

# **ATTACHMENT C**

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue  
Implementation and Administration of  
California Renewables Portfolio Standard  
Program.

Rulemaking 08-08-009

**THE RESPONSE OF THE PUBLIC ADVOCATES OFFICE TO  
THE JOINT PETITION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E),  
SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E), AND SOUTHERN  
CALIFORNIA EDISON COMPANY (U 338 E) FOR MODIFICATION OF  
D.10-12-048 AND RESOLUTION E-4414 TO PROTECT THE PHYSICAL  
SECURITY AND CYBERSECURITY OF ELECTRIC DISTRIBUTION AND  
TRANSMISSION FACILITIES**

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**TABLE OF CONTENTS**

	<u>Pages</u>
<b>I. INTRODUCTION.....</b>	<b>1</b>
<b>II. SUMMARY OF RECOMMENDATIONS .....</b>	<b>1</b>
<b>III. BACKGROUND .....</b>	<b>2</b>
<b>IV. DISCUSSION .....</b>	<b>4</b>
A. THE DECEMBER 17, 2018 ALJ RULING IN THE DISTRIBUTION RESOURCES PLAN RULEMAKING (R).14-08-013 INVALIDATES THE PFM’S ASSERTION THAT THE COMMISSION’S TREATMENT OF INFORMATION IN THAT PROCEEDING JUSTIFIES REMOVAL OF THE PV RAM MAPS FROM THE PUBLIC DOMAIN. ....	4
B. THE PFM FAILS TO JUSTIFY ITS CLAIM THAT PUBLIC DISCLOSURE OF PV RAM MAPS RESULTS IN AN “UNJUSTIFIABLE AND SERIOUS RISK.” .....	5
1. The PFM provides little specific evidence of potential risk.....	6
2. The PFM fails to compare the incremental risk of maintaining the PV RAM maps in the public domain relative to the existing risk of other sources of information.....	7
3. The PFM fails to justify its assertion that maintaining the PV RAM maps in the public domain increases the risk of cyber attacks.....	9
4. The PFM fails to compare the potential benefits of removing the PV RAM maps from the public domain with the harm their removal would cause to a transparent distribution planning process.....	10
<b>V. CONCLUSION .....</b>	<b>11</b>

## I. INTRODUCTION

Pursuant to Rule 16.4 of the California Public Utilities Commission’s (Commission) *Rules of Practice and Procedure* (Rules), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates) submits this response to the December 10, 2018<sup>1</sup> *Joint Petition of Pacific Gas and Electric Company (U 39 E), San Diego Gas & Electric Company (U 902 E), and Southern California Edison Company (U 338 E) for Modification of D.10-12-048 and Resolution E-4414 to Protect the Physical Security and Cybersecurity of Electric Distribution and Transmission Facilities* (PFM).<sup>2</sup> The PFM requests that access to photovoltaic renewable auction mechanism maps (PV RAM maps), which have been publicly available for nearly seven years,<sup>3</sup> be limited to entities and individuals that (1) demonstrate a “need to know,” (2) have the ability to protect the data using proposed standards approved by the Commission, and (3) execute an appropriate non-disclosure agreement (NDA).<sup>4</sup>

## II. SUMMARY OF RECOMMENDATIONS

The Commission should reject the PFM for the following reasons:

- The December 17, 2018 Administrative Law Judge (ALJ) ruling in the Distribution Resources Plan (DRP) Rulemaking (R.) 14-08-013 invalidates the PFM’s assertion that the Commission’s treatment of information in that proceeding justifies removal of the PV RAM maps from the public domain.;
- The PFM fails to justify its claim that Decision (D.) 10-12-048<sup>5</sup> (the Decision) and Resolution E-4414, which require public disclosure of PV RAM maps, result in an “unjustifiable and serious risk.”<sup>6</sup>

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<sup>1</sup> Pursuant to Rule 16.4(f), this response is timely filed.

<sup>2</sup> The Public Advocates Office Response refers collectively to Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE) and San Diego Gas & Electric Company (SDG&E) as the investor-owned utilities, or IOUs.

<sup>3</sup> The IOUs were required to have the maps on line not later than March 31, 2012. PG&E’s maps were in compliance with the Commission’s requirements by August 18, 2011. Resolution E-4414, p. 20.

<sup>4</sup> PFM, p. 2.

<sup>5</sup> D.10-12-048, *Decision Adopting the Renewable Auction Mechanism*, December 17, 2010 (Decision).

<sup>6</sup> PFM, p. 10.

### III. BACKGROUND

D.10-12-048 established the Renewable Auction Mechanism (RAM) “for the procurement of smaller renewable energy projects that are eligible for the California Renewables Portfolio Standard (RPS).”<sup>7</sup> An important element of the RAM program was the requirement to identify “Preferred Locations” for potential RAM projects, so the Decision required that:

The IOUs must provide the “available capacity” at the substation and circuit level, defined as the total capacity minus the allocated and queued capacity. The IOUs should provide this information in map format.<sup>8</sup>

The Decision also stated that “IOUs and ED [Energy Division] shall make the maximum amount of RAM data public,”<sup>9</sup> and required that the IOUs file an advice letter to “provide the preferred locations map and a description of how the maps were computed.”<sup>10</sup> Resolution E-4414 (Resolution) implemented the RAM program, including the above requirement for maps of Preferred Locations, referred to as “RAM maps.”<sup>11</sup> SCE and SDG&E requested, in comments on the draft Resolution, that the maps “should not be released publicly.”<sup>12</sup> However, the final Resolution rejected these concerns because “these arguments were already disposed of in the Decision [D.10-12-048] and SCE and SDG&E’s arguments are an improper attempt to re-litigate this issue.”<sup>13</sup> The Resolution directed that “the IOUs should provide maps that cover both the distribution and transmission systems by March 31, 2012” subject only to a user registration process.<sup>14</sup>

The Commission initiated Rulemaking R.14-08-013 to establish the policies, procedures, and rules for the development of the Distribution Resources Plan (DRP) in accordance with Assembly Bill (AB) 327, which created Public Utilities Code Section 769. Similar to the RAM’s

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<sup>7</sup> D.10-12-048, p. 2.

<sup>8</sup> D.10-12-048, Appendix A, p.5. The Decision does not refer to “RAM” maps or “PV RAM” maps. This response uses the term “RAM map” and “PV RAM map” interchangeably to refer to the maps required and implemented by D.10-12-048.

<sup>9</sup> Ibid, p.7.

<sup>10</sup> Ibid, p. 8.

<sup>11</sup> Resolution E-4414, pp. 18-22. The Resolution refers to SCE’s existing solar PV program (SPVP) map at page 18, but not “PV RAM” maps as a term regarding the required maps of preferred locations.

<sup>12</sup> Resolution E-4414, p. 21.

<sup>13</sup> Ibid.

<sup>14</sup> Ibid, pp. 21-22.

objective of promoting smaller renewable generators,<sup>15</sup> an objective of the DRP proceeding is to increase the use of distributed energy resources (DER).<sup>16</sup> As part of R.14-08-013, the Commission issued D.17-09-026, *Track 1 Demonstration Projects A (Integration Capacity Analysis [ICA]) and B (Locational Net Benefits Analysis [LNBA])* on September 28, 2017. D.17-09-026 adopted the methodology that the IOUs must use to calculate the capacity for DER on distribution circuits, the Integration Capacity Analysis (ICA), and present the values as part of online maps.<sup>17</sup> The resulting ICA maps are a refinement of RAM maps, but both the ICA and RAM maps provide the locations of substations and distribution circuits, as well as information on the capacity to integrate DERs into the grid without impairing safety and reliability.<sup>18</sup> Ordering Paragraph (OP) 5 of D.17-09-026 ordered the IOUs to include identified system attributes in the online ICA maps, while OP 6 ordered the IOUs to implement the ICA, including providing the online map statewide by July 6, 2018.<sup>19</sup>

On June 14, 2018, PG&E and SDG&E submitted a letter to the Commission's Executive Director seeking a suspension of the July 6, 2018 ICA implementation deadline pending an ALJ ruling on confidentiality in a related phase of the DRP proceeding.<sup>20</sup> The IOUs' requested suspension of the ICA implementation deadline resulted in a series of ALJ rulings, a hearing,

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<sup>15</sup> D.10-12-048, p. 2.

<sup>16</sup> Order Instituting Rulemaking (R). 14-08-013 issued August 20, 2014, pp. 2-3. Public Utilities Code 769(a) defines DERs as distributed renewable generation resources, energy efficiency, energy storage, electric vehicles, and demand response technologies.

<sup>17</sup> D.17-09-026 at page 3 adopted an ICA methodology for two of three identified use cases: online maps and interconnection use cases. A methodology for the "distribution planning" use case has not yet been adopted.

<sup>18</sup> D.10-12-048 required the "available capacity" be provided in the RAM maps, defined as "as the total capacity minus the allocated and queued capacity" and required that the IOUs provide a "description of how the maps were computed." See Appendix A, pp. 5-8. Resolution E-4414 found that SCE had not provided the required available capacity data and required that all IOUs provide maps of available capacity that "cover each IOU's service territory, including both the distribution and transmission systems." See pp. 21-22. DRP ICA maps utilize a common "iterative" methodology for calculating the capacity for DERs for the purpose of interconnection, and to be utilized in initial deployment of online ICA maps. This methodology evaluates thermal, voltage, safety, protection criteria, whereas the capacity evaluated in RAM maps is based only on thermal criteria. See D.17-09-026, OP 5 for the ICA requirements, including evaluation criteria. While the RAM and ICA maps are very similar, the RAM maps are required to include transmission assets while the ICA maps do not.

<sup>19</sup> OP 6 of D.17-09-026 required the IOUs to provide the online maps statewide within nine months of that decision's October 6, 2017 issuance.

<sup>20</sup> The letters requesting suspension of the July 6, 2018 ICA implementation deadline are attached at Appendix A.

protests, motions, and meetings between DRP parties regarding the confidentiality of electric distribution information. This process ultimately resulted in an extension of the ICA map implementation date to December 28, 2018.<sup>21</sup> As part of this process, the Public Advocates Office and other parties described existing sources of public data on electric distribution equipment, including RAM maps.<sup>22</sup>

The IOUs filed the PFM on December 10, 2018, one week before the issuance of an ALJ Ruling in the DRP proceeding (December 17th Ruling). The December 17th Ruling resolves the IOUs' confidentiality claims regarding ICA maps and other distribution planning as follows:

1. The IOUs failed to meet their burden of proof to redact electric distribution information based on purported security concerns;
2. Information contained in the maps ordered by D.17-09-026 and D.18-02-004 should be made public by December 28, 2018, and should not be subject to an NDA;
3. Access to online portals containing electric distribution data, including ICA maps, should be subject to the registration process adopted by Resolution E-4414.<sup>23</sup>

#### IV. DISCUSSION

##### **A. The December 17, 2018 ALJ ruling in the Distribution Resources Plan rulemaking (R).14-08-013 invalidates the PFM's assertion that the Commission's treatment of information in that proceeding justifies removal of the PV RAM maps from the public domain.**

The PFM incorrectly relies on the data reduction criteria and process "adopted by the ALJ in the DRP proceeding"<sup>24</sup> to justify the request to use a "two-step process" to limit access to

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<sup>21</sup> See *Administrative Law Judge's Ruling Addressing Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company's Claims for Confidential Treatment and Redaction of Distribution System Planning Data Ordered by Decisions 17-09-026 and 18-02-004*, issued July 24, 2018 in R. 14-08-013, pp. 3-8, and *Administrative Law Judge's Ruling Resolving Confidentiality Claims Raised by Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company as to Distribution System Planning Data Ordered by Decision (D.) 17-09-026 and D.18-12-004*, issued December 17, 2018 in R.14-08-013, pp. 2-8.

<sup>22</sup> See Appendix C *Public Advocates Office Notice of Ex Parte Communication of the Public Advocates Office*, filed October 23, 2018 in R.14-10-003. See also, *Interstate Renewable Energy Council, Inc., Stem, JTN Energy, Sunrun, Borrego Solar, Coalition for Community Solar Access, Calcom Energy, Clean Coalition, and Solar Energy Industries Association Joint Late Notice of Ex Parte Communication*, filed October 23, 2018 in R.14-10-003.

<sup>23</sup> December 17th Ruling, p.13, and OP 3, p. 15.

RAM maps that have been public since their implementation as directed by the Decision.<sup>25</sup> In fact, the resolution of data issues in the DRP proceeding rebuts the PFM’s request to redact and/or limit access to currently public PV RAM maps. The December 17th Ruling does not propose a “two-step process,” but explicitly states that information contained in the maps ordered by D.17-09-026 and D.18-02-004 “should be made public.”<sup>26</sup> The December 17th Ruling also requires that ICA maps and other related data must be online via IOU DRP portals “by December 28, 2018” subject only to a registration process.<sup>27</sup> Thus, the PFM’s claim that redacting PV RAM maps is “consistent with the data redaction criteria approved for the DRP maps” is false. Instead, the logical conclusion is that since ICA maps, which contain similar information to RAM maps, will be made public, then the currently public PV RAM maps should remain public.

Independent of this fundamental rebuttal of the basis of the relief requested in the PFM, the December 17th Ruling further erodes the IOUs’ assertion that public PV RAM maps result in “public release of the PV RAM maps presents an “unjustifiable and serious risk,”<sup>28</sup> as discussed in section IV B below.

**B. The PFM fails to justify its claim that public disclosure of PV RAM maps results in an “unjustifiable and serious risk.”**

The PFM does not provide evidence to support its assertion that the currently public PV RAM maps pose a risk. Furthermore, the Commission requires that risks be quantified and ranked for subsequent action.<sup>29</sup> With respect to the PFM, the potential risks that the IOUs attribute to continued publication of the PV RAM maps must be compared to the residual

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<sup>24</sup> PFM, p. 12.

<sup>25</sup> PFM, pp. 12-14. In this response, the term “RAM map” and “PV RAM map” are used interchangeably to refer to the maps implemented per D.10-12-048, as mentioned in footnote 8 above.

<sup>26</sup> December 17th Ruling, p.13, emphasis added.

<sup>27</sup> December 17th Ruling, Ruling Paragraph 3, p. 15.

<sup>28</sup> PFM, p. 10.

<sup>29</sup> R.13-11-006 was opened to “Develop a Risk-Based Decision-Making Framework to Evaluate Safety and Reliability Improvements and Revise the General Rate Case [GRC] Plan for Energy Utilities.” This quote is the adopted description of the rulemaking. D. 14-12-025 required the large IOUs to file a Risk Assessment Mitigation Phase (RAMP) report to include “the utility’s prioritization of the risks it believes it is facing and a description of the methodology used to determine such risks.” See page 32. These reports are filed by November 30 the year prior to the GRC filing date. See OP 1, p. 55 and p. 41, Table 3.



potential risks if the PV RAM maps are redacted, and the probable risks if the DRP transparency goals are not realized. The PFM fails to include the required analysis.

**1. The PFM provides little specific evidence of potential risk.**

First, the IOUs support their assertion that public PV RAM maps result is an unjustified and serious risk with broad and unsupported assertions in the body of the PFM; the Declaration of Bernard A. Cowens Vice President and Chief Security Officer of PG&E (PG&E Declaration); and assertions in the Declaration of William C. Sauntry on behalf of SDG&E in Support of Joint Petition for Modification (SDG&E's declaration) to nationwide physical security issues, with only a single issue in California.<sup>30</sup> On the whole, the evidence cited in the PFM is comparable to the evidence that the IOUs presented in the DRP, which led the ALJ to conclude that “the IOUs have failed to meet their burden of proof.”<sup>31</sup>

SDG&E's declaration presents an extensive discussion of potential threats to California's electric infrastructure including references, which provides an opportunity to evaluate the merit of the claimed harm. The first nine issues included in SDG&E declaration are similar to assertions in the body of the PFM and those provided in PG&E's declaration: self-evident and unsupported assertions of what could happen, and references to generalized articles such as “if you see something, say something.”<sup>32</sup> Item 10 provides illustrations of outages due to “actual or suspected physical attacks, sabotage, and vandalism” nationwide and within the Western Electricity Coordinating Council (WECC), but does not includes statistics for SDG&E, PG&E, or SCE, or a reference that would allow review of these incidents such that the outages can be compared to other sources of outages. For example, SDG&E's 2017 annual report on system reliability lists the top 10 major unplanned outage events, and number one was “animal contact” at a substation, most are related to bad weather, and none are attributed to malicious third-party action.<sup>33</sup> Items 11 and 12 in SDG&E's declaration provide examples of a number of incidents of “malicious intent against the electric system” but the only one from California was the Metcalf

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<sup>30</sup> Section 3 of the PFM includes only one citation, and that is to a pending proposed decision in R.15-06-009. PG&E's declaration also includes one citation, and that is regarding cyber security.

<sup>31</sup> December 17th Ruling, p. 11.

<sup>32</sup> PFM, SDG&E Declaration, p. 3.

<sup>33</sup> SDG&E Electric System Reliability Annual Report 2017, dated July 16, 2018, p.56. Available at: [http://www.cpuc.ca.gov/2017\\_aers/](http://www.cpuc.ca.gov/2017_aers/).

attack of 2013. The declaration fails to mention that the Physical Security Rulemaking | (R.15-06-009)<sup>34</sup> was opened as a direct response to this attack.<sup>35</sup>

The PFM makes multiple assertions about what “could” happen if bad actors had free access to PV RAM maps, even though these maps have been public since 2012. Given the extended time period in which RAM maps have been publicly available, the IOUs could have presented evidence, if it existed, that the maps have been exploited by bad actors. SCE and SDG&E made no such assertions and have no such evidence.<sup>36</sup> PG&E implied that it had “evidence of suspicious and unknown actors accessing the maps” and that this “indicates a level of risk that needs to be mitigated.”<sup>37</sup> To date, the IOUs have not provided evidence of any new threats that would lead terrorist or vandals to act on RAM map data. Even with the benefit of the information provided by SDG&E, the PFM does not allow quantification of the purported risk posed by the RAM maps in California.<sup>38</sup>

**2. The PFM fails to compare the incremental risk of maintaining the PV RAM maps in the public domain relative to the existing risk of other sources of information.**

The relevant risk for the Commissions’ consideration is the incremental risk posed by RAM maps relative to the level of risk attributed to all other sources. As discussed in Section III A of this response, if ICA maps and other distribution data are public per the December 17th Ruling, any incremental risk posed by the PV RAM maps will be de minimis, since the publicly available DRP information provides more information than is available in RAM maps.

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<sup>34</sup> Order Instituting Rulemaking (R.) 15-06-009 filed June 11, 2015. See pp. 2-3. The issues regarding the distribution physical security proceeding are already under consideration in a proposed decision in that proceeding, which is on the Commission’s January 10, 2019 agenda, so this response to the PFM does not address them.

<sup>35</sup> The Metcalf attack was a significant incident that warrants the Commission’s consideration of risk in R. 15-06-009, but fortunately, no customers lost power due to the attack. R 15-06-009, filed June 11, 2015, Appendix B, p. iii. <sup>36</sup> See December 21, 2018 responses of SCE and SDG&E to the Public Advocates Office Data Requests, attached at Appendix B. As of the date of this PFM response, PG&E had not yet submitted its responses to the Public Advocates Office data request, which was issued December 17, 2018.

<sup>36</sup> See December 21, 2018 responses of SCE and SDG&E to the Public Advocates Office Data Requests, attached at Appendix B. As of the date of this PFM response, PG&E had not yet submitted its responses to the Public Advocates Office data request, which was issued December 17, 2018.

<sup>37</sup> PFM, p. 10. This language is identical to language from page 2 of a declaration of PG&E Vice President Bernard A. Cowens, attached to the PFM.

<sup>38</sup> In fact, the PFM states that “increased risk or scale of potential disruption due to public and unauthorized access to the PV RAM maps is not quantifiable.” PFM, p. 10.

Further, even without the December 17th Ruling, which was issued after the PFM was filed, the incremental risk posed by PV RAM maps is small when compared to other public data. For example, transmission lines and substations are public as static and interactive Geographic Information Systems (GIS) maps via the California Energy Commission (CEC) website, as noted in Appendix C to this response.<sup>39</sup> While these CEC maps do not show the location of distribution circuits, their existence undermines the IOU claim that “it is difficult if not infeasible to piece together from these sources a digital connectivity map in one full map.”<sup>40</sup> Given that attacks to transmission level assets would impact more customers, and that the Metcalf attack was on a transmission substation, the Commission should carefully scrutinize any request to restrict access to distribution data more than access to transmission data.

The PFM also claims that “PV RAM data sets provide the locations of underground electric infrastructure which are not visible on non-utility public maps.”<sup>41</sup> However, some of the equipment that comprises underground distribution circuits is above ground, and thus the PFM statement is not completely accurate. The Public Advocates Office showed that padmount service transformers, which transform primary to secondary voltage for customers on some underground distribution circuits,<sup>42</sup> are above ground, occur at regular intervals, and indicate the route of the underground circuit.<sup>43</sup> As a result, the incremental information provided by the RAM maps compared to CEC and Google maps is relatively small, even if the DRP data, such as ICA maps, were not required to be public.<sup>44</sup>

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<sup>39</sup> Other citations to CEC maps are provided in the December 17th Ruling, p. 13.

<sup>40</sup> PFM, p. 11.

<sup>41</sup> Ibid.

<sup>42</sup> Some underground distribution circuits place service transformers in underground vaults, and while these are less visible than padmount transformers, the vaults have access panels or doors that are visible.

<sup>43</sup> See *Public Advocates Office Notice of Ex Parte Communication of the Public Advocates Office*, filed October 23, 2018 in R.14-10-033, attached at Appendix C. The padmount illustration is at page 7 of 10 of the attachments to the one-page summary of the ex parte meeting.

<sup>44</sup> Given the public availability of information related to the electric distribution infrastructure, the PV RAM maps fail to meet the preliminary requirement that “critical infrastructure information means information not customarily in the public domain ....” 6 USC Section 671(3).

**3. The PFM fails to justify its assertion that maintaining the PV RAM maps in the public domain increases the risk of cyber attacks.**

The PFM claims that the “IOUs’ PV RAM maps, can be used by a “bad actor” to commit a physical *or cyber attack* on utility facilities.”<sup>45</sup> As with the claimed risk to physical security, the PFM provides no evidence linking the PV RAM maps to cyber attacks. Physical security and cyber security are distinct risks that should be discussed separately in the PFM, but they are not.<sup>46</sup> And while the PFM includes arguments and declarations intended to support redaction of the RAM maps because of physical threats, it provides no such support specific to potential cyber security risks. This is an important distinction because the potential linkage between information in the RAM maps and cyber security is much less clear than the potential linkage to physical security. In theory, it is possible that some information available in the PV RAM maps, such as substation or circuit names or identification numbers, could be used to target specifically identified devices if those identifiers are used in SCADA or other communication and control systems.<sup>47</sup> However, the PFM includes no evidence of this to help the Commission determine the scope and impact of this hypothetical issue. Even if evidence were provided that showed a significant risk, redaction of identification information is only one alternative for mitigation. Other alternatives include revising the equipment identifiers within existing communication and control systems, so that they do not match the common names of facilities or equipment, or to upgrade existing systems to meet higher cyber security standards as SCE requested in its most recent general rate case (GRC).<sup>48</sup>

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<sup>45</sup> PFM, p.10, emphasis added.

<sup>46</sup> For example, in SDG&E’s Test Year 2019 General Rate Case Application (A.) 17-10-007/008, Cyber Security is one identified risk (Risk SDG&E-07) out of 16 total identified risks, including risks to “Electric Infrastructure Integrity,” Risk SDG&E-12. See the Direct Testimony of Diana Day, Risk Management Policy, Exhibit SCG-02/SDG&E-02, p. DD-A. 1-4.

<sup>47</sup> Supervisory Control and Data Acquisition (SCADA) is a general name for communication systems that allow grid operators in control rooms to remotely monitor and operate field equipment, including substation equipment.

<sup>48</sup> SCE’s test year (TY) 2018 GRC, Application (A). 16-09-001 included a request for a “Substation Automation (SA-3) and Common Substation Platform (CSP)” to “enable modern cybersecurity.” See Exhibit SCE-2, Volume 10, p. 58. SCE also requested a new “Field Area Network (FAN)” based in part on the following: “while we have been able to integrate cybersecurity tools and controls into our existing NetComm system to-date, we anticipate that our current system will not suffice as these cybersecurity threats evolve.” Ibid, p. 71. Cybersecurity is also mentioned in SCE’s request for the Wide Area Network (WAN) used to communicate between substations and control centers. Ibid, pp. 80 and 83.

**4. The PFM fails to compare the potential benefits of removing the PV RAM maps from the public domain with the harm their removal would cause to a transparent distribution planning process.**

Risk analysis involves comparing the risks posed by an action to the expected benefits of that action. The PFM claims that redacting the RAM maps could provide an increase in security and safety but fails to mention that restricting access to the RAM maps will have a cost: a reduction of visibility into the distribution system compared to that currently available. Section 769 of the Public Utilities Code required the IOUs to file distribution resource plans by July 1, 2015 to propose methods of integrating cost-effective DERs and led to the opening of R.14-08-013, the DRP proceeding. Within the DRP proceeding, an ICA methodology was developed and statewide deployment of online ICA maps was authorized to “facilitate a streamlined and transparent interconnection process.”<sup>49</sup> The Commission also required IOUs to file a new grid needs assessment (GNA) report to “provide transparency into the assumptions and results of the distribution planning process.”<sup>50</sup> The IOUs’ attempts to limit public access to ICA maps and other data in the DRP proceeding are inconsistent with the DRP goals since it would limit transparency. This loss of transparency and/or the additional burden of complying with complicated non-disclosure agreements (NDAs)<sup>51</sup> could result in failure to meet DRP goals if the PFM’s requested additional roadblocks prevent DER developers from participating in annual DER solicitations as part of the Distribution Investment Deferral Framework (DIDF).<sup>52</sup> Restricting access to the RAM maps would also be inconsistent with the DRP goal of increasing transparency.<sup>53</sup>

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<sup>49</sup> D.17-09-026, p. 27.

<sup>50</sup> D.18-02-004, p. 33.

<sup>51</sup> The November 9, 2018 ALJ ruling in the DRP proceeding at pages 3-4 ordered parties to meet and attempt to resolve issues related to DRP data confidentiality, including development of an NDA. The December 17th Ruling at page 8 summarized the outcome of those meetings, including that “they [DRP parties] are no closer to resolving their dispute as to ... suitable terms of an NDA that would allow stakeholders access to the redacted CEII.”

<sup>52</sup> The DIDF process is discussed in Section 3 of D.18-02-004. Consistent with OP 2.w, the IOUs submitted advice letters with recommendations for the first DIDF solicitation on November 28, 2018.

<sup>53</sup> The PFM does not state whether the IOUs expect to use the PV RAM program for additional procurement. In any case, DER developers have reported in the DRP proceeding that they are using the PV RAM maps in the absence of ICA maps. While the ICA maps were posted December 28, 2018 and should eventually replace the PV RAM maps, it would be premature to remove the PV RAM maps until the completeness and accuracy of the ICA maps has been demonstrated.

**V. CONCLUSION**

The Public Advocates Office recommends that the Commission deny the PFM. Approval of the relief requested in the PFM would reduce transparency by limiting access to data that has been public for years. While this matter is largely intertwined with the DRP proceeding and resolved via the December 17th Ruling, rejection of this PFM will further emphasize the importance of increased transparency and will set a high bar against which to evaluate any subsequent efforts to stymie this objective.

Respectfully submitted,

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