SOUTHERN CALIFORNIA GAS COMPANY

APPLICATION TO ESTABLISH A DEMAND RESPONSE PROGRAM
(D.18-11-005)

(Mission:data Data Request-02)

DATE RECEIVED: April 05, 2019
DATE RESPONDED: April 19, 2019

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QUESTION 1:

See SCG's response to M:d1-7, in which SCG replies, "All of the elements of the EDSP differ from the information technology investments approved for SoCalGas' advanced metering infrastructure pursuant to D.10-04-027 or other decisions."

   (a) Will the EDSP as proposed include any element in Prepared Direct Testimony of Nancy Carrell Lawrence at p. 10, Figure 2, marked "Back End – Data Layer"? If so, please explain in detail.
   (b) Will the EDSP as proposed include any reproduction of customer billing, account, usage or other data that will be stored at rest in a database of any type? If so, please explain in detail.

RESPONSE 1:

   (a) The EDSP as proposed will include within the "Back End – Data Layer"a "Data Management" capability as illustrated in Figure 2 with the label "V. Data Management" and in Appendix A, Figure 3, as shown in the red "Data Management" figure to the right of the diagram. This Data Management capability was not an element of the information technology investments approved for SoCalGas' advanced metering infrastructure pursuant to D.10-04-027 or other decisions.

   The sub-capabilities of the Data Management process capability are outlined and further described in Chapter 2[1]. As described at the top of page 15, "The Data Management process makes sure that the appropriate data is gathered from SoCalGas' internal systems and formatted in pre-determined, standard data formats:…"

   The internal systems from which the data is gathered through the EDSP Data Management capability shown in the "Back End – Data Layer," such as "Customer/Billing Data" and "Interval/Usage Data," are all pre-existing SoCalGas systems, and are not part of the build-out of the EDSP.

   The "Back End – Data Layer" shown on the diagram shows not only the new, EDSP "Data Management" capability as outlined above, but also illustrates the existing internal source systems for the data that may be used for EDSP-facilitated file transfers to SoCalGas-authorized third-party contractors.

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[1] Chapter 2 Prepared Direct Testimony of Nancy Carrell Lawrence at 14-15.

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(b) No. The data from the existing internal systems discussed above, i.e., from the "Customer/Billing Data" and "Interval/Usage Data" systems, will not be reproduced and stored for the purposes of EDSP-facilitated data transfers.

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QUESTION 2:

    (a) Will the EDSP as proposed include OAuth (any version) or any components of OAuth? If so, please explain in detail.

    (b) Does SCG currently use OAuth (any version) in any of its information technology systems? If so, please explain in detail.

RESPONSE 2:

    (a) The detailed functional and technical requirements and specifications for the EDSP, and the associated final IT technical design and software architecture to meet these requirements – including whether any version or components of OAuth will be used - will be developed with key stakeholder input once the EDSP project is initiated.

    (b) SoCalGas uses OAuth in our Microsoft Azure cloud-based "Active Directory"[2] service that is used to enable single sign-on for many SoCalGas information technology software applications. Per Microsoft, "Azure Active Directory (Azure AD) uses OAuth 2.0 to enable you to authorize access to web applications and web APIs in your Azure AD tenant."[3]

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[2] https://azure.microsoft.com/en-us/services/active-directory/
[3] https://docs.microsoft.com/en-us/azure/active-directory/develop/v1-protocols-oauth-code

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QUESTION 3:

Please see Prepared Direct Testimony of Lawrence at 16:2-4: "Key system requirements included confirming that the current OpenADE data format standards would be followed (at a minimum), as well as Commission and other privacy-related directives, mandates, and best practices." To what specific "best practices" is Ms. Lawrence referring? Please explain in detail.

RESPONSE 3:

"Best practices" as referred to at 16:2-4 refers to any relevant utility industry, IT industry and/or energy technology standards, rules, regulations, Commission decisions, "white papers," working group and workshop findings, lessons-learned, knowledge sharing, etc. Many of these best practices sources and resources are referenced throughout Chapter 2, including references within footnotes 3, 5, 6, 8,15, and 17.

SoCalGas' incorporation of best practices will also include "participation in the joint IOU 'Customer Data Access Committee,' as well as other standards and regulatory forums associated with verifying that the EDSP operates in a manner that is consistent with utility industry energy data standards and best practices."[4]

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[4] Chapter 2 Prepared Direct Testimony of Nancy Carrell Lawrence at 19.

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QUESTION 4:

Does SCG believe it is possible for the EDSP's actual costs to diverge from its estimate based upon any of the following:

(a) The targeted uptime percentage of the EDSP? Why or why not? Please explain in detail. (See SCG's response to M:d1-9(b)).
(b) The targeted time lag between when a data authorization is received, and the data is delivered to the third party? Why or why not? Please explain in detail.
(c) The use of contracted I.T. services, including cloud-based services? Why or why not? Please explain in detail.

RESPONSE 4:

(a) Unknown at this time.
(b) At present, we do not believe this factor would impact the EDSP's actual costs. As outlined in SoCalGas' response #2 to Mission:data Data Request-01, SoCalGas AMI technology is not a "real time" system. It was authorized, funded and built to support "next day" hourly customer energy presentment for its core customers.
(c) At present, we do not believe this factor would impact the EDSP's actual costs. The EDSP project was estimated with the assumption that the detailed functional and technical requirements and specifications for the EDSP, and the associated final IT technical design and software architecture to meet these requirements – including final software components - will be developed once the EDSP project is initiated.

The use of contracted I.T. services, including cloud-based services, will be considered in the context of determining the optimal and most "future-proofed" IT technical design and software architecture for the EDSP.

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QUESTION 5:

    (a) Does SCG believe it is possible to objectively assess whether an I.T. system is built to be "future-proof"? Why or why not? Please explain in detail.

    (b) Does SCG believe there are any clear indicators that an I.T. system, such as the EDSP, has not been built to be "future-proof"? Why or why not? Please explain in detail.

    (c) If the answer to (b) above is yes, what are those indicators?

    (d) What entity, if any, does SCG expect will evaluate the EDSP for being "future-proof"?

RESPONSE 5:

    (a) Yes. SoCalGas has sufficient and considerable IT subject matter expertise, experience and resources to assess these aspects.

    (b) Yes.

    (c) One indicator that an IT system has not been built to be "future-proof" would be that the original scope for the IT project did not include a requirement that the IT system be future-proofed. This was not the case for the EDSP. The scope for the EDSP project as set out in Chapter 2 specifically included consideration of "future-proofing."

    The capabilities and high-level conceptual architecture on which EDSP high-level IT project costs were estimated were developed with the goal that the system could be expanded to support future use cases, including the potential future addition of a "Green Button Connect My Data" customer-authorization platform through a follow-on phase if circumstances merited.[5]

    Another indicator that an IT system was not built to be "future-proof" could be that it was custom built for only one specific "use-case," and thus couldn't be utilized or further expanded to support other potential future use cases leveraging the same platform or software components. As noted above, this was not the case for the EDSP proposal.

    (d) SoCalGas will assess whether the EDSP is built to be "future-proof."

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[5] SoCalGas currently offers customers the ability to extract and share their usage-related information with third parties of their own choosing through a "Green Button Download" and/or "Export" features available within SoCalGas.com, "My Account."