

PUBLIC UTILITIES COMMISSION  
505 Van Ness Avenue  
San Francisco CA 94102-3298



**Pacific Gas & Electric Company**  
**ELC (Corp ID 39)**  
**Status of Advice Letter 4341G/6023E**  
**As of March 1, 2021**

Subject: Amend PG&E Electric and Gas Rules 27.1 to Clarify Availability of Energy Usage and Related Data Pursuant to D.14- 05-016

Division Assigned: Energy

Date Filed: 12-11-2020

Date to Calendar: 12-16-2020

Authorizing Documents: D1405016

<b>Disposition:</b>	<b>Accepted</b>
<b>Effective Date:</b>	<b>12-11-2020</b>

Resolution Required: No

Resolution Number: None

Commission Meeting Date: None

CPUC Contact Information:

[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)

AL Certificate Contact Information:

Annie Ho

415-973-8794

[PGETariffs@pge.com](mailto:PGETariffs@pge.com)

**PUBLIC UTILITIES COMMISSION**  
505 Van Ness Avenue  
San Francisco CA 94102-3298



To: Energy Company Filing Advice Letter

From: Energy Division PAL Coordinator

Subject: Your Advice Letter Filing

The Energy Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number
- Name of Filer
- CPUC Corporate ID number of Filer
- Subject of Filing
- Date Filed
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)
- Effective Date of Filing
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Energy Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Energy Division staff based on the information contained in the Energy Division's PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Energy Division's Tariff Unit by e-mail to  
**[edtariffunit@cpuc.ca.gov](mailto:edtariffunit@cpuc.ca.gov)**



**Erik Jacobson**  
Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B13U  
P.O. Box 770000  
San Francisco, CA 94177

Fax: 415-973-3582

December 11, 2020

**Advice 4341-G/6023-E**

(Pacific Gas and Electric Company ID U 39 E)

Public Utilities Commission of the State of California

**Subject: Amend PG&E Electric and Gas Rules 27.1 to Clarify Availability of Energy Usage and Related Data Pursuant to D.14- 05-016**

**Purpose**

Pursuant to Commission Decision No. (D.) 14-05-016, Pacific Gas and Electric Company (PG&E) submits this Tier 1 advice letter to amend PG&E Electric and Gas Rules 27.1 to clarify that energy usage and related data made available to third-parties for specific purposes under the decision will include third-party energy usage and related data in which PG&E is the billing or ratemaking agent of the third-party, such as Community Choice Aggregator (CCA), Direct Access (DA), and Core Transport Agent (CTA) energy usage and related data, solely for the purposes identified in the decision and subject to the privacy and confidentiality protections in the decision.

**Background**

D.14-05-016 adopted rules that provide access to energy usage and usage-related data to local government entities, researchers, and state and federal agencies when such access is consistent with state law and California Public Utilities Commission (Commission or CPUC) procedures that protect the privacy and confidentiality of the consumer data under the Commission's privacy and confidentiality rules. The decision included a specific Data Request and Release Procedure for disclosure of such energy data, as well as a model Non-Disclosure Agreement to protect the confidentiality and privacy of the data.

PG&E implemented D.14-05-016's data release procedures in its Electric and Gas Rules 27.1.

Since issuance of D.14-05-016 and PG&E Electric and Gas Rules 27.1, a question has arisen as to whether the decision and data release procedure applies to energy usage and related data that PG&E possesses or controls as an agent of third-party energy providers, such as CCAs, DA providers, or CTAs. The purpose of this advice letter is to amend PG&E's Electric and Gas Rules 27.1 to clarify that D.14-05-016's data release

procedures and confidentiality and privacy protections allow and apply to CCA, DA and CTA energy usage and related data requested to be disclosed to third parties in compliance with D.14-05-016.

### **Tariff Revisions**

PG&E proposes to revise its Electric and Gas Rules 27.1 consistent with D.14-05-016 as follows:

#### **Electric Rule 27.1 Amended As Follows (bold italics indicate changes):**

Amend the first paragraph to read as follows:

The following rule provides Pacific Gas and Electric Company's (PG&E's) policies and procedures governing access to energy usage and usage-related data by eligible academic researchers, local government entities, and state and federal agencies ("Third Parties") adopted as Attachment A to California Public Utilities Commission Decision (D.) 14-05-016. ***For the purposes of this rule, "energy usage and usage-related data" includes energy usage and usage-related data related to PG&E's retail customers and data related to customers of third party retail load serving entities for which PG&E acts as agent for the purposes of collecting the data or billing or metering the customers.***

Amend section 5 of the rule to read as follows:

#### 5. Privacy and Information Security Laws

- a. Nothing in this process requires or authorizes PG&E or a third-party to violate any existing privacy or information security laws, rules or orders, including the Commission's privacy rules. Nothing in this process requires or authorizes PG&E or a third-party to transfer, sell, or license energy data that consists of PG&E's ***or any third party's*** intellectual property, trade secrets, or competitively-sensitive data. The transfer, sale or licensing of such intellectual property, trade secrets and competitively sensitive data will be subject to Commission review and approval consistent with existing ***laws and*** Commission rules and orders regarding the sale, transfer or licensing of utility assets.

#### **Gas Rule 27.1 Amended As Follows (bold italics indicate changes)**

Amend the first paragraph to read as follows:

The following rule provides Pacific Gas and Electric Company's (PG&E's) policies and procedures governing access to energy usage and usage-related data by

eligible academic researchers, local government entities, and state and federal agencies (“Third Parties”) adopted as Attachment A to California Public Utilities Commission Decision (D.) 14-05-016. ***For the purposes of this rule, “energy usage and usage-related data” includes energy usage and usage-related data related to PG&E’s retail customers and data related to customers of third party retail load serving entities for which PG&E acts as agent for the purposes of collecting the data or billing or metering the customers.***

Amend Section 5 of the rule to read as follows:

5. Privacy and Information Security Laws

- a. Nothing in this process requires or authorizes PG&E or a third-party to violate any existing privacy or information security laws, rules or orders, including the Commission’s privacy rules. Nothing in this process requires or authorizes PG&E or a third-party to transfer, sell, or license energy data that consists of PG&E’s ***or any third party’s*** intellectual property, trade secrets, or competitively-sensitive data. The transfer, sale or licensing of such intellectual property, trade secrets and competitively-sensitive data will be subject to Commission review and approval consistent with existing ***laws and*** Commission rules and orders regarding the sale, transfer or licensing of utility assets.

For your convenience, redline versions of the tariff revisions are included as Attachment 2.

The submittal would not increase any current rate or change, cause the withdrawal of service, or conflict with any rate reschedule or rule.

### **Protests**

**\*\*\*Due to the COVID-19 pandemic and the shelter at home orders, PG&E is currently unable to receive protests or comments to this advice letter via U.S. mail or fax. Please submit protests or comments to this advice letter to EDTariffUnit@cpuc.ca.gov and PGETariffs@pge.com\*\*\***

Anyone wishing to protest this submittal may do so by letter sent via U.S. mail, facsimile or E-mail, no later than December 31, 2020, which is 20 days after the date of this submittal. 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:

Erik Jacobson  
Director, Regulatory Relations  
c/o Megan Lawson  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B13U  
P.O. Box 770000  
San Francisco, California 94177

Facsimile: (415) 973-3582  
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 submittal become effective upon date of submittal, which is December 11, 2020.

### **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 list for R.18-12-006, R.08-12-009 (Phase 3), R.03-10-003, A.13-12-012, A.17-11-009, and R.19-03-009. Address changes to the General Order 96-B service list





# ADVICE LETTER 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 M)

Utility type:

- ELC       GAS       WATER  
 PLC       HEAT

Contact Person: Annie Ho  
 Phone #: (415) 973-8794  
 E-mail: PGETariffs@pge.com  
 E-mail Disposition Notice to: AMHP@pge.com

EXPLANATION OF UTILITY TYPE  
 ELC = Electric      GAS = Gas      WATER = Water  
 PLC = Pipeline      HEAT = Heat

(Date Submitted / Received Stamp by CPUC)

Advice Letter (AL) #: 4321-G/6023-E

Tier Designation: 1

Subject of AL: Amend PG&E Electric and Gas Rules 27.1 to Clarify Availability of Energy Usage and Related Data Pursuant to D.14-05-016

Keywords (choose from CPUC listing): Compliance

AL Type:  Monthly  Quarterly  Annual  One-Time  Other:

If AL submitted in compliance with a Commission order, indicate relevant Decision/Resolution #: D.14-05-016

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:

Confidential treatment requested?  Yes  No

If yes, specification of confidential information:

Confidential information will be made available to appropriate parties who execute a nondisclosure agreement. Name and contact information to request nondisclosure agreement/ access to confidential information:

Resolution required?  Yes  No

Requested effective date: 12/11/20

No. of tariff sheets: 10

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: See Attachment 1

Service affected and changes proposed<sup>1</sup>: N/A

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

<sup>1</sup>Discuss in AL if more space is needed.

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

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, CA 94102  
Email: [EDTariffUnit@cpuc.ca.gov](mailto:EDTariffUnit@cpuc.ca.gov)

Name: Erik Jacobson, c/o Megan Lawson  
Title: Director, Regulatory Relations  
Utility Name: Pacific Gas and Electric Company  
Address: 77 Beale Street, Mail Code B13U  
City: San Francisco, CA 94177  
State: California Zip: 94177  
Telephone (xxx) xxx-xxxx: (415)973-2093  
Facsimile (xxx) xxx-xxxx: (415)973-3582  
Email: [PGETariffs@pge.com](mailto:PGETariffs@pge.com)

Name:  
Title:  
Utility Name:  
Address:  
City:  
State: District of Columbia Zip:  
Telephone (xxx) xxx-xxxx:  
Facsimile (xxx) xxx-xxxx:  
Email:

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
36642-G	GAS RULE NO. 27.1 Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data Sheet 1	31387-G
36643-G	GAS RULE NO. 27.1 Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data Sheet 2	31388-G
36644-G	GAS RULE NO. 27.1 Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data Sheet 4	31390-G
36645-G	GAS TABLE OF CONTENTS Sheet 1	36640-G
36646-G	GAS TABLE OF CONTENTS Sheet 7	36592-G

Cal P.U.C. Sheet No.	Title of Sheet	Cancelling Cal P.U.C. Sheet No.
48030-E	ELECTRIC RULE NO. 27.1 Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data Sheet 1	34311-E
48031-E	ELECTRIC RULE NO. 27.1 Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data Sheet 2	34312-E
48032-E	ELECTRIC RULE NO. 27.1 Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data Sheet 4	34314-E
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**GAS RULE NO. 27.1**

Sheet 1

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

The following rule provides Pacific Gas and Electric Company's (PG&E's) policies and procedures governing access to energy usage and usage-related data by eligible academic researchers, local government entities, and state and federal agencies ("Third Parties") adopted as Attachment A to California Public Utilities Commission Decision (D.) 14-05-016. For the purposes of this rule, "energy usage and usage-related data" includes energy usage and usage-related data includes data related to PG&E's retail customers and data related to customers of third party retail load serving entities for which PG&E acts as agent for the purposes of collecting the data or billing or metering the customers.

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A. DATA REQUEST AND RELEASE PROCESS

1. PG&E Responsibilities

- a. PG&E will provide a single point-of-contact (POC) for filing and processing third-party energy usage data requests.
- b. The single POC will include a single email mailbox or website and other contact information to which requests for energy data access may be transmitted.
- c. The single POC information will be provided prominently and conveniently on PG&E's website.
- d. PG&E's website will provide access to an electronic input form for third-parties to request energy data access.
- e. PG&E's website is expected to eventually include a Data Catalog of energy data access requests made, fulfilled, and/or denied. New requests for data that have previously been received and fulfilled can easily be made available to eligible third-parties. PG&E will provide data without charge, but may record costs in a memorandum account and subsequently seek recovery via an application or general rate proceeding.
- f. Within one business day of receiving a request form, from a third-party requesting access to energy data, PG&E will respond by email or in writing acknowledging and confirming receipt of the request.
- g. Within seven business days of receiving a request form from a third-party for access to energy data, PG&E will respond by email or in writing regarding whether the information on the form is complete and, if incomplete, what additional information is required for PG&E to process the request.

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<i>Advice</i>	4341-G	<i>Issued by</i>	<i>Submitted</i>	<u>December 11, 2020</u>
<i>Decision</i>	14-05-016	<b>Robert S. Kenney</b>	<i>Effective</i>	<u>December 11, 2020</u>
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	<u></u>



**GAS RULE NO. 27.1**

Sheet 2

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

A. DATA REQUEST AND RELEASE PROCESS (Cont'd)

- 1. PG&E Responsibilities (Cont'd) (L)
  - h. Within 15 business days of receiving a complete request for access to energy data from a third-party, PG&E will respond by email or in writing regarding whether it is able to grant the request, and provide a proposed schedule for providing the requested data. If PG&E responds that it cannot grant access to the data, it will provide specific reasons why it cannot provide the data or offer other options for providing data access (such as providing data listed in the Data Catalog or suggesting modifications to the request such that it could be granted). If the requesting party disagrees with PG&E's rejection of its request for data access or the alternative options offered by PG&E, the third-party may bring the dispute for informal discussion before the Energy Data Access Committee established below in Section 4. (L)
- 2. Non-Disclosure Agreement
  - a. Prior to receiving access to energy data, the requesting party will execute a standard non-disclosure agreement (Form 79-1166) if required by PG&E as directed by D.14-05-016 (Section 7.2), with substantially consistent terms and conditions among PG&E, SCE, SDG&E, and SoCalGas. In addition, if a pre-disclosure review of the third-party's information security and privacy controls and protections is recommended by PG&E, the recommendations will be substantially consistent among PG&E, SCE, SDG&E, and SoCal Gas and published in advance and available on the utilities' websites.
- 3. Terms of Service
  - a. Local governments receiving aggregated and anonymous data need not sign a non-disclosure agreement but must accept the following terms of service (Form 79-1167):
    - 1) The party will use the data for the purposes stated in the request.
    - 2) The party will not release the data to another third party or publicly disclose the data.
    - 3) Prior to the release of any data to a requesting local government PG&E will inform the Executive Director of the Commission via a formal letter four weeks in advance of the proposed transfer. The letter shall contain the following information:
      - a) The purpose identified by the party requesting data.
        - i. A description of the data requested and to be released.

(Continued)



**GAS RULE NO. 27.1**

Sheet 4

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

A. DATA REQUEST AND RELEASE PROCESS (Cont'd)

4. The Energy Data Access Committee (Cont'd)

b. If a party does not accept the recommendation of the Energy Data Access Committee, that party maintains full rights to request a formal consideration of the matter by the Commission via the Commission's petition process. If the Access Committee recommends against providing access to the data requested by a third-party, that party may file a petition with the Commission seeking clarification of access rules. If the Access Committee recommends providing access to the data and a utility declines to follow the recommendation, PG&E should similarly file a petition seeking clarification of Commission policies concerning whether that particular request is consistent with Commission policies and privacy laws.

5. Privacy and Information Security Laws

a. Nothing in this process requires or authorizes PG&E or a third-party to violate any existing privacy or information security laws, rules or orders, including the Commission's privacy rules. Nothing in this process requires or authorizes PG&E or a third-party to transfer, sell, or license energy data that consists of PG&E's or any third-party's intellectual property, trade secrets, or competitively-sensitive data. The transfer, sale or licensing of such intellectual property, trade secrets and competitively-sensitive data will be subject to Commission review and approval consistent with existing laws and Commission rules and orders regarding the sale, transfer or licensing of utility assets. (T)  
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6. Standardized Data Output and Delivery

a. All data outputs will be in standard formats. Data will be accessible in specified formats such as comma-delimited, XML, or other agreed-upon formats. Customized outputs or formats should be avoided. The Energy Data Access Committee can review formats annually to ensure that the utilities are consistent with current technology trends for data sharing formats.

b. Mechanisms for handling data delivery for request of all sizes in a secure manner should be standardized. To the extent possible, PG&E will provide data through the customer data access program adopted in D. 13-09-025. Some requests may be very small and require very little effort to transmit or deliver. Others could be gigabytes in size. In addition, sensitive customer information or other information subject to protections will be transmitted to the third party with reasonable encryption. By standardizing delivery mechanisms, PG&E and third-parties will provide pre-approved delivery methods for sensitive information, reducing risk as well as the time to transmit and receive the data.

(Continued)



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Advice 4341-G  
Decision 14-05-016

Issued by  
**Robert S. Kenney**  
Vice President, Regulatory Affairs

Submitted December 11, 2020  
Effective December 11, 2020  
Resolution



**GAS TABLE OF CONTENTS**

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**ELECTRIC RULE NO. 27.1**

Sheet 1

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

The following rule provides Pacific Gas and Electric Company's (PG&E's) policies and procedures governing access to energy usage and usage-related data by eligible academic researchers, local government entities, and state and federal agencies ("Third Parties") adopted as Attachment A to California Public Utilities Commission Decision (D.) 14-05-016. For the purposes of this rule, "energy usage and usage-related data" includes energy usage and usage-related data includes data related to PG&E's retail customers and data related to customers of third party retail load serving entities for which PG&E acts as agent for the purposes of collecting the data or billing or metering the customers.

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A. DATA REQUEST AND RELEASE PROCESS

1. PG&E Responsibilities

- a. PG&E will provide a single point-of-contact (POC) for filing and processing third-party energy usage data requests.
- b. The single POC will include a single email mailbox or website and other contact information to which requests for energy data access may be transmitted.
- c. The single POC information will be provided prominently and conveniently on PG&E's website.
- d. PG&E's website will provide access to an electronic input form for third-parties to request energy data access.
- e. PG&E's website is expected to eventually include a Data Catalog of energy data access requests made, fulfilled, and/or denied. New requests for data that have previously been received and fulfilled can easily be made available to eligible third-parties. PG&E will provide data without charge, but may record costs in a memorandum account and subsequently seek recovery via an application or general rate proceeding.
- f. Within one business day of receiving a request form, from a third-party requesting access to energy data, PG&E will respond by email or in writing acknowledging and confirming receipt of the request.
- g. Within seven business days of receiving a request form from a third-party for access to energy data, PG&E will respond by email or in writing regarding whether the information on the form is complete and, if incomplete, what additional information is required for PG&E to process the request.

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(Continued)

<i>Advice</i>	6023-E	<i>Issued by</i>	<i>Submitted</i>	<u>December 11, 2020</u>
<i>Decision</i>	14-05-016	<b>Robert S. Kenney</b>	<i>Effective</i>	<u>December 11, 2020</u>
		<i>Vice President, Regulatory Affairs</i>	<i>Resolution</i>	



**ELECTRIC RULE NO. 27.1**

Sheet 2

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

A. DATA REQUEST AND RELEASE PROCESS (Cont'd)

- 1. PG&E Responsibilities (Cont'd) (L)
  - h. Within 15 business days of receiving a complete request for access to energy data from a third-party, PG&E will respond by email or in writing regarding whether it is able to grant the request, and provide a proposed schedule for providing the requested data. If PG&E responds that it cannot grant access to the data, it will provide specific reasons why it cannot provide the data or offer other options for providing data access (such as providing data listed in the Data Catalog or suggesting modifications to the request such that it could be granted). If the requesting party disagrees with PG&E's rejection of its request for data access or the alternative options offered by PG&E, the third-party may bring the dispute for informal discussion before the Energy Data Access Committee established below in Section 4. (L)
- 2. Non-Disclosure Agreement
  - a. Prior to receiving access to energy data, the requesting party will execute a standard non-disclosure agreement (Form 79-1166) if required by PG&E as directed by D.14-05-016 (Section 7.2), with substantially consistent terms and conditions among PG&E, SCE, SDG&E, and SoCalGas. In addition, if a pre-disclosure review of the third-party's information security and privacy controls and protections is recommended by PG&E, the recommendations will be substantially consistent among PG&E, SCE, SDG&E, and SoCal Gas and published in advance and available on the utilities' websites.
- 3. Terms of Service
  - a. Local governments receiving aggregated and anonymous data need not sign a non-disclosure agreement but must accept the following terms of service (Form 79-1167):
    - 1) The party will use the data for the purposes stated in the request.
    - 2) The party will not release the data to another third party or publicly disclose the data.
    - 3) Prior to the release of any data to a requesting local government PG&E will inform the Executive Director of the Commission via a formal letter four weeks in advance of the proposed transfer. The letter shall contain the following information:
      - a) The purpose identified by the party requesting data.
        - i. A description of the data requested and to be released.

(Continued)



**ELECTRIC RULE NO. 27.1**

Sheet 4

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

A. DATA REQUEST AND RELEASE PROCESS (Cont'd)

4. The Energy Data Access Committee (Cont'd)

b. If a party does not accept the recommendation of the Energy Data Access Committee, that party maintains full rights to request a formal consideration of the matter by the Commission via the Commission's petition process. If the Access Committee recommends against providing access to the data requested by a third-party, that party may file a petition with the Commission seeking clarification of access rules. If the Access Committee recommends providing access to the data and a utility declines to follow the recommendation, PG&E should similarly file a petition seeking clarification of Commission policies concerning whether that particular request is consistent with Commission policies and privacy laws.

5. Privacy and Information Security Laws

a. Nothing in this process requires or authorizes PG&E or a third-party to violate any existing privacy or information security laws, rules or orders, including the Commission's privacy rules. Nothing in this process requires or authorizes PG&E or a third-party to transfer, sell, or license energy data that consists of PG&E's or any third-party intellectual property, trade secrets, or competitively-sensitive data. The transfer, sale or licensing of such intellectual property, trade secrets and competitively-sensitive data will be subject to Commission review and approval consistent with existing laws and Commission rules and orders regarding the sale, transfer or licensing of utility assets. (T)  
(T)  
(T)

6. Standardized Data Output and Delivery

a. All data outputs will be in standard formats. Data will be accessible in specified formats such as comma-delimited, XML, or other agreed-upon formats. Customized outputs or formats should be avoided. The Energy Data Access Committee can review formats annually to ensure that the utilities are consistent with current technology trends for data sharing formats.

b. Mechanisms for handling data delivery for request of all sizes in a secure manner should be standardized. To the extent possible, PG&E will provide data through the customer data access program adopted in D. 13-09-025. Some requests may be very small and require very little effort to transmit or deliver. Others could be gigabytes in size. In addition, sensitive customer information or other information subject to protections will be transmitted to the third party with reasonable encryption. By standardizing delivery mechanisms, PG&E and third-parties will provide pre-approved delivery methods for sensitive information, reducing risk as well as the time to transmit and receive the data.

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Advice 4321-G/6023-E  
December 11, 2020

## **Attachment 2**

### **Redline Tariffs**





**GAS RULE NO. 27.1**

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

Sheet 4

(N)  
(N)  
(N)

A. DATA REQUEST AND RELEASE PROCESS (Cont'd)

(N)

4. The Energy Data Access Committee (Cont'd)

b. If a party does not accept the recommendation of the Energy Data Access Committee, that party maintains full rights to request a formal consideration of the matter by the Commission via the Commission's petition process. If the Access Committee recommends against providing access to the data requested by a third-party, that party may file a petition with the Commission seeking clarification of access rules. If the Access Committee recommends providing access to the data and a utility declines to follow the recommendation, PG&E should similarly file a petition seeking clarification of Commission policies concerning whether that particular request is consistent with Commission policies and privacy laws.

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b. Mechanisms for handling data delivery for request of all sizes in a secure manner should be standardized. To the extent possible, PG&E will provide data through the customer data access program adopted in D. 13-09-025. Some requests may be very small and require very little effort to transmit or deliver. Others could be gigabytes in size. In addition, sensitive customer information or other information subject to protections will be transmitted to the third party with reasonable encryption. By standardizing delivery mechanisms, PG&E and third-parties will provide pre-approved delivery methods for sensitive information, reducing risk as well as the time to transmit and receive the data.

(N)

(Continued)

Advice 3501-G  
Decision 14-05-016

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

Date Filed July 30, 2014  
Effective August 29, 2014  
Resolution





**ELECTRIC RULE NO. 27.1**

Access to Energy Usage and Usage-Related Data  
While Protecting Privacy of Personal Data

Sheet 4

(N)  
(N)  
(N)

- A. DATA REQUEST AND RELEASE PROCESS (Cont'd) (N)
- 4. The Energy Data Access Committee (Cont'd) |
- b. If a party does not accept the recommendation of the Energy Data Access Committee, that party maintains full rights to request a formal consideration of the matter by the Commission via the Commission's petition process. If the Access Committee recommends against providing access to the data requested by a third-party, that party may file a petition with the Commission seeking clarification of access rules. If the Access Committee recommends providing access to the data and a utility declines to follow the recommendation, PG&E should similarly file a petition seeking clarification of Commission policies concerning whether that particular request is consistent with Commission policies and privacy laws. |
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(Continued)

Advice	4468-E	Issued by	July 30, 2014
Decision	14-05-016	<b>Brian K. Cherry</b>	August 29, 2014
		Vice President	
		Regulatory Relations	

**PG&E Gas and Electric  
Advice Submittal List  
General Order 96-B, Section IV**

AT&T  
Albion Power Company

Alta Power Group, LLC  
Anderson & Poole

Atlas ReFuel  
BART

Barkovich & Yap, Inc.  
California Cotton Ginners & Growers Assn  
California Energy Commission

California Hub for Energy Efficiency  
Financing

California Alternative Energy and  
Advanced Transportation Financing  
Authority  
California Public Utilities Commission  
Calpine

Cameron-Daniel, P.C.  
Casner, Steve  
Cenergy Power  
Center for Biological Diversity

Chevron Pipeline and Power  
City of Palo Alto

City of San Jose  
Clean Power Research  
Coast Economic Consulting  
Commercial Energy  
Crossborder Energy  
Crown Road Energy, LLC  
Davis Wright Tremaine LLP  
Day Carter Murphy

Dept of General Services  
Don Pickett & Associates, Inc.  
Douglass & Liddell

East Bay Community Energy Ellison  
Schneider & Harris LLP Energy  
Management Service  
Engineers and Scientists of California

GenOn Energy, Inc.  
Goodin, MacBride, Squeri, Schlotz &  
Ritchie

Green Power Institute  
Hanna & Morton  
ICF

IGS Energy  
International Power Technology  
Intestate Gas Services, Inc.  
Kelly Group  
Ken Bohn Consulting  
Keyes & Fox LLP  
Leviton Manufacturing Co., Inc.

Los Angeles County Integrated  
Waste Management Task Force  
MRW & Associates  
Manatt Phelps Phillips  
Marin Energy Authority  
McKenzie & Associates

Modesto Irrigation District  
NLine Energy, Inc.  
NRG Solar

Office of Ratepayer Advocates  
OnGrid Solar  
Pacific Gas and Electric Company  
Peninsula Clean Energy

Pioneer Community Energy

Redwood Coast Energy Authority  
Regulatory & Cogeneration Service, Inc.  
SCD Energy Solutions  
San Diego Gas & Electric Company

SPURR  
San Francisco Water Power and Sewer  
Sempra Utilities

Sierra Telephone Company, Inc.  
Southern California Edison Company  
Southern California Gas Company  
Spark Energy  
Sun Light & Power  
Sunshine Design  
Tecogen, Inc.  
TerraVerde Renewable Partners  
Tiger Natural Gas, Inc.

TransCanada  
Utility Cost Management  
Utility Power Solutions  
Water and Energy Consulting Wellhead  
Electric Company  
Western Manufactured Housing  
Communities Association (WMA)  
Yep Energy