

From: Jacobson, Erik B (RegRel)
Sent: 4/1/2014 8:57:25 AM
To: rgf@cpuc.ca.gov (rgf@cpuc.ca.gov)
Cc: Allen, Meredith (/O=PG&E/OU=Corporate/cn=Recipients/cn=MEAE)
Bcc:
Subject: Background information for today's discussion on RAM maps

Ray,

We wanted to share some background information with you in advance of today's 10:30 meeting to discuss PG&E's security concerns associated with the Renewable Auction Mechanism (RAM) map issue. Meredith is on vacation this week, so I'm following up on her behalf.

PG&E and other IOUs are required under RAM and the PV program decisions to provide on their website a map of their electric transmission and distribution system indicating the available interconnection capacity of circuits and substations. The purpose of the map is to allow independent generators, governmental agencies, and other members of the public to identify preferred areas for interconnection of distributed renewable generation resources.

PG&E complied with these requirements several years ago by creating a Google Earth-based map that uses GIS data. Users are required to register a name and email address and disclaimers are provided on the website regarding limitations of the data. Users are also required to accept PG&E's standard website terms of use, which limits the users' right to use and distribute the data. Below is a link to this map on PG&E's website:

<http://www.pge.com/b2b/energysupply/wholesaleelectricssolicitation/PVRFO/pvmap/>

In the latter half of 2013, the CPUC's Energy Division requested that the IOUs revise their RAM/PV maps to allow the public to download the GIS data underlying the maps and to remove any requirement that a user agree to limit his/her use of the data. PG&E has two major concerns with making this sensitive data downloadable. First, allowing the public to download detailed information about PG&E's distribution and transmission system will reduce the security of the electric grid and make it much easier for a party to disrupt service to our

customers. Second, the data may be used by members of the public for unintended purposes for which the data is not suited, such as to locate facilities prior to excavation which could result in damage to our underground infrastructure and impact service.

We look forward to discussing these concerns with you further this morning.

Best regards,

Erik