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JOINT APPLICATION IN SUPPORT OF THE CONFIDENTIAL DESIGNATION

1. Southern California Gas Company (SoCalGas) and San Diego Gas & Electric Company (SDG&E) submit this Joint Application for Confidential Designation pursuant to Title 20 Cal. Code. Regs., § 2505 et seq. to keep confidential the following information that is included in their response to the California Energy Commission's (CEC) Data Request Seeking Daily Gas Demand Data dated February 18, 2022: all highlighted fields under the columns titled Core Industrial, Core Natural Gas Vehicle, Core Non-Residential, Noncore Commercial, Noncore Industrial, Noncore Electric Generation, Noncore Enhanced Oil Recovery, Noncore Wholesale and International, Deliveries to SDG&E System, Sum Before Shrinkage and Company Use, and Total.

2. The highlighted information has been marked as confidential and the basis for confidential treatment is because it contains aggregated confidential customer usage information. There is no limit to the amount of time the highlighted information should be kept confidential.

3. The justification for maintaining confidentiality for customer usage is supported by the following: CPRA Exemption, Gov't Code § 6254(k) ("Records, the disclosure of which is exempted or prohibited pursuant to federal or state law"); Cal. Civil Code §§ 1798.80 *et seq.* (process for protecting customer records); Cal. Pub. Util. Code § 8380(d) (a utility "shall use reasonable security procedures and practices to protect a customer's unencrypted electrical or gas consumption data from unauthorized access, destruction, use, modification, or disclosure") and associated CPUC Decisions (D.11-07-056 and D.12-08-045). Findings of Fact 23 and 27, D.12-08-045 ("23. Section 8380 of the Pub. Util. Code makes privacy protections for the usage data generated by AMI a basic consumer protection that both electrical and gas corporations must provide. 27. Since there are no obstacles that would prevent the extension of the privacy rules,

and since such an extension is consistent with the provisions of Section 8380 of the Pub. Util. Code, it is reasonable to extend the privacy rules adopted in D.11-07-056 (and contained in Attachment A herein) to gas corporations.”); and CPRA Exemption, Gov’t Code § 6255(a) (Balancing Test)

4. The highlighted information comprises aggregated customer data related to energy usage and its implications and savings. Public disclosure of this information could compromise privacy to the potential harm of customers. Customer equipment, processes, and operations provide competitive advantages in certain industries and can be considered trade secrets. Allowing information detailing such information could cause financial harm to customers.

5. SoCalGas and SDG&E use the 15/15 Rule established by the CPUC in D.97-10-031 (establishing the 15/15 Rule in the Direct Access context only) as a mechanism to assess whether customer usage data is sufficiently aggregated to protect customer confidentiality. *See also* CPUC D.11-07-056 (the release of data does not disclose or reveal specific customer information because of the size of the group, rate classification, or nature of the information); CPUC D.14-05-016 (establishing aggregation requirements for sharing energy usage information in certain contexts).

6. The 15/15 Rule generally provides that aggregated or anonymized customer-specific information must be made up of at least 15 customers and a single customer’s load must be less than 15% of an assigned category. If the number of customers in the compiled data is below 15, or if a single customer’s load is more than 15% of the total data, categories must be combined, or non-conforming customer information must be removed before the information is released. In this instance, the aggregated customer information in the highlighted fields do not meet the 15/15 Rule.

7. Accordingly, the highlighted information is confidential customer information that is maintained by SoCalGas and SDG&E without access to the public and should be protected from public disclosure.

The undersigned declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of their knowledge on behalf of their respective entity.

Executed this 22nd day of April, 2022, at Los Angeles, California.



Jennifer L. Walker

Vice President – Customer Services for Southern California Gas Company

Executed this 22nd day of April, 2022, at San Diego, California.



Scott B. Crider

Senior Vice President – Customer Services and External Affairs for San Diego Gas & Electric Company