

Application No: A.18-11-005
Exhibit No.: _____
Witness: Nancy Carrell Lawrence

Application of SOUTHERN CALIFORNIA GAS
COMPANY (U 904 G) to Establish a Demand
Response Program

Application 18-11-005
(Filed November 6, 2018)

CHAPTER 7

SOUTHERN CALIFORNIA GAS COMPANY DEMAND RESPONSE PROGRAM

PREPARED REBUTTAL TESTIMONY OF

NANCY CARRELL LAWRENCE

ON BEHALF OF

SOUTHERN CALIFORNIA GAS COMPANY

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

April 26, 2019

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1 **REBUTTAL TESTIMONY OF NANCY CARRELL LAWRENCE**

2 **I. INTRODUCTION**

3 The purpose of this testimony is to respond to the direct testimony submitted by several
4 intervening parties to the Southern California Gas Company’s (“SoCalGas”) Demand Response
5 (“DR”) Program proceeding, Application (“A.”) 18-11-005. In this Application, SoCalGas seeks
6 approval of a suite of Demand Response Pilot Programs aimed at voluntarily reducing and
7 deferring natural gas usage during system peak periods and an associated foundational “Energy
8 Data Sharing Platform” (“EDSP”) to support and facilitate the DR programs. My testimony will
9 address several recommendations, assertions and analyses pertaining to the EDSP contained in
10 the prepared direct testimonies of the Public Advocates Office (“CalPA”), Mission:data
11 Coalition (“Mission”), Nest Labs (“Nest”), and EnergyHub filed on March 26, 2019.

12 **II. THE COMMISSION SHOULD AUTHORIZE SOCALGAS TO DEVELOP,**
13 **IMPLEMENT AND RECOVER THE COSTS ASSOCIATED WITH BUILDING**
14 **AND OPERATING THE ENERGY DATA SHARING PLATFORM AT THIS**
15 **TIME**

16 **A. The Scope of the EDSP Proposed In SoCalGas’ DR Application Specifically**
17 **Supports the DR Pilot Programs Outlined In Chapter 1,¹ and Current and**
18 **Ongoing Energy Efficiency Programs Implemented By Third Parties Under**
19 **Contract to SoCalGas, all of which are a “Primary Purpose” under**
20 **Commission customer data privacy rules.**

21 The scope, purpose and capabilities of the foundational EDSP proposed in Chapter 2² is
22 designed to specifically support the near-term standardized, automated, secure, and timely
23 transmittal of customer-specific energy-related data required by current and future third-party
24 program implementers and evaluators under contract to SoCalGas. In accordance with

¹ Prepared Direct Testimony of Darren Hanway at 6-19.

² Prepared Direct Testimony of Nancy Carrell Lawrence at 2-6.

1 Commission Privacy rules³ and SoCalGas Tariff Rule No. 42,⁴ these activities constitute a
2 “Primary Purpose” where customer consent for the customer data sharing facilitated by the
3 EDSP to support SoCalGas’ proposed DR Pilot Programs, as well as for any third-party
4 evaluators or third-party Energy Efficiency (“EE”) program implementors under contract to
5 SoCalGas, is not required.⁵

6 In Intervenor Testimony, Mission appears to misunderstand this aspect by making
7 assertions and recommendations that are outside the scope and not relevant to the EDSP
8 proposed in this proceeding.⁶ This includes implying that some of the performance metrics and
9 customer experience aspects associated with and/or under consideration within the electric
10 investor-owned utilities (“IOUs”) Rule 24/32 “Direct Participation” and “Click-Through”
11 authorization proceedings⁷ – which involve data sharing with third parties that constitute
12 “Secondary Purposes” -- are applicable to the EDSP proposed in this proceeding.^{8,9}

13 To the contrary, the scope of the EDSP proposed in this proceeding provides a
14 foundational base to support the nearer-term, “Primary Purpose,” customer data sharing
15 requirements for SoCalGas’ proposed DR programs and current and future EE programs
16 implemented by third parties under contract to SoCalGas. This scope of SoCalGas’ proposal

³ See D.11-07-056 and D.14-05-016.

⁴ SoCalGas Tariffs Rule 42. Advice Letter (AL) 4647 Privacy and Security Protections for Energy Usage Data, Section 1 (d) (4) Definitions at Sheet 2 and Section 6 Use and Disclosure Limitations at Sheet 6. <https://www.socalgas.com/regulatory/tariffs/tm2/pdf/42.pdf>

⁵ Prepared Direct Testimony of Nancy Carrell Lawrence at 2; Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 16.

⁶ Prepared Direct Testimony of Michael Murray on behalf of Mission:data Coalition at 5-6.

⁷ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 16-18.

⁸ Prepared Direct Testimony of Michael Murray on behalf of Mission:data Coalition at 26-29.

⁹ SoCalGas Tariffs Rule 42. Advice Letter (AL) 4647 Privacy and Security Protections for Energy Usage Data, Section 1 (e) (4) Definitions at Sheet 2 and Section 6 Use and Disclosure Limitations at Sheet 8.

1 does not include facilitating a wide range of customer data access circumstances for energy
2 technology providers and program implementors or evaluators who are *not* under contract to
3 SoCalGas or the Commission to implement or evaluate DR or EE programs.

4 While the EDSP will be architected in a manner such that future capabilities may be
5 added on as merited as outlined in Chapter 2¹⁰ and again in Supplemental Testimony¹¹ to support
6 future use cases - such as those that are “Secondary Purposes” requiring customer consent as is
7 the case for the electric IOU Rule 24/32 “Direct Participation” and “Click-Through”
8 authorization proceedings noted above,¹² incorporation of additional requirements and features
9 into the proposed EDSP at this time is not required to execute SoCalGas’ proposed DR Pilot
10 Programs, could result in significant additional ratepayer expense, and is not being proposed by
11 SoCalGas in this application. However, SoCalGas welcomes consideration of future
12 enhancements to the EDSP to support potential future use cases when appropriate and in the
13 appropriate proceedings.

14 **B. Cost Recovery for the EDSP is Merited to Enable DR Third-Party**
15 **Contractor “Behavior Messaging” Pilot Programs And DR EM&V, As Well**
16 **As To Support Both Ongoing And Future EE Program Energy-Related Data**
17 **Sharing Requirements.**

18 CalPA contends that, “[t]he Commission should not consider cost recovery for the
19 Energy Data Sharing Platform (EDSP) before DR Pilots have demonstrated some success.”¹³
20 CalPA goes on to state that it “takes no position on the future merits of SoCalGas’ proposal for
21 an Energy Data Sharing Platform (EDSP). However, at this time the proposal is premature and
22 should not be funded. It is unreasonable to fund infrastructure to facilitate the entry of third-party

¹⁰ Prepared Direct Testimony of Nancy Carrell Lawrence at 4 and 6.

¹¹ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 14-18.

¹² Discussed in further detail in Supplemental Testimony at 16-18.

¹³ Public Advocates Office Prepared Testimony (CalPA Intervenor Testimony) at 1-6 to 1-7.

1 vendors into the natural gas DR market when the existence and viability of that market has not
2 yet been demonstrated by the success of any of the pilots. Therefore, spending \$7.31 million on a
3 platform *now*, while the effectiveness of the natural gas DR programs it will support is unproven,
4 is imprudent.”¹⁴

5 SoCalGas respectively disagrees with CalPA and asserts that now is the time to fund the
6 EDSP proposal. As outlined in Chapter 2¹⁵ and again in Supplemental Testimony,¹⁶ the
7 proposed EDSP information technology platform and services directly support both DR Pilot
8 Program implementation and evaluation of SoCalGas’ proposed natural gas DR Pilot Programs.
9 Specifically, the Behavioral Messaging Pilot proposed in Chapter 1 Prepared Direct Testimony –
10 also noted in Supplemental Testimony¹⁷ has the potential for broad reach across customers and
11 would rely on third-party implementers. Third-party programs of this nature are dependent on
12 the utility to facilitate the automated, timely and secure sharing of customer advanced meter
13 usage through a data sharing platform with capabilities such as those proposed for SoCalGas’
14 EDSP. The EDSP is also critical to facilitate the data transfers to DR program evaluators
15 required to conduct the Evaluation, Measurement, and Verification (“EM&V”) discussed in
16 Chapter 1 and is also critical to support timely post program load impact analysis required to
17 evaluate program effectiveness to potentially adjust program approaches before the next winter
18 season.

19 In addition to being critical to near term DR Pilot Program implementation and
20 evaluation, the EDSP also provides longer term ratepayer value: “The EDSP will provide the

¹⁴ CalPA Intervenor Testimony at 1-7.

¹⁵ Prepared Direct Testimony of Nancy Carrell Lawrence at 20-21.

¹⁶ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 11.

¹⁷ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 5.

1 critical data sharing technology infrastructure foundation required to fully leverage the SoCalGas
2 AMI system to support innovative new DR programs implemented and/or evaluated by third
3 parties. It is envisioned to provide long lasting benefits to SoCalGas customers by stimulating
4 innovation amongst third-party providers of potential DR and EE mobile applications, rewards
5 programs and other tools and programs that support more timely and energy-efficient use of
6 natural gas.”¹⁸ As explained previously, “SoCalGas’ AMI system is well poised to enable the
7 same types of innovative new ‘Integrated Demand Side Management’ customer engagement
8 programs that the three electric IOUs have developed leveraging their respective smart meter
9 deployments.”¹⁹ And “The EDSP proposed in this application is consistent and aligned with
10 investments made by the three electric IOUs to build out their respective customer data sharing
11 platforms in support of DR and EE programs.”²⁰

12 While Chapter 2 emphasizes that the EDSP is critical to enable the Behavioral Messaging
13 Pilot and the DR EM&V for the greatly scaled up DR pilot program portfolio outlined in Chapter
14 1,²¹ it also notes that “The EDSP will also support similar requirements for automated transfer of
15 AMI usage data and other customer data to DR program evaluators, as well as to third parties
16 under contract to SoCalGas and/or to Statewide Lead Program Administrators to implement
17 innovative, new Energy Efficiency (EE) programs as contemplated in SoCalGas’ Energy
18 Efficiency Business Plan.”²² As noted in SoCalGas Supplemental Testimony,²³ “Commission

¹⁸ Prepared Direct Testimony of Nancy Carrell Lawrence at 3.

¹⁹ Prepared Direct Testimony of Nancy Carrell Lawrence at 5.

²⁰ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 11.

²¹ Prepared Direct Testimony of Nancy Carrell Lawrence at 20-21.

²² Prepared Direct Testimony of Nancy Carrell Lawrence at 2.

²³ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 11.

1 policy and precedent in both Energy Efficiency and Demand Response proceedings support
2 SoCalGas' request to authorize and establish an EDSP" and observes that "IT infrastructure,
3 services and support associated with DR program implementation are also a significant element
4 within the three California electric IOUs' DR program applications."²⁴

5 The Commission has previously endorsed and directed the electric IOUs to build out their
6 customer energy-related data sharing platforms to support the implementation requirements of
7 utility DR and EE programs.²⁵ As SoCalGas outlines in its Supplemental Testimony, "[t]he
8 Commission has also expressed its support and directives to the investor-owned utilities (IOUs)
9 to build out their respective energy data sharing platforms through multiple and ongoing
10 proceedings. As discussed in Chapter 2, in the context of the Smart Grid proceeding, and
11 following on the coat-tails of the three electric IOUs' smart meter deployments, the Commission
12 ordered and authorized the three electric IOUs to build out their initial energy data sharing
13 platforms. And as noted on page 9, in D.13-09-025, 'Decision Authorizing Provision of
14 Customer Energy Data to Third Parties Upon Customer Request,' the Commission noted that it
15 'would welcome considering applications that would provide gas usage data as well.' EDSP
16 capabilities were not authorized or funded as part of SoCalGas' Advanced Meter Decision
17 (D.10-04-027), which was authorized prior to the launch of the Green Button Initiative in 2012
18 and prior to the Commission's authorization of similar capabilities for the three California
19 electric IOUs."²⁶

²⁴ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 12.

²⁵ See D.13-09-025.

²⁶ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 12-13.

1 Consistent with the Commission’s ongoing support for the build-out of customer energy
2 data sharing platforms, several intervenors in this proceeding who are industry leader and
3 influencer in innovative DR and EE technology platforms have expressed their support for the
4 EDSP and/or SoCalGas’ proposed DR pilot programs more broadly. This includes Mission
5 which states that it “supports Southern California Gas Company’s (“SoCalGas” or “SCG”)
6 application to institute a demand response program because we believe that innovative new
7 offerings are able to cost-effectively reduce peak natural gas demand.” And “We also support
8 the concept of the application’s Energy Data Sharing Platform....” (subject to several described
9 amendments).²⁷ EnergyHub and Nest, both members of the Mission and intervenors in this
10 proceeding, while not offering positions regarding the EDSP proposal, both expressed their
11 overall support for SoCalGas proposed DR Pilot Programs in their testimony as well.²⁸

12 Based on the foregoing, it is clear that the ongoing ratepayer value of the EDSP is most
13 definitely not entirely dependent “on the success of pilots that have not yet been run...” as
14 CalPA contends.²⁹ The Behavioral Messaging pilot, a major element in Chapter 1 with the
15 potential to have broad reach across SoCalGas customers cannot be accomplished without the
16 EDSP to facilitate data sharing for both program implementation and timely evaluation and
17 feedback. The basic data sharing capabilities that the EDSP supports are required in the near
18 term for both DR and EE programs administered by third-party implementors under contract to
19 SoCalGas and will provide a foundational IT platform to enable and facilitate the expansion to
20 additional ratepayer energy-savings capabilities in the future.

²⁷ Prepared Direct Testimony of Michael Murray on behalf of Mission: data at 3.

²⁸ Prepared Direct Testimony of Erika Diamond for EnergyHub at 2-3 and Prepared Direct Testimony of Richard Counihan on behalf of Nest Labs at 2 and 11.

²⁹ CalPA Intervenor Testimony at 1-7.

1 **C. EDSP Capabilities Were Not Authorized as Part of The SoCalGas AMI**
2 **Decision, Are Incremental To SoCalGas’ AMI Deployment Scope, Funding**
3 **and Commission Requirements, and Therefore Ratepayer Funding Is**
4 **Merited.**

5 Mission recommends in their prepared direct testimony that: “The proposed Energy Data
6 Sharing Platform (EDSP) should be built, but without additional ratepayer funds.”³⁰ Mission
7 goes on to state that, “If ratepayer funds were to be used, it would, in my opinion, be ‘double-
8 dipping’ ...”³¹ Mission’s testimony implies that SoCalGas’ Advanced Meter Infrastructure
9 (“AMI”) Decision (“D.”) 10-04-027 encompassed funding and included Commission orders
10 which included the scope of the EDSP capabilities outlined in Chapter 2 of SoCalGas’ Demand
11 Response Application.

12 Mission in this regard are not accurate. The Commission’s authorization of SoCalGas’
13 AMI deployment, the scope of the IT systems authorized within the SoCalGas AMI Decision,
14 and the actual implementation of SoCalGas’ AMI system did not include the five EDSP
15 capabilities outlined in Chapter 2.³²

16 Additionally, it is important to point out that SoCalGas’ AMI deployment, including the
17 build out of its IT systems associated with the deployment, complied with the Commission
18 directives in D.10-04-027. Ordering Paragraph 3 of D.10-04-027 includes the following
19 directive: “SoCalGas shall offer customers direct access to near-real time gas usage data ... and
20 provide access to such AMI data to customer authorized third parties, on a timeline concurrent
21 with meter installation.” Commensurate with the deployment of the first advanced meters in fall
22 2012, SoCalGas met this requirement by providing SoCalGas customers the ability to view their

³⁰ Prepared Direct Testimony of Michael Murray on behalf of Mission: data at 5.

³¹ Prepared Direct Testimony of Michael Murray on behalf of Mission: data at 6.

³² Prepared Direct Testimony of Nancy Carrell Lawrence at 9-15.

1 AMI-enabled interval usage data, as well as to export and share it with third parties of their own
2 choosing, through the “Analyze Usage” tool features available within the SoCalGas.com, “My
3 Account” customer portal. SoCalGas also deployed a Green Button Download My Data^{®33}
4 feature within My Account, as well as a new “CISR”³⁴ form associated with its AMI
5 deployment. The CISR form enabled customers to authorize the transfer (electronically if
6 desired) of their interval usage data to third parties of the customer’s choosing. All of these
7 capabilities were consistent with the prevailing technology for data transfers of smart meter-
8 enabled customer interval usage data offered by the three California electric IOUs and other
9 utilities at that time.³⁵

10 Third party “access to a customer’s usage data via the utility’s backhaul” was not funded
11 as part of the three California electric IOUs smart meter deployments, or as part of SoCalGas
12 AMI decision, and was ordered by the Commission for *only the electric IOUs* subsequent to the
13 electric IOU’s completion of their smart meter deployments in D.11-07-056 (as noted in Chapter

³³ The distinction between “Green Button Download My Data[®]” and “Green Button Connect My Data[®]” can be found here: <https://www.energy.gov/data/green-button>

³⁴ “AUTHORIZATION OR REVOCATION OF AUTHORIZATION TO RECEIVE CUSTOMER INTERVAL USAGE INFORMATION, FORM 8204” [https://www.socalgas.com/regulatory/tariffs/tm2/pdf/CISR_\(Usage\).pdf](https://www.socalgas.com/regulatory/tariffs/tm2/pdf/CISR_(Usage).pdf). “This form authorizes the third party of the customer’s choosing to request and receive the customer’s natural gas interval usage data only.”

³⁵ The Green Button initiative was officially launched in January 2012, with utilities internationally first deploying the Green Button Download[®] feature. <https://obamawhitehouse.archives.gov/blog/2015/07/22/green-button-initiative-makes-headway-electric-industry-and-consumers> The Green Button Connect My Data[®] concept subsequently first started to roll-out in 2013 and has only gained significant headway in the last several years, well after the customer energy presentment IT systems associated with SoCalGas authorized AMI scope deployment were established concurrent with the initial roll-out of SoCalGas advanced meters in 2012. <https://www.greenbuttonalliance.org/history>

1 2).³⁶ As further noted in Chapter 2,³⁷ “Through D.13-09-025, ‘Decision Authorizing Provision
2 of Customer Energy Data to Third Parties Upon Customer Request,’ the Commission
3 subsequently authorized Pacific Gas and Electric Company (“PG&E”) to recover up to \$19.4
4 million in costs to support their ‘Customer Data Access Project’ and Southern California Edison
5 to recover up to \$7.588 million to develop its platform third-party access to customer usage data,
6 and additional \$1.512 million in incremental ongoing operations costs. In 2017, the Commission
7 continued to direct the three electric IOUs to build out their information technology (“IT”)
8 infrastructure to further streamline, simplify and automate their sharing of energy data with third-
9 party electric DR providers, approving an additional up to \$12 million investment through the
10 ‘Click-Through Authorization Process’ Resolution E-4868.”

11 As also previously noted, the Commission stated in D.13-09-025 that it “would welcome
12 considering applications that would provide gas usage data as well,” acknowledging that AMI
13 customer data sharing capabilities through the utility backhaul had *not yet been authorized* for
14 SoCalGas.³⁸

15 The Commission has fully supported, endorsed and ordered the build-out of energy data
16 sharing platforms for the electric IOUs. Based on the Commission’s previous direction noted

³⁶ In D.11-07-056, Ordering Paragraph (“OP”) 8, the Commission directed the utilities as follows: “Within six months of the mailing of this decision, Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas and Electric must each file an application that includes tariff changes which will provide third parties access to a customer’s usage data via the utility’s backhaul when authorized by the customer. The three utilities should propose a common data format to the extent possible and be consistent with ongoing national standards efforts. The program and procedures must be consistent with policies adopted in Ordering Paragraphs 6 and 7 and the Rules Regarding Privacy and Security Protections for Energy Usage Data in Attachment D of this decision. The application should propose eligibility criteria and a process for determining eligibility whereby the Commission can exercise oversight over third parties receiving this data. The three utilities are encouraged to participate in a technical workshop to be held by the Commission in advance of the filing date. The applications may seek recovery of incremental costs associated with this program.”

³⁷ Prepared Direct Testimony of Nancy Carrell Lawrence at 4-5.

³⁸ Prepared Direct Testimony of Nancy Carrell Lawrence at 9.

1 above, and the fact that the SoCalGas AMI deployment is more than 99% complete, SoCalGas'
2 proposal for the EDSP is consistent with the same capabilities for secure and automated energy-
3 related customer data sharing through utility back end systems for natural gas.

4 **D. SoCalGas' Design and Implementation of the EDSP Will Serve the Intended**
5 **Purposes Relevant to the DR Programs Proposed in its Application, and**
6 **Include "Future-Proofing" for Potential Future Use Cases.**

7 Mission states that: "The EDSP as proposed should be substantially modified to
8 incorporate best practices, including, but not limited to, (1) the provision of account and billing
9 information, (2) a streamlined customer experience and (3) consideration of a centralized
10 platform."³⁹

11 SoCalGas agrees with Mission's first point that the EDSP should facilitate data transfers
12 that include the provision of account and billing information as these data elements are required
13 and necessary for DR and EE third-party program implementations or evaluations under contract
14 to SoCalGas. As described in Chapter 2 in Figure 2 and Figure 3, and on pages 14 and 15, the
15 capabilities supported by the EDSP are contemplated to include account and billing information
16 as required to support the DR programs outlined in Chapter 1, thus a modification in the EDSP
17 proposal is not required to incorporate these elements.

18 With respect to Mission's second point, SoCalGas believes that the customer experience
19 for each of the DR Pilot Programs described in Chapter 1 should be designed in a manner to
20 optimize customer enrollment (as applicable), uptake, and engagement/participation.

21 Mission, however, is advocating for a good customer experience within the EDSP itself.
22 It appears Mission again misunderstood what SoCalGas is seeking authority to do or is
23 unnecessarily expanding the scope of the EDSP proposed in Chapter 2, which as discussed

³⁹ Prepared Direct Testimony of Michael Murray on behalf of Mission: data at 5.

1 previously does not require or include a customer authorization-related capability, such as
2 “Click-Through” authorization.

3 With respect to Mission’s suggestion outlined above that in general “the EDSP as
4 proposed should be substantially modified to incorporate best practices,” the scope and
5 implementation plan for the EDSP project as set out in Chapter 2 specifically includes
6 consideration of best practices as it pertains to the implementation of the DR programs in its
7 Application, as well as “future-proofing” to support potential future use cases. As stated in
8 SoCalGas’ Supplemental testimony, “Though the scope of the EDSP proposed in this application
9 is specifically linked to capabilities required to support implementation of its DR programs, the
10 platform will be designed, architected and ‘future-proofed’ such that its capabilities can be
11 further expanded as merited through other appropriate proceedings and funding mechanisms.”⁴⁰

12 The capabilities and conceptual architecture on which EDSP high-level IT project costs
13 were estimated were developed with the goal that the system could be expanded to support future
14 use cases, including the potential future addition of a “Green Button Connect My Data[®]”
15 customer-authorization platform through a follow-on phase if circumstances merited.

16 In general, it is premature to state that the EDSP proposal needs to be substantially
17 modified as the final detailed functional and technical requirements and specifications for the
18 EDSP, and the ultimate final IT design and software architecture to meet those specifications,
19 will be determined with key internal and external stakeholder input once the ESDP IT project is
20 initiated. The “requirements phase” of the EDSP IT project implementation whereby the
21 functional requirements and specifications will be thoroughly detailed and vetted with
22 stakeholder input will include determination of the full set of customer account, billing, usage

⁴⁰ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 13-14.

1 and other data elements required to support the DR programs outlined in Chapter 1, and to
2 enable the addition of additional data elements in the future as merited and authorized to support
3 future use cases.

4 With respect to Mission’s assertion that the EDSP should include “consideration of a
5 centralized platform,” and later on page 22 stating: “Mission: data supports the consideration of a
6 centralized platform across various utilities for data-sharing capabilities...” SoCalGas maintains
7 that consideration of a such single centralized platform is out of scope for this proceeding, and
8 also is not required or relevant as part of the IT infrastructure required to specifically support the
9 DR Pilot Programs proposed in this Application.

10 Considerations pertaining to a single centralized energy data center platform were
11 considered extensively in workshops and ongoing discussions associated with the Smart Grid
12 “Phase III Energy Data Center”⁴¹ proceeding. As noted in this decision, these workshops
13 ultimately “anticipated that these steps might ameliorate the immediate need for a data center.⁴²”
14 The Commission further notes in this decision that, “Therefore, the Commission continues to see
15 the importance of exploring the value of a dedicated energy data center in the future to increase
16 access to data while developing reasonable protections on customer privacy.”⁴³

17 D.14-06-016 stated that, “[i]n contrast, ORA expresses support for the utilities straw
18 proposal, stating that ‘it obviates the need to build a costly and duplicative Energy Data
19 Center.’”⁴⁴

20 Exploration of a concept of this magnitude and importance, especially considering ever-
21 increasing privacy and security regulations and industry practices, requires a comprehensive

⁴¹ D.14-05-016.

⁴² D.14-05-016 at 6.

⁴³ D.14-06-016 at 28.

⁴⁴ D.14-05-016 at 83.

1 proceeding such as the Smart Grid Phase III proceeding. In the event a separate Commission
2 proceeding were initiated to further investigate and evaluate this concept, or further standardized
3 data sharing, including to non-contracted third parties requiring customer consent, SoCalGas
4 would be an active participant.

5 **E. SoCalGas' Design and Implementation of the EDSP Will Include**
6 **Incorporation of Relevant Performance Metrics**

7 Mission states that: "The EDSP should incorporate performance metrics and web-based
8 reporting to ensure accountability."⁴⁵ In response to Mission's question: "Why is public
9 reporting of EDSP metrics so important?" Mission goes on to state that, "Rather than simply
10 trust that utilities will do the right thing in the future to ensure a high-performing IT system, the
11 Commission should require SCG to follow specific best practices and demonstrate an
12 understanding of key lessons learned from the electric IOUs' implementation of data-sharing
13 platforms. Commission staff recently acknowledged many of the performance issues in the
14 electric IOUs' data-sharing systems: 'Some IOUs have been slow to address information
15 technology issues that support these online data access platforms. While progress has been made
16 in some areas, the overall data access process has been slow and cumbersome for some users.'"⁴⁶

17 As SoCalGas outlined in its Supplemental Testimony on this topic,⁴⁷ and addressed in the
18 first section above, "The EDSP and DR pilot programs proposed in this Application do not
19 require or include a similar 'Click-Through Authorization Process' (Click-Through) or
20 capability, thus many of the metrics pertaining to Res. E-4868 and the subsequent electric IOU's
21 applications would not apply. Currently the Demand Response behavioral messaging pilot

⁴⁵ Prepared Direct Testimony of Michael Murray on behalf of Mission:data at 5.

⁴⁶ Prepared Direct Testimony of Michael Murray on behalf of Mission:data at 28-29.

⁴⁷ Prepared Consolidated Supplemental Testimony of Darren Hanway and Nancy Carrell Lawrence on behalf of Southern California Gas Company at 14-17.

1 SoCalGas is proposing would be administered by third-party implementers under contract to
2 SoCalGas.” SoCalGas goes on to state that, “Although customer-facing web page based “Click-
3 through” capabilities are not part of the proposed scope of the EDSP, data delivery and quality
4 performance metrics of the nature the Commission describes in Res. E-4868 would be applicable
5 to the EDSP: “In addition to metrics related to the performance of OAuth Solution 3, we find it
6 reasonable to monitor other aspects of delivery, and delivery time for missing or gaps in data,
7 among other aspects.”

8 SoCalGas believes relevant performance metrics should be incorporated in to the
9 foundational EDSP, which as outlined will support DR and EE program implementations by
10 third parties under contract to SoCalGas. Under these circumstances, including those described
11 in Chapter 1 of SoCalGas DR Application, SoCalGas is ultimately administering, overseeing and
12 accountable for the programs implemented by third parties on its behalf. Thus, SoCalGas does
13 not believe that the additional ratepayer expense to build and staff a public-facing website to
14 report metrics of the nature associated with DR and EE program implementations operated under
15 SoCalGas’ oversight is merited.

16 This concludes my prepared rebuttal testimony.