ITEM NO. 2

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: August 13, 2019

REGULAR X CONSENT ____ EFFECTIVE DATE N/A

DATE: August 5, 2019

TO: Public Utility Commission

FROM: Brittany Andrus

THROUGH: Jason Eisdorfer and JP Batmale **SIGNED**

SUBJECT: OREGON PUBLIC UTILITY COMMISSION STAFF:
(Docket No. UM 2000) Staff Report and Recommendation on Handling and Publication of Sensitive Interconnection-related Data.

STAFF RECOMMENDATION:

The Commission should approve each utility posting interconnection data on September 1, 2019, that includes fields identifying substation SCADA capability, and peak load data for each feeder to the extent that data does not represent a single customer.

The Commission should also direct Staff to examine additional issues regarding the handling and publication of sensitive distribution system interconnection data in the interconnection data workgroup (Workgroup), with Staff recommendations to follow in the summary report to the Commission no later than January 2020.

DISCUSSION:

Issue

Whether the Commission should adopt the Staff proposal to resolve issues related to publication of potentially sensitive interconnection data.

Applicable Rule or Order

In Order No. 19-217 the Commission directed Staff to "…provide a report back and recommendation on the handling and publication of sensitive data no later than the August 13, 2019 Public Meeting."[1]

Analysis

In its report to the Commission for the June 18, 2019 Public Meeting, Staff put forth its proposal for interconnection data transparency.[2] The proposal included specific substation and distribution feeder data, as well as the establishment of a short-term interconnection data workgroup consisting of utilities, Staff and developers.

Staff's proposal for data elements in the distribution system information to be published by September 1, 2019, included the following:[3]

- Each utility will compile the distribution system data below and make it publicly available on its OASIS website by September 1, 2019:
    - For each substation:
        - Name
        - Approximate location/County
        - Substation Voltage
        - Number of transformers
        - Transformer voltages
        - Communications – SCADA Y/N
    - For each feeder:
        - Identifier
        - Peak load
        - Line capacity at the point where it leaves the substation

In that report, Staff summarized stakeholder comments on the proposal, including the following:

[1] Order No. 19-217, p. 2.
[2] Adopted with changes by Order No. 19-217,
[3] The Staff draft proposal included "Communications" for each substation; this was changed to the more specific "Communications - SCADA Y/N," based on discussions at the second workshop.

> PGE is willing to provide its Oregon jurisdictional interconnection queue by July 1, 2019, and to post interconnection study reports back to 2017 and on an ongoing basis on its OASIS website by the end of 2019, redacted for certain information including Critical Infrastructure Protection (CIP)[4] or Critical Energy/Electric Infrastructure Information (CEII)[5,6] PGE opposes posting pre-2017 interconnection study reports. PGE does not object to much of Staff's proposal regarding posting system data, but does object to posting facility communications information and loading information for all feeders because it could be CEII, and objects to providing information regarding daytime minimum load because it would be burdensome to do so.[7]

PGE reiterated these concerns at the June 18, 2019 public meeting. In the order adopting the Staff recommendation with changes, the Commission requested that the workgroup "review concerns expressed at the June 18, 2019 Public Meeting about the publication of some potentially sensitive data," and required Staff to "report back to us no later than the August 13, 2019 Public Meeting with a report and recommendation on the data sensitivity question."[8]

At the initial Workgroup meeting on July 10, 2019, PGE provided an update on the two data elements they discussed at the June 18, 2019 public meeting:

1) Feeder: Peak load; and,
2) Substation: Communications – SCADA Y/N

PGE indicated that security concerns with providing SCADA and peak load information for feeders had been resolved for the most part. After further analysis, PGE concluded that the SCADA concern affects a smaller number of substations than originally presumed, and no significant reason for confidentiality was identified for this data element. For peak load information, PGE intends to provide the information for all feeders; however, certain dedicated feeders (approximately ten percent of the distribution feeders) serving single customers may need redaction if they appear to reveal customer-specific information.

PacifiCorp and Idaho Power indicated that they may also have a need to redact a small number of feeders for similar reasons, but that for their respective systems, it would be for less than the ten percent estimated for PGE. Each of the three utilities agreed to

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[4] Critical Infrastructure Protection reliability standards, approved by FERC.
[5] Critical Energy/Electric Infrastructure Information (CEII) Regulations, established by FERC.
[6] PGE Comments on Staff's Proposal for Interconnection Data Transparency (June 3, 2019).
[7] Id., pp. 2-3.
[8] Order No. 19-217, p. 1.

bring examples of a data table for distribution system information, redacted and un-redacted, to the next Workgroup meeting for discussion.

The Workgroup has discussed other substation communications information that would be useful for project developers during initial scoping processes, and the developer representatives plan to bring a targeted request to the next meeting.

The next Workgroup meeting is scheduled for August 15, 2019. Workgroup members will review the data table examples at the next meeting, and the full data set is to be posted on September 1, 2019.

Conclusion

Based on the revised information provided by PGE, Staff believes that the data sensitivity concerns regarding substations with SCADA capability and maximum feeder load have been resolved satisfactorily. Any further Workgroup proposals for adding data on distribution system communications capabilities, or other data, will be assessed for data sensitivity concerns and recommendations brought to the Commission in January 2020.

PROPOSED COMMISSION MOTION:

Approve each utility posting interconnection data on September 1, 2019, that includes fields identifying substation SCADA capability and peak load data for each feeder to the extent that data does not represent a single customer.

Direct Staff to report on any additional issues regarding the handling and publication of sensitive distribution system interconnection data no later than January 2020.