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**PG&E Comments RE CEC Energy Data Analysis Program
Workshop**

Additional submitted attachment is included below.



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24 February 2025

California Energy Commission
Docket Number 25-EDAP-01
715 P Street
Sacramento, CA 95814

RE: CEC Energy Data Analysis Program Workshop

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to comment on the California Energy Commission's (CEC) Energy Data Analysis Program Workshop held on 10 February 2025.

We are looking forward to opportunities for continued engagement as the CEC further develops the Energy Data Analysis Program. PG&E would especially appreciate additional information and discussion on the topics outlined below.

Clarification of CCPA Liability if there is a breach from an agent

PG&E appreciates the emphasis on cybersecurity and secure data handling to prevent data breaches. PG&E would like to further discuss how to protect the entities who provide confidential customer information to the CEC from CCPA liability if the CEC's agent were to experience a data breach. While the proposed template agreement between the CEC and its agent addresses CCPA, PG&E would like clarification on what CCPA compliance for an agent of a government entity that is not subject to the CCPA means.

Clarification of how the agent's analytical work on data collected under Title 20 is authorized under Title 20

PG&E understands the efficiencies and benefits of the CEC performing data analytics on Title 20 data that both advances clean energy research and development and enhances privacy and security of sensitive data. We would appreciate further discussion on how this use case of the expansive data provided under Title 20 is authorized by Title 20 and the precedent it sets for further uses cases of Title 20 data.

Clarification of the process/standards for determining whether results are appropriately privatized or meet requirements for releasing confidential data prior to release to the Government Entity (GE).

PG&E respectfully requests further discussions and understanding around the CEC's proposed process and standards for privatizing data or how they meet legal and regulatory requirements around the release of confidential data as noted in the workshop presentation.

Whether Agents will be required to have cyber-incident insurance

PG&E is encouraged that the CEC has stated that it will require its agents to meet industry-standard cybersecurity certifications. PG&E also believes there should be a cyber incident insurance requirement for any agents who have access to this data.

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PG&E appreciates the opportunity to respond to this workshop and looks forward to continuing to collaborate with the CEC. Please reach out to me if you have any questions.

Sincerely,

Josh Harmon
State Agency Relations