

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Consider
Smart Grid Technologies Pursuant to
Federal Legislation and on the
Commission's own Motion to Actively
Guide Policy in California's Development of
a Smart Grid System.
Rulemaking 08-12-009

Rulemaking 08-12-009
(Filed December 18, 2008)

**DEMAND RESPONSE AND SMART GRID COALITION (DRSG)
REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING
COMMENTS ON PROPOSED INTERIM METRICS TO MEASURE PROGRESS BY
PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON
COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY IN IMPLEMENTING A
SMART GRID**

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Dated: February 14, 2011

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SMART GRID**

In accordance with ALJ Sullivan’s ruling of December 29, 2010 in the above-captioned proceeding, the Demand Response and Smart Grid Coalition (“DRSG”) respectfully submits these reply comments on the proposed interim smart grid metrics.

Like the majority of parties filing comments, the DRSG supports the adoption of the consensus interim smart grid metrics proposed by the Pacific Gas & Electric, San Diego Gas & Electric, and Southern California Edison companies.

However, DRSG proposes that metric number A-9 in the consensus metrics¹ be amended to state, “Number and percentage of customers with advanced meters using a utility- or authorized third-party administered internet or web-based portal to access energy usage information or a utility-authorized internet or web-based portal to enroll in utility energy information programs.” The purpose of the metrics is to monitor progress of the smart grid and compliance with Commission directives regarding its implementation. In D.09-12-046 in this

¹ - ALJ ruling at 22.

proceeding (R.08-12-009), the Commission imposed a requirement that utilities allow customers to access their data through customer-authorized third parties, with appropriate and necessary protections for data security and privacy.² Accordingly, to monitor progress in implementation of this Commission requirement, it is necessary that the smart grid metrics include tracking of customers accessing their data through third parties. Also, because the requirement is already effective, including it in the interim smart grid metrics is appropriate.

The DRSG appreciates the opportunity to comment.

Respectfully submitted this 14th day of February, 2011,

/s/ Dan Delurey

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² - D.09-12-046 at 3: "Given the importance of ensuring customer access to usage information we will set a deadline by which utilities must provide access to authorized third parties. We will require that by the end of 2010, the utilities will have put into place operations that allow customers to access their information easily through an agreement with a third party, provided sufficient privacy and security measures are in place to mitigate the potential for fraud and hacking. We intend to develop and adopt necessary rules and policies related to authorized third party access to usage data during the next phase of this proceeding. Thus, the access to usage data must be provided consistent with the rules we adopt to ensure that access is provided consistent with EISA, the general public interest, and state privacy rules."

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of DEMAND RESPONSE AND SMART GRID COALITION (DRSG) REPLY COMMENTS ON ADMINISTRATIVE LAW JUDGE'S RULING SEEKING COMMENTS ON PROPOSED INTERIM METRICS TO MEASURE PROGRESS BY PACIFIC GAS AND ELECTRIC COMPANY, SOUTHERN CALIFORNIA EDISON COMPANY AND SAN DIEGO GAS & ELECTRIC COMPANY IN IMPLEMENTING A SMART GRID on all parties identified on the attached official service list for Proceeding: R08-12-009. Service was completed by serving an electronic copy on their email address of record, and by mailing paper copies to parties without email addresses.

Executed on February 14, 2011 at Washington, D.C.

/s/ Dan Delurey

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