

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 24, 2020

TO: PARTIES TO PHYSICAL SECURITY PROCEEDING

Service List: R.15-06-009

**IMPLEMENTATION OF INTERIM TRIAL PROCEDURES FOR EXCHANGE OF
HIGHLY-SENSITIVE INFORMATION PERTAINING TO THE PHYSICAL
SECURITY OF ELECTRIC UTILITY ASSETS**

This letter, as enabled by Ordering Paragraph (OP) 8 of Decision (D.)19-01-018, activates an Interim Trial Procedures (ITPs) for utility compliance with rules surrounding certain reports addressing physical security. The ITPs as set out here are a ministerial change to the process for Commission review of certain investor-owned utility (IOU) physical security plan requirements. Additionally, in the event that the Commission serves on any electric utility a data request, whose contents an electrical corporation deems to be highly-sensitive, the ITPs would facilitate such exchange of data.

On January 10, 2020, Southern California Edison (SCE), Pacific Gas and Electric Company (PG&E), and San Diego Gas and Electric Company (SDG&E) (collectively “joint IOUs”) filed a Petition for Modification (PFM) to amend D.19-01-018. The PFM seeks relief from the CPUC requirement that the Commission serve as permanent custodian for certain IOU physical security plans, explaining:

“By requiring utilities to send their physical security plans directly to the Commission, the CPUC becomes the de facto target for hackers seeking physical security roadmaps for every jurisdictional entity in the state.” In turn, a potential well-executed and successful cyber attack on the CPUC resulting in certain information falling into the hands of malicious actors “could render the grid vulnerable”. Therefore, the joint IOUs “urge the Commission to recognize the benefits of keeping that information stored in separate locations.”

The Commission’s Safety Policy Division (SPD) proposes the ITPs in order to allow for Commission staff review of documents for which the IOUs are likely to seek a heightened level of confidential treatment because their contents address utility physical security plans, programs, incidents, and other highly-sensitive matters.

Consistent with OP 9 of D.19-01-018, SPD staff has conferred with the utilities on the proposed procedure.

The ITPs are anticipated to be needed at least until Commission staff receives and reviews the major utility deliverables required by D.19-01-018. The ITPs shall remain in effect until further notice, termination, or modification by the Commission or by the Safety Policy Division Director.

/s/ RACHEL PETERSON

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Attachment A: Interim Trial Procedures (ITPs)