

From: Jacobson, Erik B (RegRel)
Sent: 12/10/2013 10:33:37 AM
To: Kahlon, Gurbux (gurbux.kahlon@cpuc.ca.gov) (gurbux.kahlon@cpuc.ca.gov)
Cc:
Bcc:
Subject: Inadvertent release of usage information for one customer

Gurbux,

I tried to reach you last week and yesterday by phone to discuss an error by an employee who provided some gas use data for a PG&E customer to several external and internal individuals without prior customer approval. I wanted to get your opinion regarding what steps PG&E should take to alert the Commission to this issue. Since we have been unable to connect by phone, I am providing you some background information regarding this incident by email.

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Background

On September 18, 2013 at 4:38 p.m., a PG&E utility employee in the Energy Solutions & Service (ES&S) department mistakenly emailed customer gas usage information to representatives of three external parties while attempting to provide explanatory information on Total Flow Gas instruments and the impacts of planned gas metering changes. The email had the following subject line: "Total Flow Gas Meter Usage Reporting Fix." Attached to that email was a PG&E training presentation for PG&E account representatives entitled, "Gas Meter Billing Issue: Midnight to Midnight vs. 1:00 AM to 1:00 AM." The attachment was intended only for internal use and contained screen shots of PG&E systems showing customer-specific gas usage information (daily gas deliveries for the month of April 2013 and hourly usage information for April 30, 2013) as a training example that should not have been released to other PG&E customers.

After being made aware of the error, PG&E's employee attempted to "recall" the email on September 19, 2013 at 8:02 a.m. Because it was unclear to what extent the recall was successful, on September 20, 2013 at 4:32 p.m., PG&E's employee sent an email to the recipients requesting that they delete all copies of the email and communicate the request to any others who may have been forwarded a copy of the email.

PG&E also notified its customer of the privacy breach. On September 20, PG&E called the customer to inform it that gas usage information had been inadvertently released to third parties. PG&E apologized for the error and later sent an email on September 23, 2013 with a full description of the data and the identity of the third parties. PG&E's customer reviewed the data, appreciated the actions taken by the Company and concluded that the data was inconsequential to their operations.

PG&E will be including this privacy breach in its Smart Grid Annual Privacy Report, to be filed by April 30, 2014.

Gas Rule 26

Also on September 18, 2013 at 5:01 p.m., PG&E's ES&S employee emailed the same presentation containing customer-specific gas usage information to an internal group that included two PG&E Electric Gas Supply team members. This email disclosure raises a related issue regarding Gas Rule 26, which requires in part that: "PG&E may not disclose non-public Customer-specific information to intracompany departments without the Customer's permission, except to the extent necessary to provide gas or distribution service to the Customer." However, one team member deleted the email before opening it after being advised of the issue. The other team member opened the email and scanned it, but was not aware of the identity of the customer. Further, the second team member did not review the customer-specific information in detail or use or act upon the information in any way. He planned to review the email in more detail at a later time but deleted it after being advised of the issue.

Corrective Measures Taken

PG&E has implemented the following measures to help ensure that it is not repeated in the future:

- Conducted data breach training with Energy Solutions & Service (ES&S) leadership team;

- [REDACTED] Developed a 5 Minute Meeting document and communicated the 5 Minute Meeting to all ES&S employees;
- [REDACTED] Distributed the 5 Minute Meeting to PG&E's extended leadership team via an internal communications letter requesting them to share the contents of the 5 Minute Meeting with their respective team members;
- [REDACTED] Instituted an ES&S policy to exclude customer-specific data from any internal or external training documents and presentations; and
- [REDACTED] Adjusted annual compliance training schedule to include mandatory Data Security/Data Breach training

We apologize for this error and believe these corrective actions will address the problem on a going forward basis.

Please give me a call at your convenience so we can discuss further.

Thanks,

Erik