



Comments of the Local Government Sustainable Energy Coalition on  
*Draft Streamlined, “One-Stop” Utility Process For Energy Usage Data Access*

May 17, 2013

The LGSEC appreciates utility efforts to standardize the process for requesting energy usage data. We agree that until a more permanent solution is determined, it will be useful for the utilities to standardize the procedures by which local governments and other entities can access energy usage data. The comments we offer informally today are directed at the proposal from the utilities as a stopgap, until the California Public Utilities Commission determines a long-term method for allowing appropriate access to energy usage data. The ongoing proceedings have been helpful to the LGSEC in recognizing the value of a third party solution for energy usage data. We are particularly intrigued by the concept of a web portal through which parties could access data, with appropriate clearance and agreements, as suggested by the Electronic Frontier Foundation in a recent working group meeting.

Specific to the proposal circulated by PG&E on May 9, the LGSEC offers the following comments. We appreciate that the proposed protocol is short and simple.

Point #1.a – The strawman proposal suggests that requests for data be submitted to an email account. Rather than a manual process, parties should be able to request data through an online data input form (as suggested in 1.c, which seems to conflict with 1.a), with an email address and phone contact provided only for follow-up or customer support. Moving this process to a web portal or other online venue will also address the concerns expressed in point #9 about standardizing the delivery method for data requests.

The LGSEC appreciates concerns over privacy and security. We therefore suggest that any entity using the online data request be required to enter into appropriate non-disclosure agreements, if deemed necessary by the CPUC, ahead of time. This could be as simple as the online agreements that people enter into routinely as part of daily commerce.

Points #2 and #4 – Data should be free of charge for all non-commercial uses.

Points #3 and #4 – The proposal provides deadlines by which the utilities will respond to their ability to fulfill email requests for data. It does not provide any deadlines for when the data will actually be provided. This is the most critical aspect and the point of this proceeding: to provide data in a form that is of use to the requesting party. The protocol should stipulate that these data will be provided by the utility no later than 30 days after the request is complete.

Point #5 – This provision would give the utilities veto authority over any request for data: “if a pre-disclosure review of the third-party’s information security and privacy controls and protections is required by the utility.” The CPUC should determine what data can be provided; indeed, that is the point of the current proceeding. It is not (or should not be) the utilities’ job to

reach into third parties' operations and verify their security procedures. The LGSEC suggests that this provision be eliminated. It should be sufficient that the requesting entity is contractually bound under non-disclosure agreements, as discussed above.

Point #6 – Representation on the proposed “Energy Usage Data Access Advisory Committee” should be more equitably distributed. At minimum, if any committee is established, it must include representation from local governments, non-profits, and academic energy researchers.

Point #8 – This format(s) for data provided must be one that allows the receiving entity to manipulate the data. The data must be provided in a format that can be easily transported to Excel or a statistical analysis package. There also must be some quality control over the data provided. For example, providing CSV data where fields are missing can create huge challenges for the requesting party because those data will not easily transport to analytic tools. There must be a commitment for consistency and clarity in the provision of data.