II Decision (D. 12-08-045), the data is considered "Covered Information" that must be treated as confidential. 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 and CPUC decision language.

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).

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<sup>3</sup> SoCalGas Comments on Title 20 Data Collection Pre-Rulemaking. Filed October 17, 2016. Docket: 16-OIR-03

## II. NATURAL GAS INFRASTRUCTURE DATA COLLECTON

The CEC proposes changes to Section 1308(e) to require new data from natural gas utilities to support modeling activity. SoCalGas provides the following concerns on data security and issues with hydraulic modeling:

### 1. Data and Infrastructure Security

The SoCalGas and SDG&E gas transmission hydraulic model is a detailed representation of the utilities' gas transmission system, and as such, contains information and data that, if unintentionally released, represents a significant security risk to the integrity of the transmission system and individual customer-specific information. The model is detailed enough to identify key gas infrastructure vulnerabilities and the largest natural gas customers, which may be exploited by parties, even inadvertently, and pose security risks to other parts of the southern California infrastructure and economy beyond the risk to the gas transmission system.

### 2. Hydraulic Model Complexities

The operation of the model requires a deep understanding of both the characteristics and functions of the modeling software and the operation and design of the gas transmission system, such as minimum and maximum pressure limitations, compressor station parameters, and valve station capacities. The process of executing different operating scenarios within the hydraulic model is iterative, requiring multiple variations of operating parameters that mimic what the Gas Control Operators actually do to operate the system. Without this operating knowledge, results of the hydraulic model may be inaccurate, potentially providing results that are impossible to replicate on the actual transmission system. Furthermore, the design and operation of the transmission system is not static. Modifications are made to both the physical state of the system and gas operations to accommodate changing customer demand patterns, supply delivery preferences, and facility outages. This requires close and frequent communication between the operating departments and the engineering staff performing hydraulic analyses, to ensure accurate results are produced.

New engineers are first trained in the use of the software by the software vendor. This represents the easiest and quickest stage of training. Following that, on-the-job training continues with the assignment of increasingly complex projects and the institutional knowledge of and assistance from other experienced staff engineers and the manager. This training stage lasts a minimum of one year before the engineer can be considered knowledgeable enough in the operation of the transmission system to be able to produce accurate modeling results.

For the reasons provided above, SoCalGas respectfully requests the CEC reconsider plans to mandate submission of sensitive data. SoCalGas also strongly recommends that CEC hold additional working groups with stakeholders to discuss how to best meet the goals of SB 826 and SB 839.

In conclusion, SoCalGas appreciates the willingness of the CEC to have discussions with parties, as consideration of the amended data collection regulations moves forward. In addition to these comments, we provide responses as appropriate to questions posed in the workshop in Attachment A. We look forward to participating in ongoing dialogue with the CEC as the rulemaking proceeds.

Sincerely,

/s/ Tim Carmichael

Tim Carmichael  
Agency Relations Manager  
State Government Affairs

#### **4. Load Research Reporting: Interval Meter**

**Please describe the implementation of green button data across the different utilities? How long are data retained?**

SoCalGas launched its “Green Button Download My Data<sup>®</sup>” (DMD) feature within the SoCalGas “My Account” customer portal in 2013, concurrent with the beginning of its Advanced Meter deployment, which is still underway. The Green Button DMD tool is available to SoCalGas customers who have an activated Advanced Meter installed at their homes or businesses. The Green Button DMD tool is available to registered My Account customers within the “Ways to Save,” “Analyze Usage” section of My Account. Through the Green Button DMD tool, SoCalGas customers with Advanced Meters can download up to 13 months of their interval gas usage data.

#### **5. Natural Gas Distribution**

**What data are collected and sampled to ensure gas injected into the natural gas distribution system meets specifications?**

Gas supplies that enter the transmission system are sampled and analyzed to determine if they meet the gas quality specification in their contractual agreement. Gas supplies are monitored for heating value, specific gravity, nitrogen, and carbon dioxide for measurement purposes. When there is the potential for the supply to exceed the limit for other parameters, such as, hydrogen sulfide, that gas supply is monitored for hydrogen sulfide. If the supply exceeds the specification, the supply is denied access. At the interstate supplies, the gas is also monitored for mercaptan sulfur for supplemental odorization purposes and for gas quality specification purposes.

**How are natural gas pressures and losses monitored across the distribution network?**

SoCalGas and SDG&E’s Gas Control Department is responsible for real-time operation and control of gas flow through the SoCalGas and SDG&E natural gas transmission system. The department is staffed on a 24-hour, 7-day-a-week, 365-day-a-year basis, utilizing a specialized Supervisory Control and Data Acquisition (SCADA) network where operator qualified Systems Gas Controllers monitor and control the system through a Human-Machine Interface. The SCADA system provides remote monitoring and operation of valves, compressors, pressure regulation equipment, and gas flow across the system, while monitoring instrumentation and analytical tools for real-time assessment of the state of the gas transmission system.

**What are current best practices for leak identification?**

SoCalGas has a long-standing commitment to reducing methane emissions from our natural gas system. SoCalGas was one of the nation’s first participants of the Energy Protection Agency’s Natural Gas STAR Program in 1993. This voluntary program to control methane emissions successfully identified emission sources and mitigation methods and has resulted in significant

CO<sub>2</sub>e reductions every year since the program began. To further these gains, SoCalGas is implementing a number of best practices and new technologies, which are described in detail in our Natural Gas Leakage Abatement Report filed with the CPUC,<sup>4</sup> and summarized below.

**Leak Surveys-** SoCalGas has improved its ability to identify business districts which require annual leak surveys by using algorithms and outside land development data in its enterprise Geographic Information System (eGIS).

- This system enhancement has resulted in the increased distribution mileage that is surveyed annually; now approximately 36% of the 100,000+ miles of Distribution Main and Service pipelines are surveyed annually or bi-annually with the remaining 64% scheduled at 3- or 5-year intervals.
- The frequency of leak surveys is determined by the pipe material involved (i.e. plastic or steel), the operating pressure, whether or not the pipe is under cathodic protection, and the proximity of the pipe to various population densities.
- Annual surveys are scheduled in business districts, which are defined as a principal business area in a community where large numbers of people regularly congregate to engage in business activities, and near public service establishments, such as schools, churches, and hospitals. Three-year survey cycles are used for all cathodically unprotected mains and services. Five-year survey cycles are typically used for plastic and cathodically protected steel mains and services installed in residential areas.
- In addition to routine leak surveys, SoCalGas performs special leak surveys, as needed, and on more frequent cycles than those discussed above (e.g., two, three, or six months). Examples of this work include conducting leak surveys after the occurrence of any significant incident such as an earthquake.

**Leak Survey Technologies-** SoCalGas is a leader in using, or supporting the development of, many new technologies that allow the company to detect and repair non-hazardous leaks more quickly than ever. Some of these include:

- Special fiber optic cable that detects methane leaks and third-party damage to pipelines;
- Infrared “point” sensors that can detect leaks before they can be smelled by people;
- Using infrared cameras to check for leaks after new pipelines are installed;
- Using drones and other methods of aerial survey to spot emissions from above;
- Employing algorithms that use our Advanced Meter system to identify unusual levels of natural gas consumption at customers’ homes or businesses which could indicate a leak.

Further, SoCalGas has funded research to develop or assess Mobile Leak Quantification technologies in projects with Picarro, Washington State University, Colorado State University, and PSI/Heath through NYSEARCH research and development (R&D) collaborative projects.

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<sup>4</sup> Natural Gas Leakage Abatement Report, filed by Southern California Gas Company, on June 17, 2016, in partial fulfillment of (R.) 15-01-008 to Adopt Rules and Procedures Governing Commission Regulated Natural Gas Pipelines and Facilities to Reduce Natural Gas Leaks Consistent with Senate Bill 1371, Leno.  
[https://socalgas.com/regulatory/documents/r-15-01-008/R1501008\\_SoCalGas%202016\\_Annual\\_Report.pdf](https://socalgas.com/regulatory/documents/r-15-01-008/R1501008_SoCalGas%202016_Annual_Report.pdf)



Investing in the latest studies supports improved quantification and emission reduction efforts in the long term.