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April 30, 2015

Timothy Sullivan
Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Re: D.11-07-056 Rules Regarding Privacy and Security Protections for Energy Data Usage

Dear Mr. Sullivan:

Southern California Edison Company submits the attached Annual Privacy Report to you as required by Ordering Paragraph No. 3 of D.11-07-056. In accordance with D.11-07-056, this report notifies the Commission of:

- The number of demands received for disclosure of customer data pursuant to legal process or pursuant to situations of imminent threat to life or property (Rule 4(c)(6))
- The number of customers whose records were disclosed (related to demands received for disclosure of customer data pursuant to situations of imminent threat to life or property) (Rule 4(c)(6))
- Summary of reported privacy breaches affecting 1,000 or more customers (Rule 8(b))
- Annual report of all breaches within the calendar year affecting Covered Information, whether by the covered electrical corporation or by a third party (Rule 8(c))
- The number of authorized third parties accessing Covered Information (Rule 9(e)(1))
- The number of non-compliances with the Privacy Rules or with contractual provisions required by the Privacy Rules which become known to SCE through its daily operations. (Rule 9(e)(2))
- The number of customers affected by each non-compliance (Rule 9(e)(2))
- Detailed description of each non-compliance (Rule 9(e)(2))

Should you have any questions regarding this report, please contact James P. Scott Shotwell at 626-302-2038.

Best regards,

/s/ J.P. Shotwell
James P. Scott Shotwell
Director, Compliance, Policies &
Information Governance

JPSS: kcp
Enclosure

Cc: Edward Randolph
Director, CPUC Energy Division

SOUTHERN CALIFORNIA EDISON ANNUAL PRIVACY REPORT

2014

APRIL 30, 2015

SMART GRID TECHNOLOGIES
ORDER INSTITUTING RULEMAKING 08-12-009
CALIFORNIA PUBLIC UTILITIES COMMISSION

SCE ANNUAL PRIVACY REPORT – 2014

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I. Introduction

On July 29, 2011, the California Public Utilities Commission (“Commission”) issued Decision (D.) 11-07-056, *Decision Adopting Rules to Protect the Privacy and Security of the Electricity Usage Data of the Customers of Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company*, which requires the submission of an annual privacy report regarding Covered Information for electrical corporations. As clarified in Decision (D.) 14-12-004, issued on December 12, 2014, Ordering Paragraph (OP) 3 states: “Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company must each submit annual privacy reports to the Executive Director, commencing with calendar year 2012, no later than 120 days after the end of the calendar year. These annual reports must contain the information required to be reported annually by Rule 8(c) of the Rules Regarding Privacy and Security Protections for Energy Usage Data in Attachment D of this decision.”

On August 31, 2012, the Commission issued D.12-08-045, *Decision Extending Privacy Protections to Customers of Gas Corporations and Community Choice Aggregators, and to Residential and Small Commercial Customers of Electric Service Providers*, which does not apply to Southern California Edison.

Definitions:

“Covered Entity” is (1) any electrical corporation, or any third party that provides services to an electrical corporation under contract, (2) any third party who accesses, collects, stores, uses or discloses covered information pursuant to an order of the Commission, unless specifically exempted, who obtains this information from an electrical corporation, or (3) any third party, when authorized by the customer, that accesses, collects, stores, uses, or discloses covered information relating to 11 or more customers who obtains this information from an electrical corporation.

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“Covered Information” is any usage information obtained through the use of the capabilities of Advanced Metering Infrastructure (interval usage data^a) when associated with any information that can reasonably be used to identify an individual, family, household, residence, or non-residential customer. Covered Information does not include usage information from which identifying information has been removed such that an individual, family, household or residence, or non-residential customer cannot reasonably be identified or re-identified and does not include information provided to the Commission pursuant to its oversight responsibilities.^b

The scope of this report includes Covered Information only. “Customer Data” referenced in Rule 4(c)(6) is defined as “covered information” for the purposes of the Annual Privacy Report.

“Primary Purposes” The “primary purposes” for the collection, storage, use or disclosure of covered information are to—

- (1) provide or bill for electrical power,
- (2) provide for system, grid, or operational needs,
- (3) provide services as required by state or federal law or as specifically authorized by an order of the Commission, or
- (4) plan, implement, or evaluate demand response, energy management, or energy efficiency programs under contract with an electrical corporation, under contract with the Commission, or as part of a Commission authorized program conducted by a governmental entity under the supervision of the Commission.

“Secondary Purposes” “Secondary purpose” means any purpose that is not a primary purpose.

Pursuant to OP 3 of D.11-07-056, Southern California Edison (SCE) hereby submits its annual privacy report.

^a Electrical usage data obtained through the Advanced Metering Infrastructure listed in less than monthly increments (e.g. 15-minute or hourly).

^b See D.11-07-056, Conclusions of Law 9, pp. 150-151, and Attachment D, p. 1.

II. Privacy Report Requirements of D.11-07-056

Attachment D of D.11-07-056, *Rules Regarding Privacy and Security Protections for Energy Usage Data* (“Privacy Rules”), set forth the following rules, which are relevant to SCE’s annual privacy report:

4(c)(6) On an annual basis, covered entities shall report to the Commission the number of demands received for disclosure of customer data^c pursuant to legal process or pursuant to situations of imminent threat to life or property and the number of customers whose records were disclosed. Upon request of the Commission, covered entities shall report additional information to the Commission on such disclosures. The Commission may make such reports publicly available without identifying the affected customers, unless making such reports public is prohibited by state or federal law or by order of the Commission.

8(b) Notification of Breach. A covered third party shall notify the covered electrical corporation that is the source of the covered data within one week of the detection of a breach. Upon a breach affecting 1,000 or more customers, whether by a covered electrical corporation or by a covered third party, the covered electrical corporation shall notify the Commission’s Executive Director of security breaches of Covered Information within two weeks of the detection of a breach or within one week of notification by a covered third party of such a breach. Upon request by the Commission, electrical corporations shall notify the Commission’s Executive Director of security breaches of Covered Information.

8(c) Annual Report of Breaches. In addition, electrical corporations shall file an annual report with the Commission’s Executive Director, commencing with the calendar year 2012, that is due within 120 days of the end of the calendar year and notifies the Commission of all security breaches within the calendar year affecting Covered Information, whether by the covered electrical corporation or by a third party.

^c For the purposes of this Annual Privacy Report, the IOUs define “customer data” as “covered information.”

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9(e) Reporting Requirements. On an annual basis, each electrical corporation shall disclose to the Commission as part of an annual report required by Rule 8.c, the following information:

- (1) the number of authorized third parties accessing Covered Information,
- (2) the number of non-compliances with this rule or with contractual provisions required by this rule experienced by the utility, and the number of customers affected by each non-compliance and a detailed description of each non-compliance.

This report addresses each of these rules, as described below.

III. 2014 Annual Privacy Report Results

Table 1. SCE's Annual Privacy Report for 2014

Rule	Description	Response
Rule 4(c)(6)	The number of demands received for disclosure of customer data pursuant to legal process or pursuant to situations of imminent threat to life or property	<ul style="list-style-type: none"> • Legal process: 0 • Imminent threat: 0
Rule 4(c)(6)	The number of customers whose records were disclosed (related to demands received for disclosure of customer data pursuant to legal process or pursuant to situations of imminent threat to life or property)	<ul style="list-style-type: none"> • Legal process: 0 • Imminent threat: 0
Rule 8(b)	Summary of reported privacy breaches affecting 1,000 or more customers	<ul style="list-style-type: none"> • 0
Rule 8(c)	Annual report of all breaches within the calendar year affecting Covered Information, whether by the covered electrical corporation or by a third party	<ul style="list-style-type: none"> • 0
Rule 9(e)(1)	The number of authorized third parties accessing Covered Information (Includes suppliers/contractors/vendors under contract with IOU, customer-authorized researchers or governmental requests, and customer-authorized third parties. Count does include customer-authorized transactions, such as CISR.)	<ul style="list-style-type: none"> • Customer Authorized (CISR): 132^d • Vendors Under Contract: 9
Rule 9(e)(2)	The number of non-compliances with the Privacy Rules or with contractual provisions required by the Privacy Rules which become known to SCE through its daily operations	<ul style="list-style-type: none"> • 0
Rule 9(e)(2)	The number of customers affected by each non-compliance	<ul style="list-style-type: none"> • 0
Rule 9(e)(2)	Detailed description of each non-compliance	<ul style="list-style-type: none"> • 0

^d Represents the total number of unique customer authorized third parties receiving Covered Information from Option 5 on the CISR form.