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*Comment Received From: Gregory Anderson*  
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**San Diego Gas and Electric Comments 18-MISC-05**

*Additional submitted attachment is included below.*



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**Subject: CEC Staff's Prompts for Written Comments dated 12/21/2018. Docket Number 18-MISC-05 - Disaggregated Demand Data Cleaning Workshop**

San Diego Gas & Electric Company ("SDG&E") appreciates the opportunity to submit these late filed comments in response to the California Energy Commission's ("CEC") request for comments on the Disaggregated Demand Data Cleaning Workshop.

**Question 1**

a. Are the proposed fields in the Energy Efficiency Participation table appropriate for evaluating meter-level impacts of EE participation on energy demand? If not, what changes do you propose?

**SDG&E Response:**

Installation date may be an additional item to include.

b. IOUs report EE participation data to the California Public Utility Commission's CEDARS database. Staff has proposed that IOUs might provide additional data necessary to link CEDARS data to meter-level energy consumption data under Section 1353, in lieu of reporting participation data directly to the Energy Commission. Is there an efficient way to join these datasets? For example, by IOUs reporting a mapping between CEDARS claim IDs and Section 1353 meter or premise IDs. If so, please describe.

**SDG&E Response:**

CEDARS claim ID is an available option.

c. POUs report EE program-level data under Section 1311, but Section 1353 requires meter-level data. Which data from the POUs are sufficient for CEC staff to estimate EE impacts on demand at the meter level? What is the most efficient and effective way for the Energy Commission to combine POUs' EE data with IOUs' EE data?

**SDG&E Response:**

No Response

**Question 2:**

a. During the workshop, staff suggested that a data flag indicating whether a bill is partial, in addition to the CCA and DA requirements above, would remove all ambiguity. Is this a reasonable solution?

**SDG&E Response:**

Partial bill in this context seems to relate to IOU knowledge of CCA and/or DA commodity charges. The draft methodology proposal seems reasonable: Report which CCA or DA provider a meter is associated with, if any, and include CCA billing charges (if available to the IOU) when reporting billing charges. IOUs many not know if a CCA or DA charge is partial and may not have CCA or DA billing data if the entity chooses to directly bill the customer for commodity services.

b. Please provide any other feedback on this proposal or alternate suggestions for resolving these billing data concerns

**SDG&E Response:**

No Response

**Question 3:**

Please provide any feedback or suggestions on how to structure and collect rate schedules in a way that captures options and modifiers. Ideally, a solution will be appropriate for all utilities. However, staff will consider suggestions that handle rate schedules differently for each utility if necessary

**SDG&E Response:**

No Response

**Question 4:**

An alternate solution is for utilities to report unmetered consumption estimates in a separate table that includes limited geographic fields (e.g. city, state, zip) and allows the utility to report whichever are known.

a. Is this alternate solution the most reasonable approach for reporting unmetered consumption?

**SDG&E Response:**

This alternative solution seems unduly complex. As long as the unmetered consumption estimate records in the BillingConsumptionElec and BillingConsumptionGas tables contain a PremiseID, which can be used as a foreign key on the PremiseElec or PremiseGas table to obtain desired geographic fields.

b. Please provide any additional feedback or suggestions on how to structure and collect unmetered consumption.

**SDG&E Response:**

No Response

**Question 5:**

a. Please propose changes to the proposed source data schema for collecting and tracking submeter relationships.

**SDG&E Response:**

No Response

b. Are there any other potential accounting errors staff should be aware of regarding submeters? If so, are any other changes required to avoid these errors?

**SDG&E Response:**

No Response

**Question 6:**

Please provide any additional feedback or suggestions on the proposed source data schema, including which data fields should be reported and how they should be structured.

**SDG&E Response:**

SDG&E has two suggestions regarding the data fields and schema.

First regarding data fields. SDG&E would like to remind the CEC of the limited scope of the data to be transferred in California Code of Regulations, Title 20, Section 1353. Interested parties have suggested additional data reporting that may fall beyond the scope of Section 1353. Data reporting outside of the scope of Section 1353 and the authority of the CEC should not be include in this docket.

Second regarding the schema for the IntervalConsumptionElec table. The current design is well normalized however, it may not be an efficient data transfer format. The current design requires

seven data elements to describe KwhDelivered and KwhReturned (i.e., MeterId, ServiceAccountID, PremiseID, ServicePointId, IntervalEndTime, IntervalLength, and TimeZone). The concern is these elements must be repeated 24 or 96 times for one day of interval data for one meter. This adds up to considerable data overhead in terms of storage size and transfer time. Solutions may include creating a table with one record per day per meter with fields for each interval, perhaps in separate tables defined by interval length (e.g., an hourly interval table and a 15-minute interval table).

**Question 7:**

Please provide any additional feedback or suggestions on the proposed ETL methods and transformation rules. Please attach a list of specific ETL rules that you recommend.

**SDG&E Response:**

No Response

**Question 8:**

Do you have any other feedback or suggestions which were not addressed in the prompts above?

**SDG&E Response:**

The subjects of data privacy, confidentiality, and security have not been addressed in this Docket. The customer owned data that the IOU and POU custodians will be transferred to the CEC are some of the most sensitive data available on customers and their energy use, including the customers address, billing data, EE participation, PV ownership, and interval data use.

SDG&E has a responsibility to its customers, its shareholders and its regulators to ensure sensitive customer information is reasonably protected by third parties, including the CEC and its partners, and that the data shall only be used for the stated purpose for which it was disclosed. Before any SDG&E customer data is transferred, CEC parties must vet the process that will be used to:

- a) securely transfer the data to the CEC,
- b) securely store the data by the CEC,
- c) Appropriately restrict access to SDG&E customer data internally and externally,
- d) Limit the data usage by the CEC and authorized third parties to stated purposes only for which the data was disclosed,
- e) Limit the amount of data disclosed to CEC and authorized third parties to only the minimum needed to perform the work required,
- f) Monitor for, respond to, and communicate incidents involving SDG&E customer data,
- g) securely transfer the data to authorized third-parties,
- h) Ensure downstream CEC authorized third parties are also vetted for the privacy and security controls described here.

Further, as of January 01, 2020, the California Consumer Privacy Act of 2018 (CCPA) will require California companies, including SDG&E, to enable specific rights for customers in

regards to the access and deletion of their data, which may extend to third parties in some cases. While the specifics of the law are still being analyzed, SDG&E believes it to be important to discuss with the CEC how the CCPA may affect the disclosure and deletion of SDG&E customer data should the customer exercise these rights.

SDG&E is interested in helping the CEC identify and address these privacy, confidentiality, and security issues.

Sincerely,

*/s/ Tim Carmichael*

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