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<b>Project Title:</b>	Load Management Standards Implementation
<b>TN #:</b>	261135
<b>Document Title:</b>	Los Angeles Department of Water and Power Comments - The Load Serving Entities' October 1, 2024, Plan for a Single Statewide Rate Access Tool
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*Comment Received From: Los Angeles Department of Water and Power  
Submitted On: 1/17/2025  
Docket Number: 23-LMS-01*

**The Load Serving Entities' October 1, 2024, Plan for a Single  
Statewide Rate Access Tool**

*Additional submitted attachment is included below.*

**BEFORE THE ENERGY COMMISSION  
OF THE STATE OF CALIFORNIA**

In the matter of:	)	Docket No. 23-LMS-01
	)	
Load Management Standards	)	RE: Request for Comment on the Load
Implementation	)	Serving Entities' October 1, 2024, Plan
_____	)	for a Single Statewide Rate Access
	)	Tool

**COMMENTS FROM THE LOS ANGELES DEPARTMENT OF WATER AND POWER  
TO THE CALIFORNIA ENERGY COMMISSION REGARDING  
REQUEST FOR COMMENT ON THE LOAD SERVING ENTITIES' OCTOBER 1, 2024, PLAN FOR A  
SINGLE STATEWIDE RATE ACCESS TOOL**

Dated: January 17, 2025

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**INTRODUCTION**

The City of Los Angeles (City of LA) is a municipal corporation and charter city organized under the provisions set forth in the State of California (State) Constitution. The Los Angeles Department of Water and Power (LADWP) is a proprietary department of the City of Los Angeles (LA), pursuant to the Los Angeles City Charter, whose governing structure includes a Mayor, a City Council, and a Board of Water and Power Commissioners. LADWP is the third largest electric utility in the State, one of five California Balancing Authorities, and the nation's largest municipal utility, serving a population of over four million people within a 478 square mile service territory that covers the City of LA and portions of the Owens Valley. LADWP supports the growth and vitality of the City of LA, its residents, businesses, and the communities we serve, and provides safe, reliable, and cost-effective water and power in a customer-focused and environmentally responsible manner.

LADWP appreciates the opportunity to provide specific comments on the California Energy Commission's (Commission) November 18, 2024, Request for Comment on the Load Serving Entities' October 1, 2024, Plan for a Single Statewide Rate Access Tool (Request for Comment).

## SPECIFIC COMMENTS

LADWP files these comments in response to the following questions found in Attachment A of the Request for Comment.

### A. Design

*Q6: Should any additional customer information (e.g., historical interval meter data) be available through the statewide rate tool? If so, what? At what frequency should any additional data be available and at what frequency should it be updated? For example, "The statewide rate tool should include hourly meter data from the customer's meter and hourly distribution-level congestion measurement for the customer's meter. These data should be updated daily such that the previous day's data is always available."*

From a cybersecurity perspective, it is better to limit the information provided, and only enough information should be provided to enable the statewide rate tool's functionality.

### B. Authentication, customer authorization, privacy and security

- 1) *Q7: What approach do you recommend for authentication? Single sign on, one time passcode, or something else?*

LADWP recommends a Multifactor Authentication (MFA) approach. This requires a password and a second form of authentication via a one-time passcode using either an application that provides the passcode or a text message.

- 2) *Q8: What are the privacy and security concerns for the statewide rate tool? How should they be addressed?*

Despite the need to seek customer consent to obtain a customer's confidential information, there is a risk that sensitive customer information could potentially be disclosed beyond the terms of such consent by a Third Party service provider, either intentionally or unintentionally. Therefore, sensitive customer information should only be included if it is needed for the functionality of the statewide rate tool.

Further, the statewide rate tool should ensure that sufficient administrative, technical, and physical security controls are in place to protect customer information. Administrative controls involve the creation and enforcement of security policies, rules, procedures, and guidelines that are set by senior leadership; e.g., security policies, awareness training programs, and incident response plans. As described in the LSEs' plan, both the CEC and individual LSEs may establish administrative controls. Technical controls are controls that organizations put in place to safeguard their network, systems, and data; e.g., firewalls, anti-malware software, and encryption. Also, sensitive information should be encrypted in transit and at rest by default and masked if displayed. Physical controls refers to the controls that organizations implement to

physically protect their assets; e.g., building security, video surveillance, and physical access control systems.

Automation Service Providers (ASPs) and other Third Party service providers should also follow established cybersecurity frameworks, such as the National Institute of Standards and Technology (NIST) Cybersecurity Framework (CSF), and undergo annual security audits, such as those of Systems and Organization Controls 2 (SOC 2) security framework.

Finally, ASPs and other Third Party service providers should undergo regular vulnerability scanning and penetration testing exercises. All application vulnerabilities need to be fully patched and hardened prior to going live or the deployment of new code.

- 3) *Q9: How should service providers register to gain access to the statewide rate tool? What are appropriate and reasonable requirements for access (or reasons to deny access)? Are there examples that could be followed?*

ASPs and other Third Party service providers seeking to access the tool should be granted access through a trusted party or sponsoring party that can validate the request. The methodology used by E-ISAC is a good example. When someone (the requestor) from an organization is requesting access to E-ISAC, the administrator from E-ISAC will reach out to someone else (the approver, who is trusted by E-ISAC) in that organization for approval prior to granting or denying access to the requestor. LADWP agrees that both the CEC and individual LSEs serving the customer should approve access by a particular Third Party service provider.

- 4) *Q10: Does the LSEs' proposal appropriately address customer authorization? Why or why not? If not, what approaches do you recommend for ensuring the customer is authorizing the service provider to look up their rate information?*

Yes, the methodology stated in the LSEs' October 1, 2024, statewide rate tool documents is sufficient.

C. Terms and conditions

- 1) *Q14: What are appropriate limitations or requirements for data sharing, retention, storage, and privacy?*

LADWP is committed to the protection of any customer data which is considered as personal identifying information (PII). In general, any data should not be shared without customer consent. Additionally, ASPs and other Third-Party service providers should not retain or store customer information beyond the terms of customer consent, and such data should be permanently deleted once the data is no longer needed.

## **CONCLUSION**

LADWP appreciates the opportunity to participate in this rulemaking process and looks forward to working with the Commission to develop a statewide rate tool as a component of appropriate and effective regulations that will benefit the health, safety, and security of all California residents. If you have any questions, please contact Silvia Lozano at (213) 367-0787 or Alex Geronilla at (213) 367-8082.

Dated: January 17, 2025

Respectfully Submitted,

*Silvia Lozano*

Silvia Lozano (Jan 17, 2025 13:45 PST)

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*Norma Grubb*

Norma Grubb (Jan 17, 2025 12:57 PST)

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