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Additional submitted attachment is included below.



Tim Carmichael
Agency Relations Manager

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

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California Energy Commission
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RE: SDG&E Comments on Title 20 Data Collection Regulations to Support New Analytical Needs Docket: 16-OIR-03

The California Energy Commission (CEC) conducted a workshop on November 16 to discuss and seek comments from interested parties regarding energy data collection to support the implementation of Senate Bill 350, Assembly Bill 802, and improved California energy analytics. While SDG&E appreciates the CEC's efforts to implement enhanced data collection, in an effort to support implementation, SDG&E has several concerns regarding customer privacy and the volume of data being proposed as discussed herein.

Section 1306 LSE and UDC Reports, and Customer Reports:

The CEC's demand forecasting staff believes they need customer specific detail for all of a Load Serving Entity's (LSE) or Utility Distribution Company's (UDC) customers in order to carry out hourly forecasting and monitoring and analyze sublevels of customer characteristics and consumption. SDG&E understands the CEC's desires but has reservations and concerns over expanding the Quarterly Fuel and Energy Report (QFER) requirement to such a detailed level.

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 LSE/UDC customer along with a monthly correction file is analogous to developing a parallel billing system.

2. Authority to Collect Certain Data Elements

LSEs and UDCs may not have the legal authority to ask customers to provide some of the data elements the regulation seeks, especially when it comes to behind-the-meter

equipment. For example, identifiers for photovoltaic customers (registered to address, owned or leased), and Energy Storage (ES) identifier (owned or leased).

3. Cyber Security, Confidentiality and Privacy

Cyber security risk (including hacking and other forms of unauthorized access to sensitive information) is essentially doubled when information on each utility customer is kept in two different places, by two different entities (SDG&E and CEC). SDG&E will have its own master billing file and the CEC will have a summary record version of the same file. This poses a potential risk whereby customer specific information may be inappropriately released 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 SDG&E customers as well as the utility itself.

With regard to confidentiality, there is nothing in Section 1306 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. SDG&E believes that confidentiality must be granted and guaranteed prior to submitting these data.

An additional concern regarding confidentiality is that the CEC and CPUC have two different sets of rules and procedures for requesting and granting confidentiality. This makes it very difficult to comply with requests such as these where the rules and procedures may be contradictory. For instance, the Smart Grid Privacy Decision directs SDG&E to implement industry-standard privacy principles for the protection of customers' energy usage data (referred to as "covered information"), including the principles of Data Minimization, Purpose Specification and Data Security. Pursuant to this decision, it is incumbent upon SDG&E to share only the minimal amount of information required to perform a task. SDG&E is also obligated to ensure that the information being shared is only being used for the specific purpose under which it was shared. Finally, SDG&E is mandated to ensure that recipients of covered information are using safeguards that are no less protective than those the utility uses to protect the same information.

To avoid these issues, SDG&E respectfully suggests that instead of asking for customer-by-customer detail, this regulation might contemplate guidelines that provide a means by which the CEC can request LSE/UDC assistance whenever they have research needs that require working with a narrowly defined subset of customer data. The LSE/UDC might then be more empowered to assist in performing the research transmitting the results.

Section 1343 Energy End User Data: Survey Plans, Surveys, and Reports.

SDG&E respectfully suggests the following:

1. Section 1343 (a)(3)(D) states that when the CEC acts as project manager it may require the IOU to provide funds to help carry out the project. SDG&E believes it would help if the regulation required the CEC to give the IOU an advance notification as to when funds will be needed and an approximate amount. This would aid the IOU in anticipating funding needs and provide for accurate planning.

2. Section 1343 (f)(1) and Section 1343 (f)(2) both state that each utility or UDC shall submit reports that stem from analyzing survey data that was collected and processed. SDG&E believes that under the survey option where the CEC becomes the project manager, the CEC should be responsible for performing this task, not the utility or UDC.

Section 1344 Load Metering Reports.

Subsection 1344(a): Hourly data requirements.

Many data elements specified in subsections (d) through (h) have never been asked for before, and some that are being asked for now simply don't exist or exist but have not been collected by LSEs or UDCs, including SDG&E. Calculating these values that don't exist will no longer be a data dump, but rather an analysis effort requiring additional time and resources. If data changes over time, it may have an effect on the calculated data and require an update of these produced values as well. As previously stated, tracking these changes has the potential to become overly burdensome.

If the LSE/UDC does not have the data element(s) requested, then this subsection would require the LSE/UDC to estimate its value. Prior to computing the estimate, the LSE/UDC is to submit a description of the estimating technique they wish to use for CEC review and approval. Some of the data elements LSE/UDCs are expected to estimate are clearly out-of-scope for SDG&E. For example, hourly charging and discharging of behind-the-meter (BTM) storage, and whether the charging is coming from a customer-side generator or from SDG&E. In addition, as it relates to electric vehicles, an hour by hour accounting of how much of the charge time relates to plug-in EVs and how much is for all-electric EVs.

SDG&E respectfully suggests that subsection 1344(a) either be deleted or replaced with a less formal and rigorous request that the LSE/UDC document the estimation technique and procedures used if it is not commonly used throughout the industry.

Subsections 1344(b) and (c): Annual hourly history data.

SDG&E is not aware of any concerns regarding these subsections other than the due date for both of these reports. The reports are to be submitted by March 15 of the year subsequent to the historical year being reported. That is, for example, SDG&E would submit 2017 historical data by March 15, 2018. This would leave just over two months from year-end 2017 to cull the data and prepare it for submission. At SDG&E, this data is not available for review until the first week in March, which leaves only one week to prepare the submittal. SDG&E respectfully suggests moving this due date back at least one month.

Subsection 1344(g): Hourly load estimates by load modifier and subareas.

This is a new requirement and makes a formal request for each LSE/UDC to provide estimates of behind-the-meter (BTM) customer and equipment characteristics, and hourly charging/discharging estimates. The requirement also requires each LSE/UDC to obtain prior approval of the estimating techniques and procedures that will be used before carrying out the research task. SDG&E believes this goes beyond requesting that a utility share data it may have.

The new requirement orders the utility to carry out research that the CEC would like to have done. SDG&E suggests that this new requirement be reduced to encouraging LSE/UDC to share research findings whenever possible.

Subsections 1344(h) and (i): Load for networked electric vehicle supply equipment and interval metered customer energy consumption.

This section requires a “networked EVSE provider” to submit considerable details for each networked Electric Vehicle Supply Equipment (EVSE) unit. SDG&E will likely be required to report data on networked EVSE associated with employee charging and networked EVSE associated with the Power Your Drive program, because the “networked EVSE provider” is a vendor/contractor hired by SDG&E. Considerable new work and new contractual commitments with vendors will be required to meet the requirements of this section, including reporting data “at least daily” to the CEC. The definition for “Networked EVSE provider” is vague and SDG&E believes it should be modified. The following edits to the Networked EVSE provider should be considered in section 1302(b) definitions on page 8.

(67) “Networked EVSE provider” means any individual, company, or entity who collects charging information directly from an EVSE through an electronic network.

The CEC might also consider the effects on the burgeoning EVSE market, which the proposed data collection requirements may have. SDG&E suggests that the CEC should:

- Define the problem these regulations are intended to solve;
- Leverage existing data collection sources;
- Collaborate with state and federal agencies already collecting similar data;
- Consider a voluntary program which may yield sufficient data for demand forecasting and data analytics; and
- Consider existing data available to Utilities and data not available to Utilities.

SDG&E appreciates your consideration of these comments.

Sincerely,

____/s/ Tim Carmichael

Tim Carmichael
Agency Relations Manager
San Diego Gas & Electric Company