

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298

December 8, 2014

**Advice Letter 4378-E-A**

Ms. Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
San Francisco, CA 94177  
Fax: 415-973-7226  
Email: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**Subject: Proposed Customer Data Access Program**

Dear Ms. Allen:

Energy Division has determined that Advice Letter (AL) 4378-E-A, as filed on March 18, 2014, and as amended on August 15, 2014, is in compliance with Decision (D.) 13-09-025 (Decision) Ordering Paragraphs (OP) 18 and 19. The Advice Letter is approved as amended. This AL presents processes and procedures to implement the Customer Data Access program ordered in the Decision.

**Background**

On March 18, 2014, Pacific Gas & Electric (PG&E) filed a Tier 1 Advice Letter 4378-E (AL). The AL requested approval of its proposed Rule 25, with a requested effective date of April 17, 2014.

On April 7, 2014, protests to the subject Advice Letter were timely filed by EnerNOC, Inc. and Mission:Data, opposing PG&E's proposed "Establishment of the Customer Data Access (CDA) Program for Release of Customer Interval Usage Data to Third Parties and the Associated Rule 25, Release of Customer Data to Third Parties."

Energy Division suspended the AL effective April 17, 2014, to allow additional time for Energy Division to complete its review.

PG&E, along with SCE and PG&E, participated in several discussions with the Energy Division in an attempt to resolve the issues raised in the protests and additional issues raised by the Energy Division. This included review and discussion of multiple suggested revisions to address the issues in the protests. On August 15, 2014, PG&E filed an amendment to the original advice letter at the request of Energy Division.

**Disposition**

PG&E's Advice Letter 4378-E-A, as amended, is acceptable to Energy Division and the protesters.

The Parties protests are denied and PG&E's Advice Letter 4378-E-A is in effect as originally filed, effective August 15, 2014.

Sincerely,

  
Edward Randolph, Director  
Energy Division

Cc:

Michael E. Murray, Mission:Data, via email: [michael@luciddg.com](mailto:michael@luciddg.com)

Jim Hawley, Dewey Square Group, via email: [jhawley@deweysquare.com](mailto:jhawley@deweysquare.com)

Sara Steck Myers, via email: [ssmyers@att.net](mailto:ssmyers@att.net)

Mona Tierney-Lloyd, EnerNOC, Inc., via email: [mtierney-lloyd@enernoc.com](mailto:mtierney-lloyd@enernoc.com)

John David Erickson, CPUC Energy Division, via email: [john.erickson@cpuc.ca.gov](mailto:john.erickson@cpuc.ca.gov)



**Brian K. Cherry**  
Vice President  
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Pacific Gas and Electric Company  
77 Beale St., Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415.973.7226

March 18, 2014

**Advice 4378-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Establishment of the Customer Data Access Program for Release of Customer Interval Usage Data to Third Parties and the Associated Electric Rule 25, *Release of Customer Data to Third Parties***

In compliance with Decision (D.) 13-09-025, Ordering Paragraph (OP) 18 and 19, Pacific Gas and Electric Company (PG&E) hereby submits for filing its Electric Rule 25, *Release of Customer Data to Third Parties*. The tariff sheets are listed on Attachment 1 and are attached hereto.

**Purpose**

Pursuant to D.13-09-025, OPs 18 and 19, this Tier 1 advice filing establishes PG&E's service offering to allow third parties access to PG&E customers' interval usage data through the Customer Data Access (CDA) program consistent with PG&E's Rule 27, *Privacy and Security Protections for Energy Usage Data* (Data Privacy Rule).

**Background**

In D.11-07-056, rules were adopted to protect the privacy and security of customer usage data obtained by the California investor-owned electric utilities' (IOUs) Advanced Metering Infrastructure (AMI) systems, as required by Senate Bill (SB) 1476 (Chapter 497). On March 5, 2012, in compliance with D.11-07-56, OP 8, PG&E filed Application 12-03-002 proposing a CDA Program that third parties could use, consistent with the Data Privacy Rules, to access PG&E customers' interval usage data. As part of this Application, PG&E proposed a new Form 79-1147, *Authorization or Revocation of Authorization to Receive Customer Usage Information*, for use in this context. On September 19, 2013, D.13-09-025 was issued establishing guidelines for adoption of the CDA program and ordered the IOUs to file this advice letter seeking approval of tariff offering customer data access services to third parties. The service offering and related tariff is discussed herein.

## **THE CUSTOMER DATA ACCESS PROGRAM**

The IOUs have collaborated extensively to ensure a consistent CDA solution, to enhance customer experience, to mitigate risk, and to ensure consistency of experience for third parties and customers alike through the entire CDA implementation and program process. Furthermore, the IOUs collaborated and coordinated to provide similar standards, data platforms, data types, and similar procedures for access of data by third parties and methods of interacting with customers to make their experience as seamless as possible across the state. The IOUs business processes were assessed to ensure alignment wherever possible. Finally, a WebEx workshop was held on March 6, 2014 with the IOUs and participating vendors where the IOUs presented to these entities the basic construct of the CDA program and answered questions.

The following describes the service offering, third party eligibility requirements, customer authorization, data request fulfillment and security, third party revocation, customer interaction, and the implementation timeline as agreed upon by the IOUs.

### **Customer Data Access Service Offering: Third Parties Access to Customer Interval Usage Data**

The IOUs' service offering, the CDA program, will allow third parties access to customer interval usage data through the CDA platform using the Energy Service Provider Interface (ESPI) standard. The ESPI system is a technology platform which provides customer-authorized release of interval usage data to third parties. The transfer of this data will be supported in a secure, automated manner, consistent with the ESPI standard adopted by the North American Energy Standards Board (NAESB)<sup>1</sup>. Details regarding this automation and security will be found in the following sections detailing those components.

Third parties may request access of customer interval usage data by going online at the IOU's website. Once the third parties' online request has been approved by the IOU, the third parties will be eligible to receive customer interval usage data on a next-day basis. However, they cannot gain access to any customer data until they are authorized to do so by individual customers. Third party access to online customer data will commence one to five days after the customer's online authorization request has been received by the IOU.

At this point in time, the data released through the CDA program will be limited to electric interval usage data and be provided the next-day – which is consistent with national NAESB standards. It is possible that after stabilization of the CDA system, and in accordance with user adoption and regulatory demands, additional data elements may be available in the future.

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<sup>1</sup> REQ. 21.3.1 General Practices for Energy Services Provider Interface (ESPI)

This service offering is at no cost to the third parties for basic machine-to-machine connectivity between the IOU and third parties systems in order to ensure technical capability and to receive data, as specified in PG&E's Electric Rule 25.<sup>2</sup> In the event third parties require technical consultation from the IOU which goes beyond basic machine-to-machine connectivity or if third parties request data beyond the provisions of PG&E's Electric Rule 25, the IOUs may charge a fee for those requests under other Commission-approved tariffs (e.g., Schedule E-CCAINFO).

### **Third Party Eligibility Requirements**

For third parties to be eligible for CDA, they must meet four requirements:

1. Submission of basic company information (e.g. name, contact, Federal tax ID numbers)
2. Acknowledgment of receipt of applicable utility tariff governing customer usage data privacy and the automated transmission of usage data to customer authorized third parties
3. Demonstrated technical eligibility criteria (subject to change at utility's discretion and consistent with national standards)
4. Not be on the California Public Utilities Commission (Commission or CPUC) ineligibility list

Technical eligibility criteria are not yet formally documented, but will likely include elements such as a connectivity test (machine-to-machine) and ensured third parties connectivity. These criteria will be published and displayed on the IOU websites once they are confirmed. Given that they are eligible, third parties will go through a registration process to initiate their participation in the CDA program. The third party registration process includes the following:

1. Third parties ability to register via web portal: third parties are invited to a portal to enter their information, confirm the key corporate contacts, and begin the connectivity process.
2. Acknowledgement of the IOU's Tariff Rules, Terms and Conditions: third parties are provided the applicable tariff rules, as well as standard terms and conditions to read during the registration process, to which they are required to acknowledge and agree prior to advancing through the process.
3. Third parties validation (e.g. valid email, not on ineligible list): an automated system checks the existing CPUC ineligibility list and validates the third parties email to ensure that the contact information and eligibility requirements are met.
4. Third parties / utility connectivity test: Third parties receive instructions to ensure that the machine-to-machine connectivity and communication is secured and that their systems are capable of accessing the customer interval usage data.

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<sup>2</sup> Designation of the Rule number differs across the IOUs.

## **Customer Authorization**

The CDA program is designed to allow customers to release their interval usage data to a third party through an online authorization process. The process includes the following six steps:

1. Customer selects a third party from an approved list
2. Customer enters release of data information (e.g. timeframe, account IDs)
3. Customer agrees to terms and conditions
4. Customer accesses the landing page on third parties website to authorize release of interval usage data by service account
5. Customer accesses the IOU's portal to complete authorization
6. Data will be available to the third parties within one to five days after the online request has been accepted by the IOU (for initial requests, the third parties will be provided 13 months of historical data)

Terms and conditions are facilitated through the PG&E website in "My Energy"<sup>3</sup>. My Energy also permits users to select from displayed account IDs versus needing to enter the account ID information. When customers select a timeframe, they may select a start-date and duration or, if they would like to keep the selection open-ended, they may select "indefinite." Customers will also have the option to submit a hard copy authorization form for participation in the CDA program.

## **Data Request Fulfillment and Security**

Data request fulfillment utilizes a unique ID that connects the customer's service account, the third parties, and the IOU's back-end system. The unique ID (specific to a third party) is used in place of a service account and allows third parties to match data to identify the customer while protecting service account data and ensuring protection of customer data. In addition, data privacy rules must be adhered to by the third parties and acknowledged by the third parties upon registration.

The third parties access and portal are secured through the ESPI standard platform. The ESPI platform facilitates a secure gate to the data through an authorized provisioned token. The ESPI platform ensures that third parties never directly access an IOU server; rather they access a middle server to acquire the secured data.

## **Third Party Revocation**

Revocation of third parties access to customer interval usage data can occur through three different triggers: customer, third parties, or CPUC invoked. Customer revocation is processed through a revocation request. Following such request, both the customer and the third party are notified. Third party invoked revocation could occur under any

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<sup>3</sup> This terms varies across the IOUs

circumstance in which the third party willingly revokes their own access (going out of business, etc.). CPUC invoked revocation can be the result of an investigation of misuse of data, or at the discretion of the CPUC. Under all of these triggers, there will be immediate system revocation of access to future-dated data.

If a customer suspects a third party is misusing their data, it may submit a misuse of data form electronically to the IOU or contact the IOU's customer contact center. The customer may also file a complaint directly with the CPUC. Upon form submission, the IOU will enter a 21 day resolution period during which the third party continues to receive data. Within the 21 days, the IOU is responsible to investigate the claim and its validity. If the IOU reasonably expects that a violation has occurred, the IOU may escalate the complaint to the CPUC via a Tier 2 advice letter. Upon receiving the escalation, the CPUC can request additional analysis, make a revocation decision, or postpone their decision. In the case of a revocation decision, the CPUC will provide direct notification to all IOUs regarding third parties revocations, and the third parties will be automatically added to the CPUC ineligible list to prevent future access of data.

For reporting, the current internal ad hoc reporting and annual authorization (Authorization to Receive Customer Information or Act Upon a Customer's Behalf, Form 79-1095 (CISR)) reports sent to CPUC will be continued and will include the CDA enabled CISRs.

### **Customer Interaction**

PG&E representatives will address program activities, in particular the concerns and interactions with customers and third parties. These representatives will be trained and capable of handling the nuances of the CDA program, and related registration, account management, etc. PG&E is committed to provide technical customer support during registration, processing manual authorizations (CISR forms), responding to program inquiries, and managing misuse of data complaints.

Existing IOU customer contact centers will assist in this support, and will be available for third parties and customers. When appropriate, they will forward on customers and third parties to the CDA program administrators.

### **Implementation Timeline**

PG&E will follow a staggered approach for implementation. Initially, PG&E will implement a "soft launch", partnering with a third party to test stability and user experience. This soft launch will take place in the fourth quarter of 2014.

Following the soft launch and upon system stabilization, PG&E will continue to add third parties, with anticipated "full launch" by end of first quarter of 2015.

For active CISRs pre-CDA implementation, third parties will not be automatically transferred to the CDA platform. Authorization and successful connectivity tests are required for entry. Customers will not be automatically transferred to the CDA platform, as doing so could compromise customer security by aversion of the OAuth process (the creation of the unique ID that allows third parties, PG&E and the customer to share information without revealing the service account number or other sensitive information), required for data privacy and security, as well as data management.

### **PROPOSED TARIFF MODIFICATIONS**

PG&E proposes to establish Rule 25 (Release of Customer Data to Third Parties) to support the implementation of the CDA program. Rule 25 covers the following:

Applicability – includes a definition of “Customer Data,” a reference to the Form 79-1147 titled “Authorization or Revocation of Authorization to Receive Customer Interval Usage Information” that will be used to initiate the process, and reference to a section in Rule 27 as it pertains to third parties.

Customer Authorization/Revocation – includes (a) information regarding the customer authorization process and when the data will be available after the application is processed, (b) customer revocation request processing once PG&E receives the request, and (c) other means of revocation of authorization.

Service Offering – includes (a) timeline when the data will be made available and how long it will be available once the request is processed, (b) type of data that will be offered, (c) how often the data will be updated, and (d) if there are any costs involved in providing such data,

Third Party Eligibility Requirements – includes (a) the basic information a third party must provide in order to register, (b) the requirements necessary for a third party to be able to receive customer data in a secure manner consistent with the NAESB ESPI standards, (c) acknowledgement of receipt of PG&E’s Rule 25 and 27 and terms and conditions, (d) the requirement that third parties provide a clear notice of transparency regarding the data they are collecting, storing, and using, and (e) the requirement of a third parties to provide a Federal Tax ID as a unique identifier to track its registration in CDA across the state IOUs.

Third Party Ineligibility by order of the Commission – includes (a) discussion of the list of ineligible third parties which is posted on the CPUC website, (b) PG&E’s actions with respect to Commission’s list with regards to addressing a violations by the third parties, (c) Commission’s authority to extend, or shorten the resolution period to address a third party violation, and (d) customer’s authorization to release its information to a third party once they have successfully registered.

Limitations of Liability – includes a discussion on limitations of liability.

No cost information is required for this advice filing.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

### **Protests**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than April 7, 2014, which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Facsimile: (415) 703-2200  
E-mail: EDTariffUnit@cpuc.ca.gov

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to PG&E either via E-mail or U.S. mail (and by facsimile, if possible) at the address shown below on the same date it is mailed or delivered to the Commission:

Brian K. Cherry  
Vice President, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

**Effective Date**

PG&E requests that this Tier 1 advice filing become effective on regular notice, **April 17, 2014**, which is 30 calendar days after the date of filing.

**Notice**

In accordance with General Order 96-B, Section IV, a copy of this advice letter is being sent electronically and via U.S. mail to parties shown on the attached list and the parties on the service lists for A.12-03-002, R.08-12-009, and R.08-12-009 Phase 2. Address changes to the General Order 96-B service list should be directed to PG&E at email address [PGETariffs@pge.com](mailto:PGETariffs@pge.com). For changes to any other service list, please contact the Commission's Process Office at (415) 703-2021 or at [Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov). Send all electronic approvals to [PGETariffs@pge.com](mailto:PGETariffs@pge.com). Advice letter filings can also be accessed electronically at: <http://www.pge.com/tariffs>



Vice President, Regulatory Relations

Attachments

cc: Service Lists A.12-03-002, R.08-12-009, and R.08-12-009 Phase 2

# CALIFORNIA PUBLIC UTILITIES COMMISSION

## ADVICE LETTER FILING SUMMARY ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No. **Pacific Gas and Electric Company (ID U39 E)**

Utility type:

ELC       GAS  
 PLC       HEAT       WATER

Contact Person: Kingsley Cheng

Phone #: (415) 973-5265

E-mail: k2c0@pge.com and PGETariffs@pge.com

EXPLANATION OF UTILITY TYPE

ELC = Electric      GAS = Gas  
PLC = Pipeline      HEAT = Heat      WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: **4378-E**

Tier: **1**

Subject of AL: **Establishment of the Customer Data Access Program for Release of Customer Interval Usage Data to Third Parties and the Associated Electric Rule 25, Release of Customer Data to Third Parties**

Keywords (choose from CPUC listing): Compliance, Establish Service, Rules

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other \_\_\_\_\_

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #: D.13-09-025

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: No

Summarize differences between the AL and the prior withdrawn or rejected AL: \_\_\_\_\_

Is AL requesting confidential treatment? If so, what information is the utility seeking confidential treatment for: No

Confidential information will be made available to those who have executed a nondisclosure agreement: N/A

Name(s) and contact information of the person(s) who will provide the nondisclosure agreement and access to the confidential information: \_\_\_\_\_

Resolution Required?  Yes  No

Requested effective date: **April 17, 2014**

No. of tariff sheets: **7**

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: New Electric Rule 25 - Release Of Customer Data To Third Parties

Service affected and changes proposed: N/A

Pending advice letters that revise the same tariff sheets: N/A

Protests, dispositions, and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

**California Public Utilities Commission**  
**Energy Division**  
**EDTariffUnit**  
**505 Van Ness Ave., 4<sup>th</sup> Flr.**  
**San Francisco, CA 94102**  
**E-mail: EDTariffUnit@cpuc.ca.gov**

**Pacific Gas and Electric Company**  
**Attn: Brian K. Cherry**  
**Vice President, Regulatory Relations**  
**77 Beale Street, Mail Code B10C**  
**P.O. Box 770000**  
**San Francisco, CA 94177**  
**E-mail: PGETariffs@pge.com**

Cal P.U.C.  
Sheet No.

Title of Sheet

Cancelling Cal  
P.U.C. Sheet No.

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**ELECTRIC RULE NO. 25**  
**RELEASE OF CUSTOMER DATA TO THIRD PARTIES**

Sheet 1 (N)  
 (N)

**I. APPLICABILITY**

(N)

The following rules apply to PG&E's automated, ongoing provisioning of interval usage data,<sup>1</sup> henceforth referred to as "Customer Data," to customer-authorized third-parties using an electronic platform known as the Customer Data Access (CDA) platform. The data available through this platform is specifically identified in PG&E's customer release form (79-1147), titled "Authorization or Revocation of Authorization to Receive Customer Interval Usage Information" (CISR-CDA). This tariff rule governs PG&E and the following parties:

1. PG&E customers with open service accounts and where advanced metering is installed; and
2. Third parties authorized by PG&E customers in a customer information release form (as designated on Form 79-1147) to receive Customer Data provided that the third parties comply with PG&E's Electric Rule 27 and are eligible pursuant to Section III below. A copy of Rule 27 may be found at PG&E.com.

**II. CUSTOMER AUTHORIZATION/REVOCAION**

- A. **Customer Authorization:** Upon receipt of a completed, executed online customer information release form (Form 79-1147) and third party adherence to this Rule, PG&E shall make Customer Data available to eligible customer-authorized third parties within one to five days.
- B. **Customer-Initiated Revocation of Authorization:** Customers may revoke a third party's authorization to receive Customer Data at any time. Upon receiving the revocation request, PG&E shall cease transmission of the customer's data and shall notify the third party via electronic notification provided by the Third Party within one business day of the customer's revocation of authorization.
- C. **Other Means of Revocation of Authorization:** Authorization for a third party to receive Customer Data may also be revoked automatically by the Commission pursuant to Section V below, or if a third party otherwise becomes ineligible for failure to meet the other requirements of Section V below.

<sup>1</sup> Additional data types may be available through this platform in the future.

(N)

(Continued)





**ELECTRIC RULE NO. 25**  
 RELEASE OF CUSTOMER DATA TO THIRD PARTIES

Sheet 3

**IV. THIRD-PARTY ELIGIBILITY REQUIREMENTS**

(N)

Third Parties are subject to the following conditions in order to obtain and maintain access to Customer Data.

1. **Provide and Update Contact Information:** Third parties must input basic contact information at PG&E's CDA Third Party Registration Web Page, including company/entity's name, federal tax identification number, mailing address, and the names, telephone numbers, mailing addresses, and email addresses for any key business and technical contacts at the company/entity. Third parties are solely responsible for making timely updates to that information, as may be required from time to time.
2. **Technical Eligibility:** Third parties must demonstrate connectivity aptitude through the machine-to-machine verification of the third parties' technical feasibility to receive customer data securely from PG&E, to be described in more detail at PG&E's CDA Third Party Registration Web Page. PG&E shall work in good faith to resolve technical issues that may arise with third parties seeking technical eligibility. Such work will be limited to connectivity to the CDA platform and PG&E will put forth a reasonable effort to resolve technical issues regarding such connectivity. PG&E will not provide technical consulting to resolve any connectivity issues on the side of the third party. Technical eligibility criteria may change, from time to time, consistent with the NAESB ESPI Standard.
3. **Acknowledge Receipt of Applicable Tariff:** Upon determining that a third party is technically eligible to receive Customer Data as provided in Section IV.2, above, the third party must acknowledge receipt of and has read and understands the terms and conditions of PG&E's Rule 27 and this Rule.
4. **Transparency:** Third parties shall continue to provide customers with clear notice regarding their accessing, collection, storage, use, and disclosure of Customer Data.
5. **Identifier:** Third party shall provide PG&E with a Federal Tax ID number which can be used to track its registration in CDA across the state utilities.

Currently authorized third party agents can be found at PG&E's website.

(N)

(Continued)



**ELECTRIC RULE NO. 25**  
**RELEASE OF CUSTOMER DATA TO THIRD PARTIES**

Sheet 4

**V. THIRD PARTY INELIGIBILITY BY ORDER OF THE COMMISSION**

(N)

**A. Commission’s List of Prohibited Third Parties:** Pursuant to D.13-09-025, the Commission may create and maintain a list of third parties whom the Commission has determined are not eligible to receive customer usage data, even when authorized by the customer, under the CDA platform. The list shall be posted on the Commission’s website at [www.cpuc.ca.gov](http://www.cpuc.ca.gov). Should a third party be included on this list, PG&E will deem the list to be an order by the Commission declaring the party ineligible to participate on the CDA platform unless and until either (a) the party’s name is lifted from the Commission’s list of entities prohibited from receiving customer usage data; or (b) the Commission’s order has been stayed or enjoined by the appropriate court or agency. The Commission will also provide direct notification to the PG&E regarding any changes to the list. PG&E is not responsible for creating maintaining or continuously monitoring the Commission’s list.

**B. PG&E’s Actions With Respect To Commission List:** Customers will have access to a “potential violation” form on PG&E’s website which they can electronically submit to PG&E if they suspect third party mishandling of data or non-compliance with this Rule or Rule 27. Customers may also call PG&E Call Center Line to report these suspicious activities. After reviewing case, and in the event that PG&E reasonably suspects that a third party has violated state law or the Commissions’ privacy rules, it shall serve the third party and the Commission’s Energy Division with a notice of the suspected tariff violation along with any information regarding possible wrongdoing. PG&E shall seek to resolve the suspected tariff violations with the third party during a 21-day resolution period, during which time PG&E will continue transmission of data unless otherwise requested by the customer. At its discretion, the Energy Division staff may facilitate resolution of the issues between PG&E and the third party, and may grant an additional 21-day period for resolving the issue. If the matter is not resolved during the period set for resolution, PG&E shall file a Tier 2 advice letter seeking to move the third party to the list of entities ineligible to receive customer data via the CDA platform. PG&E shall provide notice of this filing to all customers who have selected that third party to receive their Customer Data. Until Commission action resolves the matter, PG&E will continue to transmit data, unless otherwise requested by the customer.

**C. Commission Authority and Discretion:** The Commission has authority to reduce or eliminate the 21-day resolution period referenced in the immediately preceding sub-section. The Commission also has the authority to address the advice letter referenced in Section V.B above in an expedited manner, the authority to investigate the issue on its own motion, the authority to address a complaint filed at the Commission by the customer concerning the rules and obligations under this tariff or Rule 27, and the authority to determine the appropriate remedy, if necessary, for any tariff violation.

**D. Customer Authorization:** Successful and valid “registration” with PG&E, pursuant to Sections II.A through V.C above, are necessary but not sufficient conditions before a third party can receive interval usage data under this Rule. Valid and current customer authorization pursuant to Section II is required for data release under this tariff.

(N)

(Continued)





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Sheet 1

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(Continued)

Advice Letter No: 4378-E  
 Decision No. 13-09-025

Issued by  
**Brian K. Cherry**  
 Vice President  
 Regulatory Relations

Date Filed March 18, 2014  
 Effective \_\_\_\_\_  
 Resolution No. \_\_\_\_\_



**ELECTRIC TABLE OF CONTENTS**  
**RULES**

Sheet 21

RULE	TITLE OF SHEET	CAL P.U.C. SHEET NO.
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**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

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Anderson & Poole	G. A. Krause & Assoc.	Praxair
BART	GenOn Energy Inc.	Regulatory & Cogeneration Service, Inc.
Barkovich & Yap, Inc.	GenOn Energy, Inc.	SCD Energy Solutions
Bartle Wells Associates	Goodin, MacBride, Squeri, Schlotz & Ritchie	SCE
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CENERGY POWER	Hanna & Morton	SPURR
California Cotton Ginners & Growers Assn	In House Energy	San Francisco Public Utilities Commission
California Energy Commission	International Power Technology	Seattle City Light
California Public Utilities Commission	Intestate Gas Services, Inc.	Sempra Utilities
California State Association of Counties	K&L Gates LLP	SoCalGas
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Center for Biological Diversity	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
City of Palo Alto	Los Angeles Dept of Water & Power	Sunshine Design
City of San Jose	MRW & Associates	Tecogen, Inc.
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Coast Economic Consulting	Marin Energy Authority	TransCanada
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County of Tehama - Department of Public Works	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Utility Specialists
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