

**Informal Comments of San Diego Gas and Electric Company
On September 30, 2016, CPUC Energy Division Proposal for Re-scoping
Track 1 Data Access Issues
Distribution Resources Plan, R.14-08-013
October 7, 2016**

Summary

SDG&E appreciates the CPUC Energy Division's update on the proposed scope of data access issues in the Distribution Resources Plan proceeding (DRP), R.14-08-013, *et al.* SDG&E understands CPUC Energy Division's desire to make publicly available data more user friendly and accessible, and believes that steps can be taken to accomplish this goal. SDG&E continues to believe that identifying use cases is key to identify specific data needs and the tools that are appropriate for generating and disseminating the large amount of data developed in the DRP and IDER proceedings. SDG&E also believes that leveraging existing online tools will accomplish goals regarding data access without requiring new IT investments to integrate existing tools within a single portal. With this in mind, SDG&E has specific recommendations for how to improve the access to DRP data

Specific Suggestions Regarding Data Accessibility

During the DRP working group meeting on September 30, 2016, CPUC Energy Division provided a data access presentation that listed several existing data types relevant to the DPR and IDER proceedings, and which suggested establishing an "IOU Data Access Portal." SDG&E agrees that making this data more accessible is key to getting the most from the data. However, most of these existing data types are already publicly accessible at various IOU or CPUC website links. While it seems natural to put all this data in one location, SDG&E does not recommend creation of a new, website "portal" for these data types. To stand up such a portal would require significant investments in IT infrastructure and accompanying security measures. A more streamlined approach would be to provide a single webpage where links to the various databases currently exist online. This would in effect provide the "one stop shop" that the proposed portal seeks to accomplish, without any extensive investment. For new data types that may be created in various proceedings, they can be added to existing databases where feasible, or links to new databases added to the new one stop webpage.

SDG&E also agrees with CPUC Energy Division that data types should be standardized across utilities and third parties to the extent feasible. Where data can be output to a standardized format, it should be. In some cases, the tools used may preclude the use of a standardized format, in which case an alternative format should be agreed upon.

Conclusion

The creation, management, and dissemination of data across the many proceedings addressing DER issues are not small tasks. The amount of data generated will be immense, and of varying degrees of value to each party. While SDG&E agrees that efforts should be taken to make public data more accessible, SDG&E believes that a stand-alone “portal” is not the correct solution. Each database will have its own IT requirements, and incorporating these data into a single platform will be an expensive and time consuming endeavor. Instead, having a “one stop” webpage that contains links to the various databases will accomplish the goals set forth by CPUC Energy Division without the investment required to create a new data portal that duplicates the efforts of existing online data access tools.