

Joint IOU Questions/Concerns regarding Energy Division's proposed Procurement Database

- 1) The project appears to have skipped the feasibility study and project definition stages.
 - a. Project requires feasibility study and scoping that involves the Investor Owned Utilities ("IOUs") and Energy Division ("ED") to address issues such as:
 - i. Objective of project and reporting requirements, including basis in regulatory proceedings
 - ii. Resources required
 - iii. Costs/benefit analysis
 - iv. Agreement on scope and high level requirements
 - v. Timing of including different contract types (*e.g.*, RPS vs. LTRFO)
 - vi. Proof of concept or live data?
 - vii. Requirements and scope should be memorialized and agreed upon at management level between IOUs and ED to ensure that adequate resources are dedicated, to prevent scope creep, to establish realistic schedules, and to gain stakeholder commitments]

1.a.i. Objective of the database is to allow comprehensive and complete comparisons and analysis of supply side power plant facility and contract information.

1.a.ii. The IOUs will need to provide similar staffing to that already needed to complete other Commission reports, standing data requests, and Energy Division data requests.

1.a.iii. Cost-benefit analysis has been completed. As indicated in D.-07-12-052, amongst other venues, IOU data has been largely incomparable. While Energy Division understands some short-term duplication will occur, the ability to compare data and perform quick data validation outweighs these costs. Additionally the database infrastructure will need to be maintained by Energy Division staff.

1.a.iv. Energy division has been discussing the database with the IOUs since July and has been developing the database since March. Specific requirements and scope are addressed in responses to the other IOU questions.

1.a.v. RPS data is due on the same schedule as the PDSR, CHP/QF data pursuant to the settlement schedule, and Conventional data quarterly.

1.a.vi. Energy Division has stated that the first data request response will require real data, but that this data will be used for proof-of-concept and database testing. Future data requests will require live, accurate, and complete data.

1.a.vii. Energy Division staff has already attained management approval, as indicated by the letter from the Energy Division director. Requirements for the underlying data have been previously memorialized by Commission direction <INCLUDE LIST>. For conventional data, this request memorializes the previous data requests made by Energy Division in 2010 and 2011.

2) What generation resources will be included?

- a. Conventional contracts?
- b. Renewable contracts?
- c. Utility-owned generation?

2.a. Resource contracts of 1 year or more in duration not included in items 2b and 2c. This includes any resources not covered by the PDSR or item 2.d

2.b Renewable contracts pursuant to the requirements of the PDSR.

2.c All UOG operational during the time period covered by the data request.

2.d Combined Heat and Power & Qualifying Facilities.

- 3) What specific data, about each generation resource, will be required?
- a. What will be the process for determining which information will be required?
 - b. Will the information required to be provided be limited to what each IOU knows by contractual right or otherwise publicly available data?
 - c. What is the time period for reporting (*i.e.*, will historical data be required)?
 - d. How do we ensure that the right data is requested from the start?
 - e. If after initial use, further data categories are required, what is the anticipated process for adding such to the required report/database?
 - f. As responsibility for reporting generation resource information changes (due to new contractual relationships), what is the process for changing reporting requirements?

3.a The process for determining information has been previously required by Commission decisions, as indicated in the response to 1.a.viii. For conventional data, Energy Division data requests, developed jointly with the IOUs established the information criteria.

3.b. Information provided by the IOUs is expected to conform to Commission decisions and requirements. The Energy Division believes the data requested is part of what the IOU should have available as part of its normal operations. To the extent the information is not currently available the IOUs should seek to obtain the data, through contractual rights if necessary. To the extent that any specific data point is problematic the IOU should discuss this with the Energy Division

3.c. Historical data will be required back to 2004.

3.d See response to 3.a. Additionally, Energy Division staff has been working with the IOUs since July on adjustments and clarifications to the master object sheet tab in the database reporting template. Any process should be organic and able to adapt.

3.e. A process similar to that already conducted, to the extent the information change is not required elsewhere by the Commission, wherein a field is proposed and defined and discussed within a suitably rapid timeframe is appropriate.

3.f. As information sources change, Energy Division staff expects that the IOUs would raise any issues with staff prior to the data filing so that the most accurate and complete filing is possible. However, Energy Division staff expects that the IOUs will do their utmost to meet any data reporting requirements established by the Commission or with Energy Division staff.

- 4) Will this information be provided to the Commission by a report or data entry into a database via a data request?
- a. If report, how will this requirement be formalized via Commission approval?
 - b. If database, who at Energy Division will own, manage, and maintain the database?
 - c. If database, who will develop the database application (a.k.a. the front end)?

4.a. The database is not a report. To the extent that data is drawn from a report, the data would comply with the previous Commission approvals.

4.b. Energy Division staff will own, manage, and maintain the database. Currently this primary staff are Donald Brooks, Nathaniel Skinner, and Cem Turhal.

4.c. The database application is being developed by Energy Division staff with the support and approval of the Commission's IT department.

- 5) How often will this information need to be provided?
- a. If report, how often will a report be required?
 - b. If database, how often will data need to be entered?
 - c. How will the timing of the updates tie into existing reporting requirements?
 - d. Which updates/meetings/reports will this report/database replace?
 - i. For existing Commission-required updates/meetings/reports, what is the process for formalizing such replacement through Commission approval?
 - e. Each update would require significant validation and signoff. Increasing the frequency means either proportionally increased validation or decreased review and data quality

5.a. For information drawn from reports, such as the PDSR, the data will be provided pursuant to that schedule.

5.b. See 5.a for reports. For data not required in a report or due pursuant to another schedule, quarterly updates are expected.

5.c. Updates will be on the same schedule as other required reports, see 5.a and 5.b.

5.d. At this time, the only data filing being replaced will be the Power Purchase Agreement data request, which is subsumed entirely by the data requested in the database. Energy Division staff envisions that the database will replace other reporting formats in the future.

5.e. There is no change in the requested data frequency. Energy Division staff further expects that the data validation provided by moving to this database will reduce the mistakes and errors in IOU filings and improve the data available to the Commission.

- 6) How will confidentiality be addressed?
- a. Will these reports/data request responses be filed confidentially, per the Confidentiality Matrix?
 - b. If reports, will the other IOUs now have access to these reports?
 - c. If database, who will have access to the data entries within the database?
 - d. Individual PPAs may have specific confidentiality provisions that require the IOU to get consent from the counterparty before providing information or require notification to the counterparty
 - e. Confidentiality is not just by column, as ED proposed in the draft database, but on a contract-by-contract basis (*e.g.*, based on number of years since COD)
 - f. If database, it will need controls to ensure that ED personnel are aware of which data are confidential, and have a mechanism to notify the IOUs if confidential data is disclosed
 - g. How/when will Energy Division be publishing the data? Who will it be made available to?

6.a. Energy Division expects that the IOUs would file confidential data under the Confidentiality Matrix as appropriate.

6.b. See response to 6.a.

6.c. For the interim period Energy Division staff would have access to the database.

6.d. Energy Division staff expects the IOUs to take all necessary steps to ensure the Commission is provided with the information requested.

6.e. To clarify, Energy Division staff expressed that for the sake of expediency in filing the initial data request and to assuage IOU concerns about the burden of filing detailed initial confidentiality lists, that entire columns could be labeled confidential. Subsequent data responses would have the individual items labeled confidential to the extent that the data is confidential and pursuant to the Confidentiality Matrix.

6.f. Energy Division staff is aware of the need to protect confidential data.

6.g. Energy Division intends to make publically available data available to the public in the future. The exact data and method has yet to be determined.

- 7) Redundancy of information (CPUC submittals as well as potential cross agencies requirements)
- a. The benefit of this project, to the IOUs, would come from decreased data requests and elimination of redundant reports. However, ED says that these reports will not go away initially. When and how does ED intend to lift the current reporting requirements that this report/database will replace?
 - b. If this project is implemented, the IOUs want to retain the ability to object to Data Requests if the requested data or analysis may be pulled from ED's database instead. IOUs should be able to refer to the database as the source of information instead of putting together a formal response

7.a. Most data for the database will require little to no additional work by the IOUs as it is already filed with the Commission. After the database is tested and fully operational, Energy Division and the IOUs will explore mechanisms in which the database may replace other reporting mechanisms or methods.

7.b. Energy Division itself provided the recommendation that once the database is established the benefit would be the ability for staff to refer to the database. However, some projects may require more up to date information than is available in the database and Energy Division expects that the IOUs would comply with Commission and Energy Division data requests.

8) Internal governance structure (quality control)

- a. IOUs will need to establish change control over data to minimize amount of review needed

8.a. Energy Division is encouraged that the IOUs will continue to develop and refine mechanisms to provide the best quality data to the Commission via the Database.

9) Availability of Data

- a. Not all inputs in the object sheet are readily available
 - i. What are the limits of responsibility for the IOUs to provide data that is the responsibility of third parties (CAISO, CEC, etc)?

9.a. Energy Division expects that the IOUs will provide the data requested in the data request and data request template xls. To the extent that data can be drawn directly from the currently identified authoritative sources, Energy Division staff has already incorporated this into the data request template. Energy Division staff, however, welcomes the opportunity in subsequent data requests to find ways to better utilize authoritative data sources and is already conducting outreach with the CEC and CAISO.

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