

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

| | | |
|---|---|---------------------------|
| Order Instituting Rulemaking on the |) | |
| Commission's Own Motion to Determine |) | |
| Whether Sharing of Customer Information |) | Rulemaking 09-12-017 |
| Between Regulated Water Utilities and |) | (Filed December 17, 2009) |
| Regulated Energy Utilities/Municipal |) | |
| Energy Providers Should be Required; |) | |
| and if so, to Develop the Rules and |) | |
| Procedures Governing Such Sharing. |) | |
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**COMMENTS OF CALIFORNIA WATER ASSOCIATION
ON PROPOSED DECISION OF
PRESIDENT PEEVEY ON
SHARING OF CUSTOMER INFORMATION**

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In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “Commission”), California Water Association (“CWA”) hereby submits these comments on the Proposed Decision of President Michael R. Peevey (the “Proposed Decision” or “PD”) in the above-captioned rulemaking proceeding (the “Rulemaking”). CWA appreciates the manner in which President Peevey and Administrative Law Judge (“ALJ”) Janice Grau have attempted to resolve the issues in this proceeding. The PD reflects an appropriate consideration of the constraints faced by the water utilities, and the necessary distinctions between the water and energy utilities with respect to customer information.

I. Introduction and Summary of Comments

CWA is a statewide association that represents the interests of investor-owned water utilities regulated by the Commission, including especially the Respondent Class A and Class B water utilities that are the subject of this Rulemaking (collectively, the “Water Companies”).¹

The Proposed Decision would implement a low-income customer data-sharing program between the Class A and B water utilities and the regulated energy utilities using the Guidelines for Sharing (Attachment 1). The Proposed Decision would authorize the Water Companies to recover data-sharing implementation costs and would require an annual information-only filing in the form of the Low-Income Data Report (Attachment 2). The Proposed Decision further encourages the Water Companies to share customer information with municipal utilities and to collaborate on outreach with the energy utilities.

In accordance with the schedule set by ALJ Grau’s April 1, 2010, Scoping Memo and January 18, 2011 Ruling Requesting Comments, CWA filed Opening Comments and Comments on the Ruling on April 23, 2010, and February 1, 2011, respectively. CWA’s comments raised certain practical concerns for clarifying and streamlining the various information-sharing proposals and the attendant reporting and cost-recovery requirements. CWA also explained that penetration rates for the water utilities will not rise to the levels achieved by the energy utilities due to master-metering, and that the success of the Water Companies in enrolling eligible low-income customers should not be evaluated by way of strict comparisons to other industries.

¹ CWA members Alisal Water Corporation (dba Alco Water Service) (U-206-W), Apple Valley Ranchos Water Company (U-346-W), California American Water Company (U-210-W), California Water Service Company (U-60-W), Del Oro Water Company (U-61-W), East Pasadena Water Company (U-331-W), Golden State Water Company (U-133-W), Great Oaks Water Company (U-162-W), Park Water Company (U-314-W), San Gabriel Valley Water Company (U-337-W), San Jose Water Company (U-168-W), Suburban Water Systems (U-339-W) and Valencia Water Company (U-342-W) join with CWA in submitting these comments.

These comments seek to build upon the effort to implement a proactive, yet practical, data-sharing program among the regulated energy and water utilities by: (1) recommending that mandatory data sharing by Class A and B water utilities be reserved for those districts that have 2,000 or more service connections; (2) considering the likely costs and efficacy of the proposed cost-recovery mechanism; (3) clarifying the role of Division of Water and Audits (“DWA”) in approving the proposed Data-Sharing Plan submitted by each water utility; (4) further refining the Guidelines for Sharing in order to ensure a uniform interpretation of the data-sharing requirements; and (5) making other important clarifications, as will be discussed in more detail below.

II. Water Utility Districts that Have Up to 2,000 Connections Should Be Encouraged, but Not Required, to Follow the Guidelines and Implement the Data-Sharing Plan.

As a preliminary matter, the PD is internally inconsistent with respect to which water utilities are required to comply with certain requirements, and clarification is needed. Ordering Paragraph No. 2 of the Proposed Decision requires all Class A and B water utilities with low-income assistance programs to adhere to the Guidelines for Sharing specified in Attachment 1 (the “Guidelines”). The Guidelines themselves require both Class A and Class B water utilities to develop and implement data-sharing plans. Several of the remaining ordering paragraphs, however, expressly apply only to the Class A water utilities – *e.g.* Ordering Paragraph Nos. 4, 5, 6 and 7 require the Class A water utilities to develop data-sharing plans and track associated costs in memorandum accounts. For purposes of providing comment below, CWA assumes that the PD proposes broader application of the data-sharing requirements to all Class A and B companies. Whatever the intended result, however, CWA believes that refinement of the PD’s

application should be adopted in the final decision and that, for the reasons stated below, uniform application to all Class A and B water companies is not appropriate.

The Proposed Decision concludes that customer information-sharing should be assessed on a case-by-case basis for the smaller water utilities, but declines to adopt a procedure for Class A and B water utilities to apply for an exemption from these requirements, as recommended by CWA. The PD cites the homogeneity of small water company service areas as one of the “many variables” that would make sharing “cost prohibitive” for the Class C and D water companies or would “serve no purpose.” The PD does not recognize, however, that certain of the same dynamics that complicate data-sharing for the Class C and D water companies apply in the context of Class A and B districts of the same size.

Data exchange is district-specific and energy partner-specific, which means that the administrative burden and cost to upgrade systems to manage data-sharing is also fairly district-specific. For example, Del Oro Water Company, a Class B water utility, has 18 districts ranging in size from 14 (East Plano District) to 4,896 (Paradise Pines District) service connections. As with the Class C and D water companies, it would be unreasonable to require such small districts to implement the PD’s requirements. Therefore, if the Commission is not willing to adopt a procedure for Class A and B water utilities to apply for a data-sharing exemption, the Commission should only encourage, but not require, water utility districts of the size comparable to the Class C and D companies (less than 2,000 service connections) to follow the Guidelines and implement the Data-Sharing Plan.

III. The Proposed Decision's Cost and Cost-Recovery Provisions are Confusing and Incomplete.

The Proposed Decision acknowledges that the water companies will incur (and pass on to ratepayers) reasonable one-time and ongoing costs to implement data sharing. However, the message regarding investment and cost recovery is mixed. The PD specifies that “[u]pdating of the utilities’ data systems should be avoided, if possible, and kept to a minimum, when necessary,” but also requires data-sharing to be both “efficient and cost effective.” (PD, at 21.)

These two statements are, to some degree, incompatible. An initial investment to update data systems will make for a more efficient data-sharing program, which will be more cost-effective over the longer term. The PD should be revised to eliminate the suggestion that updating systems or other specific functions is not a means to accomplish an efficient and cost-effective data-sharing program. As noted in the PD, the water company will bear the burden to show that recovery of costs tracked in a memorandum account is appropriate and reasonable.

Perhaps the mixed messages regarding cost and cost-effectiveness are attributable to a lack of information on the potential scale of the required investment to accomplish data sharing. In fact, the PD does not attempt to approximate or quantify the investment that will be required to fund the additional staff and technical resources each water company will need to comply with the Guidelines for Sharing and to implement its Data-Sharing Plan. Only after the decision in this proceeding is final does the PD contemplate that each water company will submit a description of additional resources, system requirements, estimated one-time costs and estimated ongoing costs. CWA feels compelled to provide the Commission with some context regarding costs.

The water companies anticipate investing in one-time information technology costs and ongoing costs to run the data at every data exchange, which does not include the cost of labor, materials, mailings or administrative costs incurred by other departments (e.g. inputting application data received through outreach to potential customers). Additionally, many of the water utilities subject to these requirements do not have a department or dedicated staff to oversee existing low-income assistance programs and would need to add one or more administrator(s) and temporary staff to assist in each data exchange and resulting outreach effort to potential customers, if any.²

Lastly, with respect to cost recovery, the PD does not respond to CWA's concern regarding timely recovery of costs associated with data-sharing. In its February 1, 2011 Comments on the Ruling, CWA urged the Commission to consider authorizing each water utility to establish a balancing account with an annual true-up to record low-income assistance-related discounts, surcharges, program costs and any additional costs incurred as a result of data-sharing efforts. The true-up is necessary in order to ensure timely recovery of costs and avoid the buildup of high account balances, and the PD should be revised to include a cost recovery mechanism consistent with CWA's proposal.

² Cal Water, for instance, estimates that, solely for the information technology activities needed to implement the PD's proposal, the start-up costs will be more than \$70,000, and will include the following activities: develop a web application that can receive and store CARE customers' names and addresses provided by energy companies; compare CARE customers' names and addresses to those in Cal Water's databases to identify "hard matches"; offer "opt-out" option to customers with "hard matches;" and customize customer database system to automatically enroll "hard match" customers who do not opt out.

IV. The Proposed Decision Should Be Revised to Clarify DWA’s Role With Respect To the Water Utilities’ Data-Sharing Plans.

Ordering Paragraph 5 provides that each water utility with a data-sharing plan “approved” through the process in Ordering Paragraph 4 must commence data-sharing within 60 days after filing the plan. (PD, at 42.) Ordering Paragraph 4 requires the water companies to file an information-only filing with a data-sharing plan containing the information enumerated therein. (PD, at 41-42.) As defined in Section 3.9 of General Order (“GO”) 96-B, an information-only filing is an “informal report, required by statute or Commission order, that is submitted by a utility to the Commission, but that is not submitted in connection with a request for Commission approval, authorization, or other relief.” The reviewing industry division may notify the utility of any omission or “other defect” in a filing, but approval is not required. (GO 96-B, Section 6.2.)

Therefore, Ordering Paragraph 5 should be corrected to delete the reference to an “approved” data-sharing plan and amended as set forth in Appendix A to reference the information-only submittal.

V. The Guidelines and Low-Income Data Report Should Be Refined To Ensure Uniform Interpretation of the Data-Sharing and Reporting Requirements.

(A) *Customer data, defined.*

In order to preserve customer privacy, the information shared by and between the regulated utilities should be narrowly tailored. The Guidelines define “customer data” as name, address, re-certification and random post-enrollment status, and other pertinent information to the provision of low-income assistance.” (Guidelines, No. 4.)

First, it is CWA’s understanding that “re-certification” information includes household size data received through recertification of low-income program participants. CWA

notes that, in order to comply with low-income reporting requirements adopted in the Phase 2 Conservation Investigation, I.07-01-022, sharing of household size data will be required. The definition of “customer data” should be modified to clarify that re-certification information includes household size data.

Second, the discussion in the PD supports the exchange of all types of customer information listed in Guideline No. 4 except for the catch-all category of “other pertinent information.” Nothing in the discussion suggests that other information might be required to administer a successful data-sharing program, and the circumstances under which “other pertinent information” might be shared are not specified. For the sake of transparency and certainty in the exchange of sensitive customer data, the definition of “customer data” should be amended to delete any “other pertinent information to the provision of low-income assistance.”

(B) *CARE Customers and “Metering Conditions”*

The Low-Income Data Report (Attachment 3) requires the Water Companies to report the “[n]umber of CARE customers ineligible for enrollment due to metering conditions (as compare with water utility records).” CWA objects to this data point as unworkable. Failure to find a match for a CARE customer does not, by default, mean that the individual user is living behind a master meter serviced by a Commission-regulated water utility. For example, a CARE customer living in the service area of a Commission-regulated water utility may, in fact, receive water service from a municipal supplier. Unless the energy companies are able to draw this distinction before a data exchange, the simple failure to match does not begin to serve as a fair proxy for CARE customers ineligible “due to metering conditions.” The Low-Income Data Report should be revised to eliminate this data point.

VI. Eligibility for Low-Income Assistance Should Be Based On Income Levels.

Eligibility for certain water company low-income assistance programs currently is not based solely on income levels. For example, to be eligible for Park Water Company's California Alternative Rates for Water ("CARW") program, a customer's meter size may be no larger than 1 inch. This means that after such a customer is "matched," automatic enrollment would still be conditioned upon meeting the meter size requirement. This is cumbersome and not necessary. The PD does not acknowledge that an energy customer eligible for CARE that is also a customer of the water company may not currently qualify for the water company's low-income assistance program due to limitations placed on eligibility based on meter size. To be effective and efficient, the PD's data-sharing program should be revised to remove the additional hurdle to automatic enrollment by requiring the water company to automatically enroll a customer where eligibility based on income is satisfied.

VII. The Proposed Decisions' Reflections on Existing State and Federal Law Governing Customer Notification Are Not Substantiated and Should Be Deleted From the Final Decision.

The Proposed Decision declines to adopt customer notification in the event of an unauthorized disclosure of customer names and addresses, reasoning that "[i]t is unlikely that the disclosure of names and addresses alone would constitute a disclosure of confidential information, because names and addresses generally are publicly available." (PD, at 23.) CWA agrees with the result and considers it unnecessary for the PD to impose a Commission-specific requirement to notify customers in the event of disclosure of confidential customer data. However, CWA is concerned by the reasoning expressed in the PD. Existing state and federal law governing security breaches involving personally identifiable consumer information dictate the circumstances under which a person or entity is required to notify individuals of data security

incidents involving their personal information. The PD should be revised to eliminate any unsubstantiated, or premature, conclusions regarding the circumstances under notification of unauthorized disclosure of customer information.

VIII. Conclusion

Throughout the course of this proceeding, CWA has been supportive of the adoption of reasonable procedures to exchange customer data among the regulated water and energy utilities. CWA is encouraged by the PD's measured response to the record but urges the Commission to consider narrowing the application of these rules, authorize a balancing account with an annual true-up to ensure timely recovery of reasonable costs and amend the Guidelines and Low-Income Data Report consistent with these comments.

Respectfully submitted,

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APPENDIX A

Findings of Fact

...

6. ~~MM~~ Master-metered households are precluded from participating in most water low-income assistance programs, because residents are not the customers of the water utility and so are not billed directly by the water utility for service.

...

29. The water utilities anticipate incurring one-time and ongoing costs to implement the data sharing program.

Conclusions of Law

1. The Guidelines for Sharing Low-Income Customer Information, attached to this decision as Attachment 1, are a reasonable response to the record and should be adopted for districts that have 2,000 or more service connections of Class A and B water utilities with low-income assistance programs.

...

5. It is reasonable to permit water utilities to track in ~~memorandum~~ balancing accounts with an annual true-up the one-time and ongoing expenses, not already covered in rates, for implementing low-income information sharing.

Ordering Paragraphs

...

2. All Class A and B water utilities with low-income assistance programs (Class A water utilities: Apple Valley Ranchos Water Company, California American Water Company, California Water Service Company, Golden State Water Company, Great Oaks Water Company, Park Water Company, San Gabriel Valley Water Company, San Jose Water Company, Suburban Water Systems, and Valencia Water Company; Class B water utilities: Alisal Water Corporation ([dba Alco Water Service](#)), Del Oro Water Company, East Pasadena Water Company and Fruitridge Vista Water Company) are subject to the guidelines adopted in Ordering Paragraph 1, [except that districts with fewer than 2,000 service connections are encouraged, but not required, to follow the guidelines](#). Class C and D water utilities with low-income assistance programs are encouraged to follow the guidelines.

...

5. Each Class A water [or B](#) utility with a ~~data-data~~-sharing plan ~~approved-submitted~~ through the process ordered in Ordering Paragraph 4 shall commence data sharing within 60 days after filing the plan.

6. Class A [or B](#) water utilities with existing memorandum accounts that include low-income assistance program costs may track one-time and ongoing ~~data-data~~-sharing costs not already included in rates in those accounts and shall identify those costs separately from other program costs.

7. Class A [or B](#) water utilities without ~~memorandum-balancing~~ accounts that include low-income assistance program costs [and have an annual true-up](#) may file a Tier 1 advice letter within 60 days of the issuance of this decision to establish a ~~memorandum-balancing~~ account [with an annual true-up](#) to track one-time and ongoing data sharing costs not already

included in rates. Once these [memorandum-balancing](#) accounts are established, the Class A [and B](#) water utilities may seek recovery of the expenses booked to their memorandum accounts in their next general rate case or by filing Tier 3 advice letters.

Attachment 1

Guidelines for Sharing Low-Income Customer Information

1. Class A and B regulated water utilities with low-income assistance programs shall develop a data sharing program [for districts of 2,000 service connections or more](#) and negotiate associated agreement(s) with regulated energy utilities in which the utilities share Customer Data of those customers enrolled in low-income assistance programs. Class C and D water utilities, [as well as Class A and B water utility districts of less than 2,000 service connections](#), are encouraged to develop such programs and the associated agreements.

...

4. Customer Data is defined as the name, address, re-certification [\(including household size information\)](#) and random post-enrollment status, ~~and other pertinent information to the provision of low-income assistance.~~

Attachment 3

Information-Only Low-Income Data Report

...

- ~~Number of CARE customer ineligible for enrollment due to metering conditions (as compared with water utility records).~~

...

CERTIFICATE OF SERVICE

I, Jeannie Wong, hereby certify that on this date I served the foregoing COMMENTS OF CALIFORNIA WATER ASSOCIATION ON PROPOSED DECISION OF PRESIDENT PEEVEY ON SHARING OF CUSTOMER INFORMATION by electronic mail and by hand delivery on the parties to R.09-12-017:

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Executed this 25th day of April, 2011 in San Francisco, California.

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