ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: Southern California Edison	Date Utility Notified: August 29, 2014
Utility Number/Type: U 338-E	[X] E-Mailed to: Morgan, Darrah
Advice Letter Number(s) 3018-E	darrah.morgan@sce.com
Date AL(s) Filed) March 18, 2014	ED Staff Contact: J. David Erickson
Utility Contact Person: Natalie Martinez	ED Staff Email: je5@cpuc.ca.gov
Utility Phone No (626) 302-2086	ED Staff Phone No.: 415-703-1226

[] INITIAL SUSPENSION (up to 120 DAYS from the expiration of the initial review period)

This is to notify that the above-indicated AL is suspended for up to 120 days beginning April 17, 2014 for the following reason(s) below. If the AL requires a Commission resolution and the Commission's deliberation on the resolution prepared by Energy Division extends beyond the expiration of the initial suspension period, the advice letter will be automatically suspended for up to 180 days beyond the initial suspension period.

[ ] A Commission Resolution is Required to Dispose of the Advice Letter

[ ] Advice Letter Requests a Commission Order

[X] Advice Letter Requires Staff Review

The expected duration of initial suspension period is 120 days

[X] FURTHER SUSPENSION (up to 180 DAYS beyond initial suspension period)

The AL requires a further review by Energy Division. Initial review resulted in filing an amendment has extended beyond the expiration of the initial suspension period. The advice letter is suspended for up to 180 days beyond the initial suspension period.

If you have any questions regarding this matter, please contact J. David Erickson at je5@cpuc.ca.gov

cc:
EDTariffUnit
Arthur O'Donnell

* Note: reference – Decision D.02-02-049, dated February 21, 2002, and Rule 7.5 in appendix A of D.O7-01-024

ADVICE LETTER (AL) SUSPENSION NOTICE
ENERGY DIVISION

Utility Name: Southern California Edison
Utility No./Type: U 338-E
Advice Letter Nos.: 3018-E
Date AL filed: March 18, 2014
Utility Contact Person: Darrah Morgan
Utility Phone No.: (626) 302-2086

Date Utility Notified: April 10, 2014 via: email
[X] E-Mail to: darrah.morgan@sce.com

Fax No.: N/A
ED Staff Contact: John David Erickson
For Internal Purposes Only:)
Date Calendar Clerk Notified _____/_____/_____
Date Commissioners/Advisors Notified ___/___/___

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cc:
EDTariffUnit

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SOUTHERN CALIFORNIA EDISON
An EDISON INTERNATIONAL Company

Megan Scott-Kakures
Vice President, Regulatory Operations

March 18, 2014

ADVICE 3018-E
(U 338-E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
ENERGY DIVISION

SUBJECT: Establishment of the Customer Data Access Program for Release of Customer Interval Usage Data to Third Parties and the Associated Rule 26, Release of Customer Data to Third Parties

In compliance with Decision (D.)13-09-025, Ordering Paragraph (OP) 18 and 19 Southern California Edison Company (SCE) hereby submits for filing its Rule 26, Release of Customer Data to Third Parties. The tariff sheets are listed on Attachment A and are attached hereto.

PURPOSE

Pursuant to D.13-09-025, OPs 18 and 19, this advice filing establishes SCE's service offering to allow Third Parties access to SCE customers' interval usage data through the Customer Data Access (CDA) program and SCE's Rule 26, Release of Customer Data to Third Parties (Rule 26), as proposed in Application 12-03-004, In the Matter of Pacific Gas and Electric Company for Adoption of its Customer Data Access Project and consistent with OP 8 of D.11-07-056, Adopting Rules to Protect the Privacy and Security of the Electricity Usage Data of the Customers of Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company.

BACKGROUND

In D.11-07-056, rules were adopted to protect the privacy and security of customer usage data obtained by the California investor-owned utlities' Advanced Metering Infrastructure (AMI) systems, as required by Senate Bill 1476 (Chapter 497). On September 19, 2013, Advice 2819-E was approved by Resolution E-4599 thereby implementing Rule 25, Protecting the Privacy and Security of Customer Usage

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Information (the Data Privacy Rule), and the Authorization or Revocation of Authorization to Receive Customer Interval Usage Information, Form 14-929.

Furthermore, in compliance with D.11-07-056, OP 8, on March 5, 2012, Pacific Gas and Electric Company, SCE and San Diego Gas & Electric Company (collectively the IOUs) filed Application 12-03-002, 12-03-003, and 12-03-004, respectively, proposing a Customer Data Access (CDA) Program Third Parties could use, consistent with the Data Privacy Rule, to access customers' interval usage data. On September 19, 2013, D.13-09-025 was issued establishing guidelines for adoption of the CDA program and ordered the IOUs to file an advice letter seeking approval of a tariff offering for CDA services to Third Parties. The service offering and related tariff is discussed herein.

THE CUSTOMER DATA ACCESS PROGRAM

The IOUs have collaborated extensively to ensure a consistent CDA solution, to enhance customer experience, mitigate risk, and ensure consistency of experience for Third Parties and customers alike through the entire CDA implementation and program process. Furthermore, the IOUs collaborated and coordinated to provide similar standards, data platforms, data types, and similar procedures for access of data by Third Parties and methods of interacting with customers. The IOUs business processes were assessed to ensure alignment wherever possible. Finally, a WebEx workshop was held on March 6, 2014 with the IOUs and participating vendors where the IOUs presented to these entities the basic construct of the CDA program and answered questions.

The following describes the Service Offering, Third Parties Eligibility Requirements, Customer Authorization, Data Request Fulfillment (data types, platform, standards, and access), Third Parties Revocation, Customer Interaction, and the Implementation Timeline as agreed upon by the IOUs.

Service Offering:

Customer Data Access: Third Parties Access to Customer Interval Usage Data

SCE's service offering, CDA program, will allow Third Parties access to customer interval usage data through the CDA platform using the Energy Service Provider Interface (ESPI) standard. The technology platform will support the CDA program that provides customer-authorized release of interval usage data to Third Parties. The transfer of this data will be supported in a secure, automated manner, consistent with the ESPI standard adopted by the North American Energy Standards Board (NAESB).[1] Details regarding this automation and security will be found in the following sections detailing these components.

Third Parties may request access of customer interval usage data by going on-line at SCE's website. Once the Third Party's on-line request has been approved by SCE, the

[1] REQ. 21.3.1 General Practices for Energy Services Provider Interface (ESPI)

Third Party will be able to retrieve customer interval usage data on a next-day basis. This next-day access will commence one to five days after the on-line request has been accepted by SCE.

At this point in time, the data released through the CDA program will be limited to interval usage data and provided the next-day – which is consistent with national NAESB standards. Additional data elements may be available in the future in accordance with user adoption and regulatory demands.

This service offering is at no cost to Third Parties for basic machine-to-machine connectivity between SCE and Third Parties systems in order to ensure technical capability and to receive data, as specified in Rule 26. In the event Third Parties require technical consultation from SCE which goes beyond basic machine-to-machine connectivity or if Third Parties request data beyond the provisions of Rule 26, SCE may charge a fee for those requests under other California Public Utilities Commission (Commission or CPUC) approved tariffs (e.g., Rule 22, Schedule CCA-INFO).

Third Parties Eligibility Requirements

For Third Parties to be eligible for CDA, they must meet four requirements:

1. Submission of basic company information (e.g. name, contact, Federal Tax ID numbers),

2. Acknowledgment of receipt of applicable utility tariffs governing customer usage data privacy and the automated transmission of usage data to customer authorized Third Parties,

3. Demonstrated technical eligibility criteria (subject to change at utility's discretion and consistent with national standards), and

4. Not be on the Commission ineligibility list.

Technical eligibility criteria are not yet formally documented, but will likely include elements such as a connectivity test (machine-to-machine) and ensured Third Parties connectivity. These criteria will be published and displayed on the SCE website once they are confirmed. Given that they are eligible, Third Parties will go through a registration process to initiate their participation in the CDA program. The Third Party registration process includes the following:

1. Third Parties ability to register via web portal: Third Parties are invited to a portal to enter their information, confirm the key corporate contacts, and begin the connectivity process,

2. Acknowledgement of SCE's Tariff Rules, Terms and Conditions: Third Parties are provided the applicable tariff rules, as well as standard terms and conditions

to read during the registration process, to which they are required to acknowledge and agree prior to advancing through the process,

3. Third Parties Validation (e.g. valid email, not on ineligible list): an Automated System checks the existing CPUC ineligibility list and validates the Third Parties email to ensure that the contact information and eligibility requirements are met, and

4. Third Parties / Utility Connectivity Test: Third Parties receive instructions to ensure that the machine-to-machine connectivity and communication is secured and that their systems are capable of accessing the customer interval usage data.

SCE has created a Relationship Management Group – a specially trained group of individuals that is prepared to assist any Third Party or customer with concerns that relate to the CDA program. This group will address the concerns of the Third Parties as they go through the registration process, including limited technical support through the connectivity tests.

Customer Authorization

The CDA program is designed to allow customers to release their interval usage data to Third Parties through an online authorization process. The process includes the following six steps:

1. Customer selects a Third Party from an approved list,

2. Customer enters Release of Data information (e.g. timeframe, account IDs),

3. Customer agrees to Terms and Conditions,

4. Customer accesses the landing page on Third Party's website to authorize release of interval usage data by service account,

5. Customer accesses SCE's portal to complete Authorization , and

6. Data will be available to the Third Party within one to five days after the online request has been accepted by SCE. For initial requests, the Third Party will be provided 13 months of historical data.

Terms and Conditions are facilitated through SCE.com "My Account." My Account permits users to select from displayed Account IDs versus needing to enter the Account ID information. When customers select a timeframe, they may select a start-date and duration or, if they would like to keep the selection open-ended, they may select "indefinite." Customers will also have the option to submit a hard copy authorization form for participation in the CDA program.

Data Request Fulfillment and Security

Data request fulfillment utilizes a Unique ID that connects the customer's service account, the Third Parties, and SCE's back-end system. The Unique ID (specific to a Third Party) is used in place of a service account and allows a Third Party to match data to identify the customer while protecting service account data and ensuring protection of customer data. In addition, Data Privacy rules must be adhered to by the Third Parties and acknowledged by them upon registration.

This technology platform facilitates a secure gate to the data through an authorized provisioned token. This token allows Third Parties to access and retrieve data that is placed on the secured server.

Third Party Revocation

Revocation of Third Party access to customer interval usage data can occur through three different triggers: customer, Third Party, or CPUC invoked. Customer revocation is processed through a revocation request. Following such request, both the customer and the Third Party are notified. Third Party invoked revocation could occur under any circumstance in which the Third Party willingly revokes its own access (going out of business, etc.). CPUC invoked revocation can be the result of an investigation of misuse of data, or at the discretion of the CPUC. Under all of these triggers, there will be immediate system revocation of access to future-dated data.

If a customer suspects a Third Party is misusing their data, a customer may submit a misuse of data online form electronically or Customer Contact Center can submit on the customer's behalf to the Relationship Management Group. In the case of SCE identification, SCE will complete the same form and submit it to the CDA program administrators. Upon form submission, SCE will enter into a 21-day resolution period during which the Third Party continues to receive data. Within the 21 days, SCE is responsible to investigate the claim and its validity. If the claim is found to be valid, the CDA program escalates the complaint to the CPUC. Upon receiving the escalation, the CPUC can request additional analysis, make a revocation decision, or postpone their decision. In the case of a revocation decision, the CPUC will provide direct notification to all IOUs regarding Third Party revocations, and the Third Party will be automatically added to the CPUC ineligible list to prevent future access of data.

For reporting, the current internal ad hoc reporting and annual authorization (Customer Information Service Request, "CISR") reports sent to CPUC will be continued and will include the CDA enabled form (Form 14-929).

Customer Interaction

The Relationship Management Group will address program activities, in particular to address the concerns and interactions with customers and Third Parties. These

program owners will be trained and capable of handling the nuances of the CDA program, and related registration, account management, etc. This group has committed to providing technical customer support during registration, processing manual authorizations (Form 14-929), responding to program inquiries, and managing misuse of data complaints.

SCE's Customer Contact Center will assist in this support, and will be available for Third Parties and customers. When appropriate, they will forward customers and Third Parties to the CDA program administrators.

Implementation Timeline

SCE will follow a staggered approach for implementation. Initially, SCE will implement a "soft launch," partnering with a Third Party, to test stability and user experience. This soft launch will take place in fourth Quarter of 2014.

Following the soft launch and upon system stabilization, SCE will continue to add Third Parties on a first come first served basis.

For active Customer Information Service Requests pre-CDA implementation, Third Parties will not be automatically transferred to the CDA platform. Authorization and successful connectivity tests are required for entry. Customers will not be automatically transferred to the CDA platform, as doing so could compromise customer security by aversion of the OAuth process (the creation of the unique ID that allows third parties, SCE and the customer to share information without revealing the service account number or other sensitive information), required for data privacy and security, as well as data management.

PROPOSED TARIFF MODIFICATIONS

SCE proposes to establish Rule 26, Release of Customer Data to Third Parties to support the implementation of the CDA program. The Rule covers the following:

Applicability – includes (a) a definition of "Customer Data," (b) reference to the Form 14-929 titled "Authorization or Revocation of Authorization to Receive Customer Interval Usage Information" that will be used to initiate the process, and (c) reference to a section in Rule 25 as it pertains to Third Parties.

Customer Authorization/Revocation - includes (a) information regarding the customer authorization process and when the data will be available after the application is processed, (b) customer revocation request processing once SCE receives the request, and (c) other means of revocation of authorization.

Service Offering - includes (a) timeline when the data will be made available and how long it will be available once the request is processed, (b) type of data that will be

offered, (c) how often the data will be updated, and (d) if there are any costs involved in providing such data,

Third-Party Eligibility Requirements - includes (a) basic information a Third Party must provide in order to register, (b) requirements necessary for a Third Party to be able to receive customer data in a secure manner consistent with the NAESB ESPI Standards, (c) acknowledgement of receipt of SCE's Rule 25 and 26 and terms conditions, (d) requirement that Third Parties provide a clear notice of transparency regarding the data they are collecting, storing, and using, and (e) requirement of Third Parties to provide a Federal Tax ID as a unique identifier to track its registration in CDA across the state IOUs.

Third Party Ineligibility by Order of the Commission – includes (a) discussion of the list of ineligible Third Parties which is posted on the CPUC website, (b) SCE's actions with respect to Commission's list with regards to addressing a violations by the Third Parties, (c) Commission's authority to extend, or shorten the resolution period to address a Third Party violation, and (d) customer's authorization to release its information to a Third Party once they have successfully registered.

Limitations of Liability - includes a discussion on limitations of liability.

No cost information is required for this advice filing.

This advice filing will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

TIER DESIGNATION

Pursuant to D. 13-09-025 OP 18, this advice letter is submitted with a Tier 1 designation.

EFFECTIVE DATE

This advice filing will become effective on April 17, 2014, the 30th calendar day after the date filed.

NOTICE

Anyone wishing to protest this advice filing may do so by letter via U.S. Mail, facsimile, or electronically, any of which must be received no later than 20 days after the date of this advice filing. Protests should be mailed to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Copies should also be mailed to the attention of the Director, Energy Division, Room 4004 (same address above).

In addition, protests and all other correspondence regarding this advice letter should also be sent by letter and transmitted via facsimile or electronically to the attention of:

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

There are no restrictions on who may file a protest, but the protest shall set forth specifically the grounds upon which it is based and shall be submitted expeditiously.

In accordance with Section 4 of GO 96-B, SCE is serving copies of this advice filing to the interested parties shown on the attached GO 96-B, R.08-12-009, and A.12-03-002 et al service lists. Address change requests to the GO 96-B service list should be directed by electronic mail to AdviceTariffManager@sce.com or at (626) 302-4039. For changes to all other service lists, please contact the Commission's Process Office at (415) 703-2021 or by electronic mail at Process_Office@cpuc.ca.gov.

Further, in accordance with Public Utilities Code Section 491, notice to the public is hereby given by filing and keeping the advice filing at SCE's corporate headquarters. To view other SCE advice letters filed with the Commission, log on to SCE's web site at https://www.sce.com/wps/portal/home/regulatory/advice-letters

For questions, please contact Lisa Vellanoweth at (626) 302-2021 or by electronic mail at Lisa.Vellanoweth@sce.com

Southern California Edison Company

/s/ Megan Scott-Kakures
Megan Scott-Kakures

MSK:lv/pc:jm
Enclosures

CALIFORNIA PUBLIC UTILITIES COMMISSION

ADVICE LETTER FILING SUMMARY
ENERGY UTILITY

MUST BE COMPLETED BY UTILITY (Attach additional pages as needed)

Company name/CPUC Utility No.: Southern California Edison Company (U 338-E)

Utility type:	Contact Person: Darrah Morgan
☑ ELC ☐ GAS	Phone #: (626) 302-2086
☐ PLC ☐ HEAT ☐ WATER	E-mail: Darrah.Morgan@sce.com
	E-mail Disposition Notice to: AdviceTariffManager@sce.com

EXPLANATION OF UTILITY TYPE

ELC = Electric GAS = Gas
PLC = Pipeline HEAT = Heat WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 3018-E Tier Designation: 1

Subject of AL: Establishment of the Customer Data Access Program for Release of Customer Interval Usage Data to Third Parties and the Associated Rule 26, Release of Customer Data to Third Parties

Keywords (choose from CPUC listing): Compliance

AL filing type: ☐ Monthly ☐ Quarterly ☐ Annual ☑ One-Time ☐ Other

If AL filed in compliance with a Commission order, indicate relevant Decision/Resolution #:

Decision 13-09-025

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL:

Summarize differences between the AL and the prior withdrawn or rejected AL:

Confidential treatment requested? ☐ Yes ☑ No

If yes, specification of confidential information:
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.
Name and contact information to request nondisclosure agreement/access to confidential information:

Resolution Required? ☐ Yes ☑ No

Requested effective date: 4/17/14 No. of tariff sheets: -8-

Estimated system annual revenue effect: (%):

Estimated system average rate effect (%):

When rates are affected by AL, include attachment in AL showing average rate effects on customer classes (residential, small commercial, large C/I, agricultural, lighting).

Tariff schedules affected: Form 14-935 and Table of Contents

Service affected and changes proposed[1]:

Pending advice letters that revise the same tariff sheets: None

[1] Discuss in AL if more space is needed.

Protests and all other correspondence regarding this AL are due no later than 20 days after the date of this filing, unless otherwise authorized by the Commission, and shall be sent to:

CPUC, Energy Division
Attention: Tariff Unit
505 Van Ness Avenue
San Francisco, California 94102
E-mail: EDTariffUnit@cpuc.ca.gov

Megan Scott-Kakures
Vice President, Regulatory Operations
Southern California Edison Company
8631 Rush Street
Rosemead, California 91770
Facsimile: (626) 302-4829
E-mail: AdviceTariffManager@sce.com

Leslie E. Starck
Senior Vice President, Regulatory Affairs
c/o Karyn Gansecki
Southern California Edison Company
601 Van Ness Avenue, Suite 2030
San Francisco, California 94102
Facsimile: (415) 929-5544
E-mail: Karyn.Gansecki@sce.com

Cal. P.U.C. Sheet No.	Title of Sheet	Cancelling Cal. P.U.C. Sheet No.
Original 54364-E	Rule 26	
Original 54365-E	Rule 26	
Original 54366-E*	Rule 26	
Original 54367-E*	Rule 26	
Original 54368-E	Rule 26	
Original 54369-E	Rule 26	
Revised 54370-E	Table of Contents	Revised 54063-E
Revised 54371-E	Table of Contents	Revised 54064-E

Rule 26 Sheet 1

RELEASE OF CUSTOMER DATA TO THIRD PARTIES

A. APPLICABILITY

The following rules apply to SCE's automated, ongoing provisioning of interval usage data,[i] henceforth referred to as "Customer Data," to customer-authorized third-parties using an electronic platform known as the Customer Data Access (CDA) platform. The data available through this platform is specifically identified in SCE's "Authorization or Revocation of Authorization to Receive Customer Interval Usage Information" (Form 14-929). This tariff rule governs SCE and the following parties:

1. SCE customers with open service accounts and where advanced metering is installed; and

2. Third parties authorized by SCE customers in Form 14-929 to receive Customer Data provided that the third parties comply with Rule 25 and are eligible pursuant to Section B below. A copy of Rule 25, Protecting the Privacy and Security of Customer Usage Information, may be found at www.SCE.com.

B. CUSTOMER AUTHORIZATION/REVOCATION

1. Customer Authorization. Upon receipt of a completed Form 14-929 and third party adherence to this Rule, SCE shall make Customer Data available to eligible customer-authorized third parties within one to five days.

2. Customer-Initiated Revocation of Authorization. Customers may revoke a third party's authorization to receive Customer Data at any time. Upon receiving the revocation request, SCE shall cease transmission of the customer's data and shall notify the third party via electronic notification provided by the third party within one business day of the customer's revocation of authorization.

3 Other Means of Revocation of Authorization. Authorization for a third party to receive Customer Data may also be revoked automatically by the Commission pursuant to Section E below, or if a third party otherwise becomes ineligible for failure to meet the other requirements of Section E below.

[i] Additional data types may be available through this platform in the future.

(Continued)

(Continued)

C. SERVICE OFFERING

1. Availability of Data. Customer-authorized third parties must retrieve the Customer Data for a given day within five days of it being made available by the data custodian after which time that data will be removed. SCE reserves the right to charge fees for re-transmission of data that third parties failed to retrieve in a timely manner.

2. Description of Data. At the customer's election, authorized third parties meeting the eligibility criteria in Section D below shall electronically receive Customer Data which shall at a minimum include, 13 months of historical interval usage data, and, on an ongoing basis as needed, next-day, interval usage data, in a data format consistent with national standards codified by and maintained at the North American Energy Standards Board (NAESB) known as the NAESB Energy Service Provider Interface (ESPI) Standard. The applicable portion of the Customer Data governed by this Rule shall correspond to the interval usage data recorded by the customers' meters. SCE shall update the data format available through the CDA platform to the extent the NAESB ESPI standards are modified from time to time. The "Reading Quality" flag as provided in the NAESB ESPI Standard will be employed to indicate the quality of meter data provided through the CDA platform.[i]

3. Data Updates. SCE will transmit Customer Data once per day at the end of each business day. Customer Data transmitted at the end of each business day is the most current information at that time and includes any data updates throughout the day. SCE bears no obligation to transmit Customer Data once a customer's authorization of the third party's right to receive the data has expired or is otherwise terminated, as referenced in Section E, below.

4. Cost. SCE shall make Customer Data available through the CDA platform free of charge to customer-authorized third parties provided that the data is retrieved timely under Section C.1 above. Nothing in this Rule is intended to modify, directly or indirectly, service or data fees established in other applicable tariff rules or schedules.

[i] NAESB ESPI Standard p.25 and 28.

(Continued)

RELEASE OF CUSTOMER DATA TO THIRD PARTIES

(Continued)

D. THIRD-PARTY ELIGIBILITY REQUIREMENTS

Third Parties are subject to the following conditions in order to obtain and maintain access to Customer Data.

1. Provide and Update Contact Information. Third parties must input basic contact information at the Third Party Registration Web Page at http://on.sce.com/3rdparty, including company/entity's name, federal tax identification number, mailing address, and the names, telephone numbers, mailing addresses, and email addresses for any key business and technical contacts at the company/entity. Third parties are solely responsible for making timely updates to that information, as may be required from time to time.

2. Technical Eligibility. Third parties must demonstrate connectivity aptitude through the machine-to-machine verification of the third parties' technical feasibility to receive Customer Data securely from SCE, as described in more detail at http://on.sce.com/3rdparty. SCE shall work in good faith to resolve technical issues that may arise with third parties seeking technical eligibility. Such work will be limited to connectivity to the CDA platform and SCE will put forth a reasonable effort to resolve technical issues regarding such connectivity. SCE will not provide technical consulting to resolve any connectivity issues on the side of the third party. Technical eligibility criteria may change, from time to time, consistent with the NAESB ESPI Standard.

3. Acknowledge Receipt of Applicable Tariff. Upon determining that a third party is technically eligible to receive Customer Data as provided in Section D.2, above, the third party must acknowledge receipt of and has read and understands the terms and conditions of SCE's Rule 25 and this Rule.

4. Transparency. Third parties shall continue to provide customers with clear notice regarding their accessing, collection, storage, use, and disclosure of Customer Data.

5. Identifier. Third party shall provide SCE with a Federal Tax ID number which can be used to track its registration in CDA across the state utilities.

Currently authorized third party agents can be found at http://on.sce.com/3rdparty.

(Continued)

(Continued)

E. THIRD PARTY INELIGIBILITY BY ORDER OF THE COMMISSION

1. Commission's List of Prohibited Third Parties. Pursuant to D.13-09-025, the Commission may create and maintain a list of third parties whom the Commission has determined are not eligible to receive customer usage data, even when authorized by the customer, under the CDA platform. The list shall be posted on the Commission's website at www.cpuc.ca.gov. Should a third party be included on this list, SCE will deem the list to be an order by the Commission declaring the party ineligible to participate on the CDA platform unless and until either (a) the party's name is lifted from the Commission's list of entities prohibited from receiving customer usage data; or (b) the Commission's order has been stayed or enjoined by the appropriate court or agency. The Commission will also provide direct notification to SCE regarding any changes to the list. SCE is not responsible for creating maintaining or continuously monitoring the Commission's list.

2. SCE Actions With Respect To Commission List. Customers will have access to a "potential violation" form on http://on.sce.com/3rdparty which they can electronically submit to SCE if they suspect third party mishandling of data or non-compliance with this Rule or Rule 25. Customers may also call SCE's Customer Contact Center to report these suspicious activities. After reviewing the case, and in the event that SCE reasonably suspects that a third party has violated state law or SCE's Rule 25, Protecting the Privacy and Security of Customer Usage Information, it shall serve the third party and the Commission's Energy Division with a notice of the suspected tariff violation along with any information regarding possible wrongdoing. SCE shall seek to resolve the suspected tariff violations with the third party during a 21-day resolution period, during which time SCE will continue transmission of data unless otherwise requested by the customer. At its discretion, the Energy Division staff may facilitate resolution of the issues between SCE and the third party, and may grant an additional 21-day period for resolving the issue. If the matter is not resolved during the period set for resolution, SCE shall file a Tier 2 advice letter seeking to move the third party to the list of entities ineligible to receive customer data via the CDA platform. SCE shall provide notice of this filing to all customers who have selected that third party to receive their Customer Data. Until Commission action resolves the matter, SCE will continue to transmit data, unless otherwise requested by the customer.

(Continued)

(Continued)

E. THIRD PARTY INELIGIBILITY BY ORDER OF THE COMMISSION (Continued)

3. Commission Authority and Discretion. The Commission has authority to reduce or eliminate the 21-day resolution period referenced in the immediately preceding sub-section. The Commission also has the authority to address the advice letter referenced the immediately preceding sub-section above in an expedited manner, the authority to investigate the issue on its own motion, the authority to address a complaint filed at the Commission by the customer concerning the rules and obligations under this Rule or Rule 25, Protecting the Privacy and Security of Customer Usage Information, and the authority to determine the appropriate remedy, if necessary, for any tariff violation.

4. Customer Authorization. Successful and valid "registration" with SCE, pursuant to Sections B.1 through E.3 above, are necessary but not sufficient conditions before a third party can receive interval usage data under this Rule. Valid and current customer authorization pursuant to Section B is always required.

F. LIMITATIONS OF LIABILITY

1. SCE shall not be deemed to have transmitted Customer Data recklessly provided that it follows the requirements of D.13-09-025 as incorporated in this Rule and Rule 25.

2. The limitation of liability included in Section 9.f. of Rule 25 is incorporated herein as follows: "SCE shall not be liable for any claims, demands, causes of actions, damages, or expenses arising from or resulting from any release of Covered Information or other confidential customer information pursuant to a customer's written authorization, legal process or the Commission's order; the unauthorized use of Covered Information or other confidential customer information by a third party receiving such information from SCE pursuant to a customer's written authorization, legal process or the Commission's order; or any actions taken by a customer-authorized third party. After SCE makes a secure and authorized transfer of Covered Information to a third party pursuant to customer authorization or Commission order, SCE shall not be responsible for the security of the Covered Information or data or its use or misuse by a third party."

3. The CDA platform is designed primarily to provide next-day interval Customer Data from SCE's back office systems. That data may not be complete or accurate, and may be updated before and after bills are issued to customers. The data on the CDA platform is transmitted on an "as is" and "as available" basis. SCE shall not be liable for the inability of customers or their authorized third parties to access the CDA platform, or for SCE's delay in updating or failure to update any information, for whatever reason.

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(Continued)

F. LIMITATIONS OF LIABILITY (Continued)

4. SCE does not warrant that the CDA platform will be timely, secure, uninterrupted, or error-free, or that defects in the CDA platform, as may exist from time to time, will be corrected. SCE will not be responsible for errors, omissions, interruptions, deletions, defects or delays in the operation of or transmission of data through the CDA platform, including those due to communication line failures, or computer viruses associated with the operation of SCE's website or platform.

5. SCE, its affiliates or subsidiaries, and their officers, directors, employees, agents, successors, or assigns, will not be liable to customers or any third party for any indirect, consequential, incidental, exemplary, special or punitive damages resulting from lost data or lost profits arising out of or in connection with the CDA.

6. SCE does not warrant the immediate revocation of a third party's authorization status without direct notice from the Commission on its change of status to a prohibited party.

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SOUTHERN CALIFORNIA
EDISON
An *EDISON INTERNATIONAL* Company

Lisa Vellanoweth
Manager of Tariffs

April 16, 2014

California Public Utilities Commission
505 Van Ness Avenue, Room 4005
San Francisco, CA 94102

Attn: Tariff Unit
Energy Division

Re: Substitute Sheet for Advice 3018-E

Dear Energy Division Tariff Unit:

Enclosed are an original and one copy of Attachment A and Substitute Sheet Numbers 54366-E* and 54367-E* of Advice 3018-E. These documents are submitted to update the URL of the Third Party Registration Web Page from "www.SCE.com" to "http://on.sce.com/3rdparty."

These substitute sheets are filed in accordance with General Order 96B, General Rules, Section 7.5.1 to make minor revisions to an Advice Filing prior to its requested effective date. Please include the enclosed sheets in your master Advice 3018-E. If you have any questions, please contact Lisa Foulds at (626) 302-2010.

Sincerely,

Lisa Vellanoweth

Enclosures
3018-ESub.doc

cc: A.12-03-002
R.08-12-009
GO 96B

* An asterisk denotes a substituted sheet.

P.O. Box 800 8631 Rush St. Rosemead, California 91770 (626) 302-2021 Fax (626) 302-1626