



BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED

10/30/18
03:37 PM

Application of Pacific Gas and Electric
Company for Authority, Among Other Things,
to Increase Rates and Charges for Electric and
Gas Service Effective on January 1, 2017.
(U39M)

Application 15-09-001

**LATE FILED NOTICE OF EX PARTE COMMUNICATION
OF THE PUBLIC ADVOCATES OFFICE**

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (Commission), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), formerly the Office of Ratepayer Advocates,¹ submits the following late notice of ex parte communication in the above-captioned proceeding. The Public Advocates Office did not timely file this notice because we mistakenly believed that this proceeding is closed.

On October 19, 2018, at 1:00 PM, Public Advocates Office representatives Tom Roberts, Senior Utilities Engineer, Tim Drew, Public Utilities Regulatory Analyst, and Matt Miley, Staff Attorney, met in-person with Forest Kaser, Advisor to President Picker. David Peck, Advisor to President Picker, also joined the meeting. The meeting lasted approximately 50 minutes. The meeting took place at the Commission's office located at 505 Van Ness Avenue, San Francisco, California. The communication was oral and was initiated by the Public Advocates Office. The Public Advocates Office distributed written material during the communication, a copy of which is attached to this ex parte notice.

¹ The Office of Ratepayer Advocates was renamed the Public Advocates Office of the Public Utilities Commission pursuant to Senate Bill No. 854, which was signed by the Governor on June 27, 2018 (Chapter 51, Statutes of 2018).

During the meeting, the Public Advocates Office discussed the potential implications to this proceeding if the Commission grants pending utility requests in the Distributed Resources Plan (DRP) proceeding (Rulemaking 14-08-013 et al., and Application 15-07-005 et al.) to designate certain distribution infrastructure information as confidential. The Public Advocates Office noted that (1) electric infrastructure location and other information is currently public data, (2) redaction of locational data, equipment information, and upgrade costs would create administrative burdens (e.g., filings under seal and closed hearings) for parties and the Commission in other proceedings, including general rate cases, and (3) the Commission's decisions in the DRP proceeding promoted greater transparency, not less.

The Public Advocates Office recommended that the Commission not grant the utilities' request to redact electric distribution asset data in the absence of sufficient clarification and justification. In addition, the Public Advocates Office stated that the Commission should weigh the purported benefits of redaction against the risk that the DRP goals, including transparency, will not be realized, and the administrative burden redaction imposes on other proceedings, such as this general rate case (Application 15-09-001).

Respectfully submitted,

/s/ MATT MILEY
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October 30, 2018

ATTACHMENT



Redaction of Distribution Resources Plan (DRP) Data

Public Advocates Office Position: IOUs should demonstrate that the purported benefits of redacting DRP data outweigh the risk of undermining the goals the DRP Proceeding, and the administrative burden imposed by adding confidential information to General Rate Case (GRC) proceedings.

Background

- Investor Owned Utilities (IOUs) filed motions with redaction criteria on June 15, 2018
- Administrative Law Judge Ruling on July 24, 2018 provided revised redaction criteria
- Hearing to address redaction was held on September 26, 2018
- Integration Capacity Analysis (ICA) map implementation currently due December 31, 2018
- PG&E to file Test Year 2020 GRC with first Grid Modernization Plan December 10-20, 2018

1. Electric Infrastructure Locations Are Currently Public Data

- Renewable Auction Mechanism (RAM) Maps
- California Energy Commission (CEC) Mapping Data
- Google Maps

2. Redaction Has Costs Beyond the DRP Proceeding

- GRCs are one of the most complicated proceedings before the California Public Utilities Commission (CPUC) annually
- Equipment information and upgrade costs are currently public in GRCs
- Confidential filings under seal and closed hearings are additional administrative burden to CPUC and parties

3. DRP Should Result in Greater Transparency, Not Less

- Transparency is a goal of DRP: see 2014 DRP Order Instituting Rulemaking (OIR) decision, Decision (D.)17-02-007, D.17-09-026, D.18-02-004, and D.18-03-024
- IOUs seek to redact information that is currently public
- IOU redaction criteria are changing and inconsistent

Public Advocates Office Recommendations

- The CPUC should not grant the IOU request to redact electric distribution asset data in the absence of sufficient clarification and justification
- Before ruling on the IOU redaction request, the CPUC should weigh purported benefits of redaction against the risk that DRP goals will not be realized, and the administrative burden redaction imposes on other proceedings

Attachments to Public Advocates Office

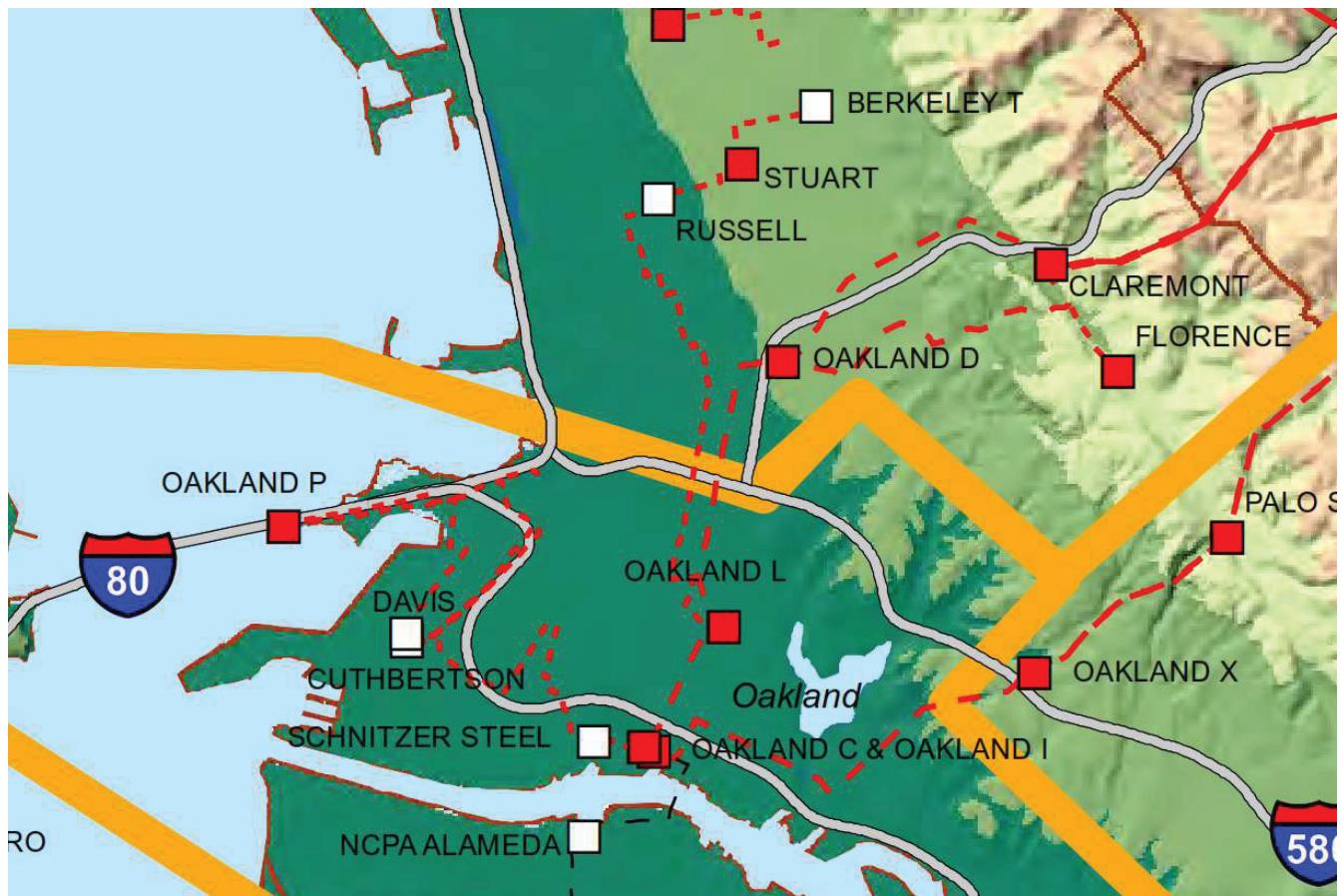
October 19, 2018 Ex Parte Handout

- 1) CEC Mapping Data, Figures 1-6
- 2) Google Map Images of Electric Distribution Equipment, Figures 7-11
- 3) Pepco Hosting Capacity Maps, Including Washington D.C., Figures 12-13
- 4) Public Advocates Office's Chart of Electric Distribution Asset Data Confidentiality, Figure 14
- 5) Image from SDG&E TY 2019 GRC, A.17-10-007/008, Figure 15
- 6) Image from CEC corresponding to Figure 15, Figure 16

All Materials in These Attachments Are Public

Significant locational and capacity data about California energy infrastructure is publically available through the CEC (<https://www.energy.ca.gov/maps/>). This information coupled with Google maps provides detailed information for electric transmission and distribution assets.

Figure 1 - Local Reliability Area (LRA) map (updated July 2015):



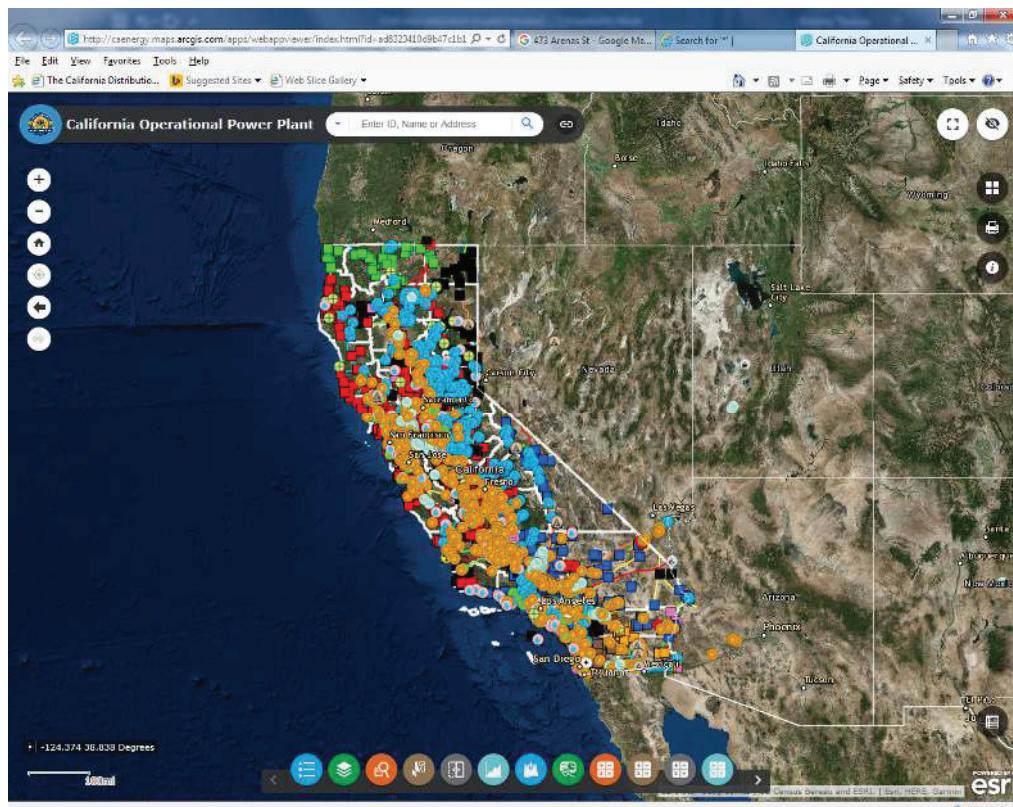
(https://www.energy.ca.gov/maps/reliability/LRA_Enlargement_Area.html)

Figure 2 – Screen shot of Excel file of 3,200 substations (updated March 14, 2017)

Substation	Substation Name	Status	Own	KV_12_TO	Highest_KV	Postal City	County	Zip Co	Sta
SS2777	12Th St.	Operational	Other		33kV to 92kV	Modesto	Stanislaus	95354	CA
SS1345	14Th & 52Nd	Operational	SMUD		33kV to 92kV	Sacramento	Sacramento	95820	CA
SS1346	24Th & Gardendale	Operational	SMUD		33kV to 92kV	Sacramento	Sacramento	95822	CA
SS1347	34Th & E	Operational	SMUD		33kV to 92kV	North Highlands	Sacramento	95660	CA
SS1348	43Rd & S. Land	Operational	SMUD		33kV to 92kV	Sacramento	Sacramento	95822	CA
SS2744	48Th-Martin Luther King	Operational	SMUD		110kV to 161kV	Sacramento	Sacramento	95823	CA
SS1350	88Th-Fruitridge	Operational	SMUD		33kV to 92kV	Sacramento	Sacramento	95828	CA
SS2778	8Th St.	Operational	Other		33kV to 92kV	Modesto	Stanislaus	95354	CA
SS2636	A W Hoch	Operational	IID		33kV to 92kV	Calipatria	Imperial	92233	CA
SS0055	A.P.T. Oro	Operational	PG&E		33kV to 92kV	Oroville	Butte	95965	CA
SS3609	Acacia	Operational	Other		33kV to 92kV	Glendale	Los Angeles	91201	CA
SS3067	Acton	Operational	SCE		110kV to 161kV	Acton	Los Angeles	93510	CA
SS2327	Adelanto	Operational	LADWP		345kV to 500kV	Adelanto	San Bernardino	92301	CA
SS1055	Adin	Operational	Other		33kV to 92kV	Lookout	Modoc	96054	CA
SS3607	Adobe	Operational	PG&E		110kV to 161kV	Bakersfield	Kern	93307	CA
SS1896	Advanced Micro Devices	Operational	Other		110kV to 161kV	Sunnyvale	Santa Clara	94085	CA
SS2770	Aec 2	Operational	Other		110kV to 161kV	Tracy	San Joaquin	95377	CA
SS1756	Aec 300	Operational	Other		110kV to 161kV	Tracy	San Joaquin	95377	CA
SS0696	Aerojet	Operational	SCE		33kV to 92kV	Azusa	Los Angeles	91702	CA
SS3592	Afg	Operational	SCE	YES	110kV to 161kV	Victorville	San Bernardino	92395	CA
SS2013	Ager	Operational	PCORP		110kV to 161kV	Hornbrook	Siskiyou	96044	CA
SS3553	Agnew	Operational	Other		33kV to 92kV	Santa Clara	Santa Clara	95054	CA
SS0216	Agrico	Operational	Other		33kV to 92kV	Kerman	Fresno	93630	CA
SS2922	AgriLink Foods	Operational	Other		33kV to 92kV	Watsonville	Santa Cruz	95076	CA
SS2834	Aqua Mansa	Operational	SCE		33kV to 92kV	Colton	San Bernardino	92324	CA
SS2708	Aidlin Geothermal	Operational	PG&E		110kV to 161kV	Cloverdale	Sonoma	95425	CA
SS3416	Air Liquide	Operational	Other		110kV to 161kV	Union City	Alameda	94587	CA

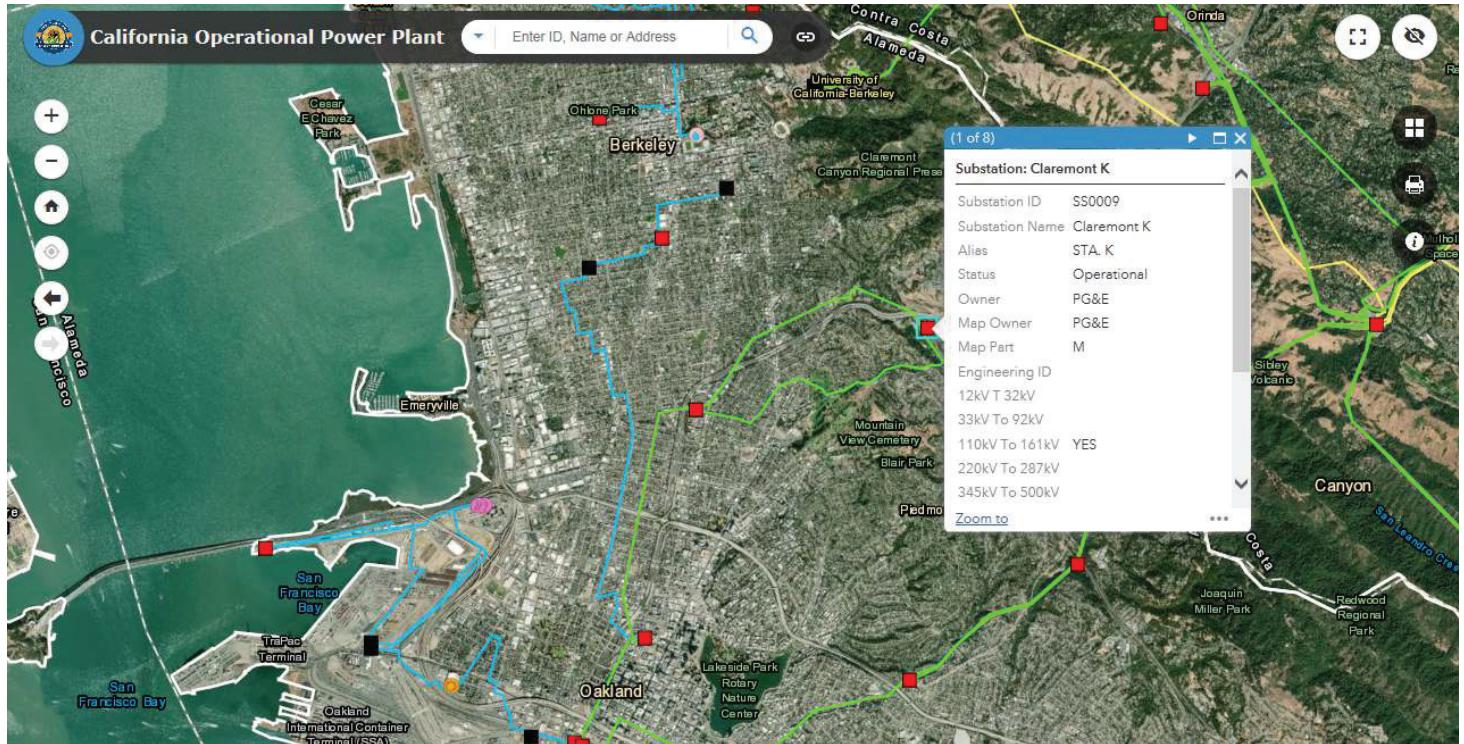
("Statewide Operational Substations" link at <https://www.energy.ca.gov/maps/>, excerpt)

Figure 3 - Interactive GIS Power Plant map (updated 5/17/2018)



<https://cecgis-caenergy.opendata.arcgis.com/datasets/california-operational-power-plant-base-map?fullScreen=true>

Figure 4 - Interactive GIS Power Plant map (updated 5/17/2018); zoomed into Oakland; pop-up for selected substation (Claremont, Claremont K, and Oakland K are used by PG&E for this substation)



<https://cecgis-caenergy.opendata.arcgis.com/datasets/california-operational-power-plant-base-map?fullScreen=true>

Figure 5 - Interactive GIS Power Plant map (updated 5/17/2018); zoomed into Claremont K Substation (Claremont, Claremont K, and Oakland K are used by PG&E for this substation)



<https://cecgis-caenergy.opendata.arcgis.com/datasets/california-operational-power-plant-base-map?fullScreen=true>

Figure 6 - Interactive GIS Power Plant map (updated 5/17/2018); zoomed into Claremont K substation



<https://cecgis-caenergy.opendata.arcgis.com/datasets/california-operational-power-plant-base-map?fullScreen=true>

Figure 7 - Google Map Street view of Claremont K substation, access road, and transmission lines



Figure 8 - Google Map Street view of Claremont K (aka Oakland K) substation with Placard

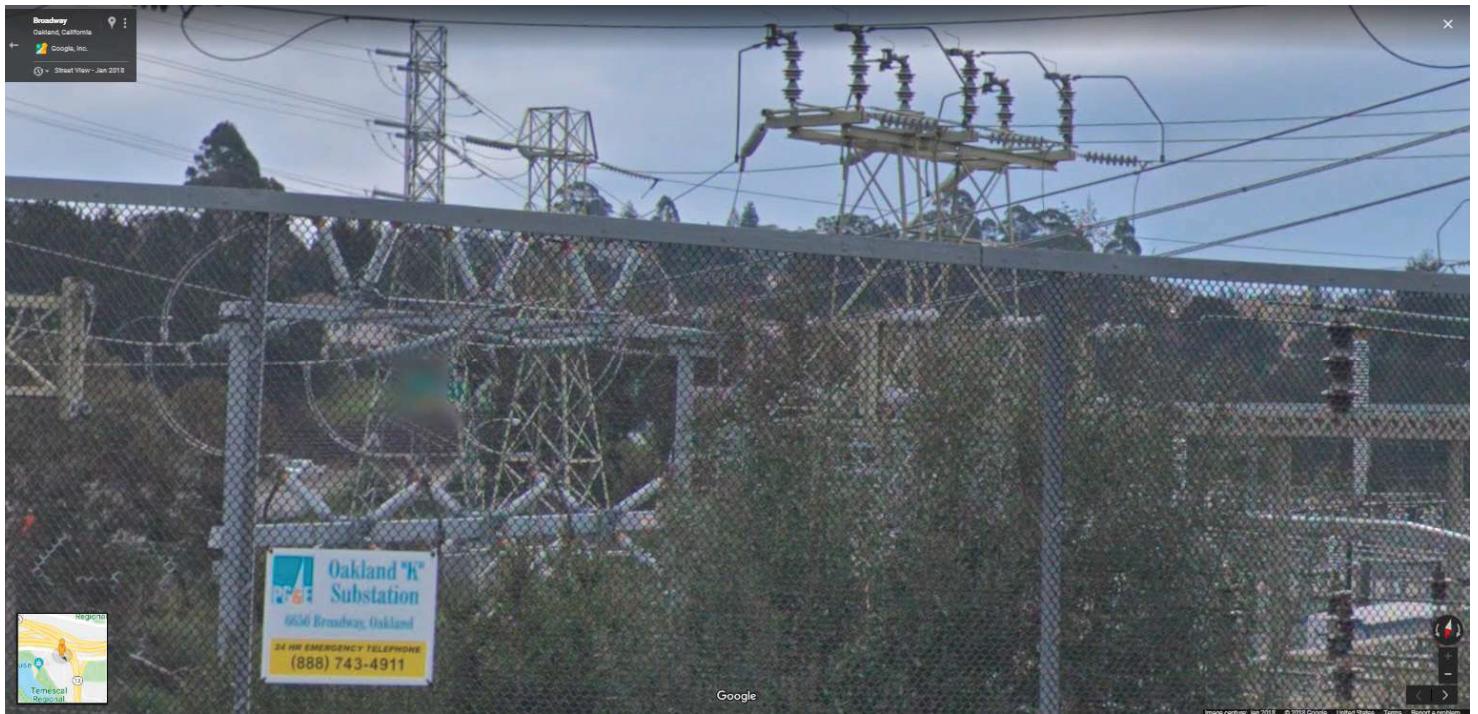


Figure 9 - Google Map Street view of Overhead Distribution Line and Service Transformer, La Jolla



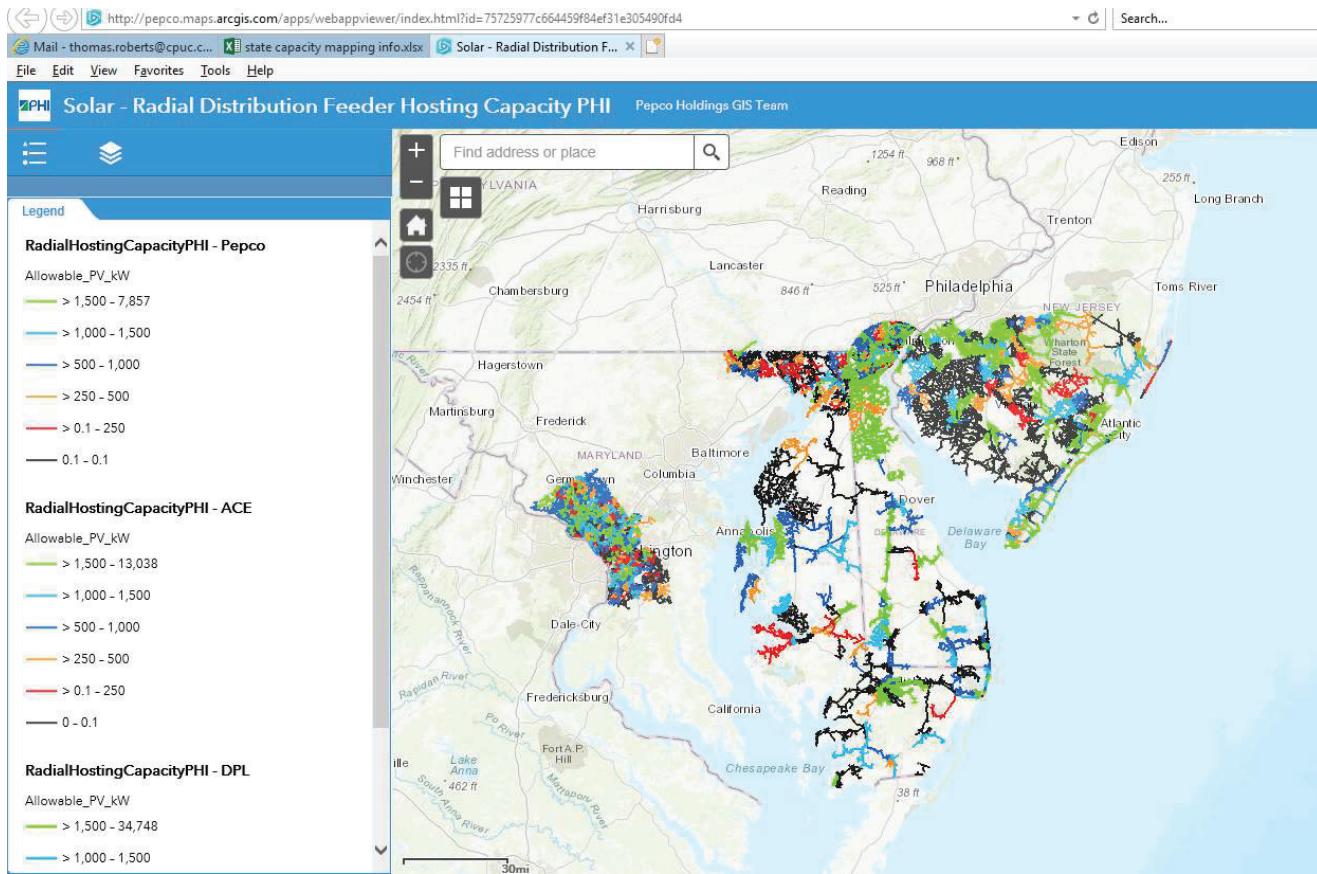
Figure 10 - Google Map Street view of Pad Mount Service Transformer serving Underground distribution circuit, Line, 7220 La Jolla Blvd.



Figure 11 - Google Map Street view of Pad Mount Service Transformer serving Underground distribution circuit, Line, 7310 La Jolla Blvd.



Figure 12 – Pepco Hosting Capacity Map for Delaware, Maryland, and Washington D.C.



<http://pepco.maps.arcgis.com/apps/webappviewer/index.html?id=75725977c664459f84ef31e305490fd4>

Figure 13 – Pepco Hosting Capacity Map, Zoomed In to White House and Surroundings

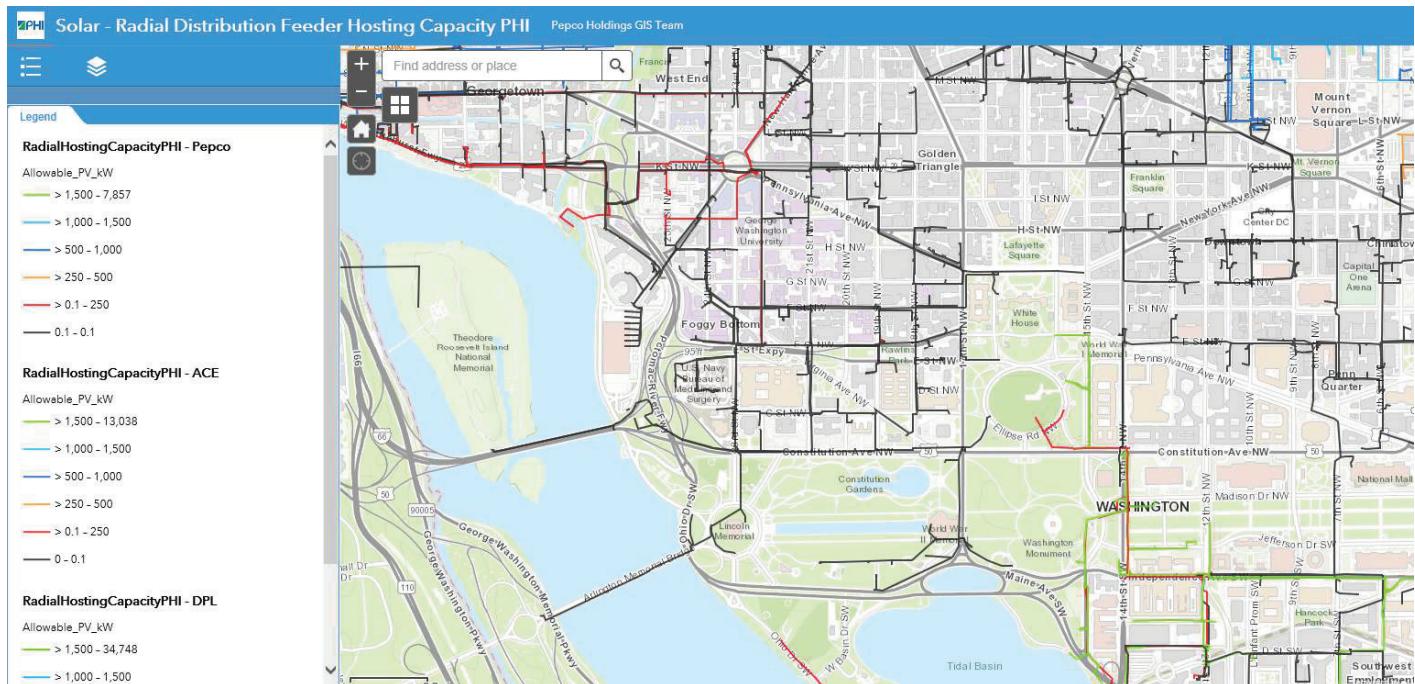


Figure 14 - Public Advocates Chart of Electric Distribution Asset Data Confidentiality

Public Advocates Office Comparison of Public Versus Confidential DRP Data							
	Facility ID	Equipment ratings	Forecast deficiency in units (MW and %)	Distribution System Upgrade Costs	Circuit Routing	Mapping of Grid Needs	Circuit and Bank load data
PG&E							Application Programming Interface (API)
Test Year 2017 GRC, A-15-09-001	Substation and Circuit Names	New Equipment, e.g. substation banks	MW and % overload	Forecast Upgrade Costs	Redacted	NA	NA
Response to Public Advocates Office Data Request in DRP	Names + ID Numbers	Planned and Emergency Limits	NA	NA	NA	2015 Peaks	NA
June 15, 2018 Motion in DRP¹	Situational - User Registration and NDA	Situational - User Registration and NDA	Situational - User Registration and NDA	Not directly addressed	Not directly addressed	Situational - User Registration and NDA	Not directly addressed
SCE							
Test Year 2018 GRC, A-16-09-001	Substation and Circuit Names	New Equipment, e.g. substation banks	% Overload	Forecast Upgrade Costs	Redacted	NA	Redacted
Response to Public Advocates Office Data Request in DRP	Names + ID Numbers	Planned and Emergency Limits	NA	NA	NA	Peak 2015 loads for Circuits ²	NA
June 15, 2018 Motion in DRP¹	Redact "Facility ID," not Sub or Circuit ID	Equipment Ratings	% Overload Public, MW via calc.	Not directly addressed	Case by Case	Case by Case	Not directly addressed
SOG&E							
Test Year 2019 GRC, A-17-10-007/008	Substation and Circuit Names	New Equipment, e.g. substations	% Overload	Forecast Upgrade Costs	Some Public, Some Redacted	NA	NA
Response to Public Advocates Office Data Request in DRP	Names per 15/15; All IDs Public	Planned and Emergency Limits	NA	NA	NA	Peak 2015 loads	NA
June 15, 2018 Motion in DRP¹	Redact or "Mask"	Redact	Redact MW % public	Redact	Redact	Only Deferrable Projects Public	LNBA Range
Int'l IOUs							
Sept. 26, 2018 Hearing ³	"Not at issue" ⁴	"Not at issue" ⁴	"Not at issue" ⁴	"Not at issue" ⁴	"Not at issue" ⁴	"Not at issue" ⁴	"Not at issue" ⁴

¹ All June 15 motions recommend applying the 15/15 rule to redact any data where customer privacy could be compromised.

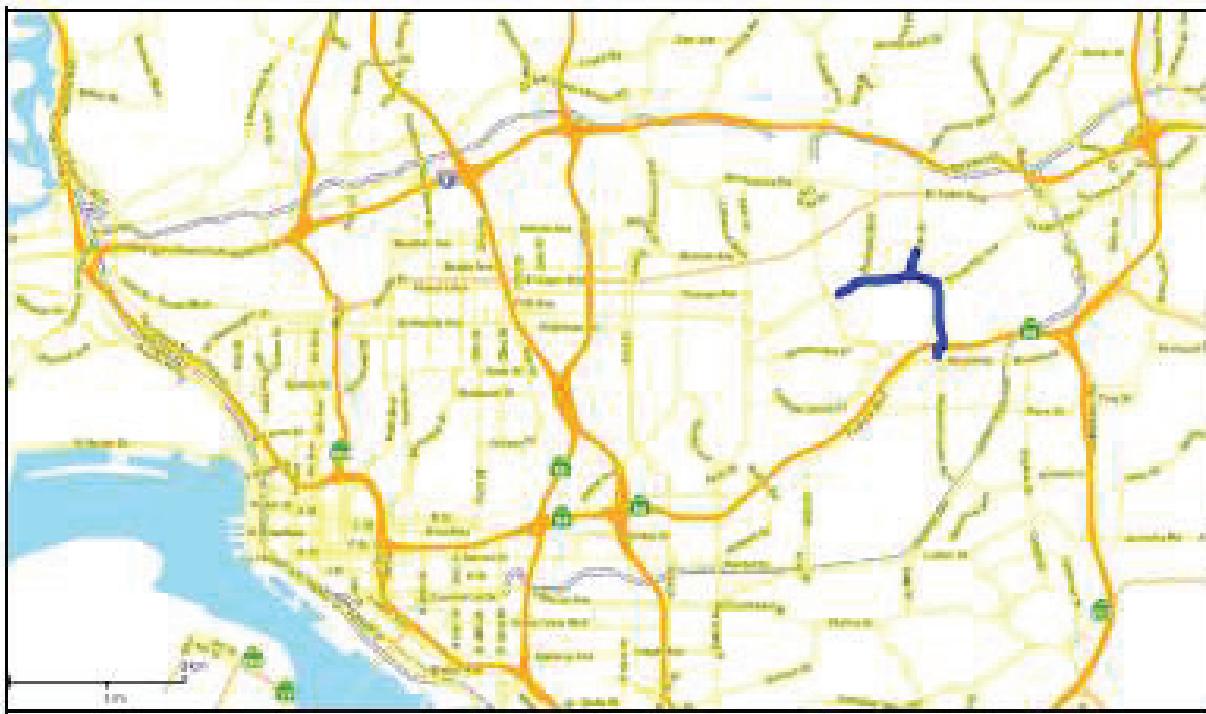
² Circuit loads redacted.

³ IOU testimony at the hearing focused on data related to "circuit line and distribution substation locations." RT Vol. 3, pp. 247-248.

⁴ See hearing transcript, RT Vol. 3, pp. 250-251, and 255, but also see contradictory statement at p. 281.

Legend
Indicated Data is Public
Some Data Public, or Likely Public
Data is Public, except per 15/15 Rule
Data is Confidential

Figure 15 - SDG&E Proposed New 12 kV circuit from Chollas West Substation, Budget Code (BC) 8260



SDG&E TY 2019 GRC, A.17-10-007/008, Exhibit 432, p. 95, SDG&E response to Data Request ORA-SDG&E-018-TCR, Q. 2.

Figure 16 - CEC Interactive Map Showing Chollas Substation and BC 8260 Project Location

