



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

Public Counsel

800 Fifth Ave • Suite 2000 • MS TB-14 • Seattle WA 98104-3188 • (206) 464-7744

January 2, 2020

VIA WEB PORTAL

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
Records Management
01/02/20 14:53
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Rulemaking to modify existing consumer protection and meter rules to include Advanced Metering Infrastructure, Docket U-180525

Dear Mr. Johnson:

Pursuant to the request of Administrative Law Judge Kopta made at the workshop held on December 19, 2019, please find attached documents regarding the use of aggregated and anonymized data to which Public Counsel cited in its initial comments filed in the above-entitled docket.¹ Public Counsel cited to the following items:

Decision 14-05-016 issued by the California Public Utilities Commission on May 5, 2014

- Full citation: *Order Instituting Rulemaking to Consider Smart Grid Technologies*, Rulemaking 08-12-009, Decision 14-05-016: Decision Adopting Rules to Provide Access to Energy Usage and Usage-Related Data While Protecting Privacy of Personal Data (Cal. Pub. Util. Comm'n May 5, 2014), <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M090/K845/90845985.PDF>.

U.S. Department of Energy, DataGuard Energy Data Privacy Program, Voluntary Code of Conduct, Final Concepts and Principles, issued on January 8, 2015.

- Full citation: U.S. Dep't of Energy, DATAGUARD ENERGY DATA PRIVACY PROGRAM, VOLUNTARY CODE OF CONDUCT, FINAL CONCEPTS AND PRINCIPLES (Jan. 8, 2015), <https://www.smartgrid.gov/files/DataGuard VCC Concepts and Principles 2015 01 08 FINAL.pdf>.

¹ See Initial Comments of Public Counsel, ¶¶ 17-23 (Sept. 7, 2018).

ATTORNEY GENERAL OF WASHINGTON

January 2, 2020

Page 2

Public Counsel does not necessarily endorse or support all approaches to data aggregation and anonymization presented in the attached documents but provides the information to assist with further discussion on the topic, as requested.

Sincerely,

/S/ Nina Suetake

NINA M. SUETAKE, WSBA No. 53574
Assistant Attorney General
Public Counsel Unit
(206) 389-2055

NMS/CM
Enclosure