

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

In the Matter of the Application of)	Application No. 06-08-010
San Diego Gas & Electric Company)	(Filed August 4, 2006)
(U-902) for a Certificate of Public)	
Convenience and Necessity for the)	
<u>Sunrise Powerlink Transmission Project.</u>)	

**RESPONSE OF THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION TO ADMINISTRATIVE LAW JUDGE’S RULING SEEKING
FURTHER RESPONSE ON REQUESTS RELATED TO CONFIDENTIALITY**

Pursuant to the August 24, 2007 ruling of Administrative Law Judge Weissman, (“ALJ Ruling”), the California Independent System Operator Corporation (“CAISO”) submits its further response regarding the treatment of information that has been identified as confidential. The ALJ Ruling requests that parties seeking confidential treatment for information to be placed in the record supplement any earlier pleadings regarding confidentiality with answers to certain questions identified in the ALJ Ruling.¹ The CAISO opposes requests by the Utility Consumer Action Network (“UCAN”) and Rancho Penasquitos Concerned Citizens (“RPCC”) for the release of a limited amount of information marked by the CAISO as confidential and provided to parties during discovery pursuant to non-disclosure agreements. Therefore, in accordance with the schedule set forth in the ALJ Ruling, the CAISO hereby submits its response.

I. BACKGROUND

In the CAISO’s July 6, 2007, Response to the Requests for Release of Confidential Information, the CAISO noted that much of the data that had been redacted in UCAN’s testimony was not confidential; but rather, came from a source document that

¹ ALJ Ruling at 5.

did contain confidential information. In its response, the CAISO stated that as long as the source documents are not offered into evidence, it does not have confidentiality concerns. As a result, the only redacted information appearing in UCAN's testimony for which the CAISO seeks confidential treatment is contained in the Path 44 upgrade discussion beginning on page 36 and continuing to the top of page 40 of Mr. Marcus' testimony. In particular, the path loadings and emergency ratings are confidential information that should not be publicly disclosed for the reasons discussed in the CAISO's response. All in all, three paragraphs out of 216 pages of testimony and one out of 774 footnotes contain information for which the CAISO seeks confidential treatment.

RPCC attached two confidential source documents to its testimony, containing information from the Western Electricity Coordinating Council ("WECC") database concerning SDG&E line ratings and loadings. In its Response to RPCC's request for the public release of the information, the CAISO suggested that the confidential information be redacted from the documents. However, during the evidentiary hearing when RPCC sought to introduce these documents as cross-examination exhibits, SDG&E agreed to waive confidentiality objections regarding the data (Tr., 570). Thus, the CAISO has no confidentiality concerns with respect to the documents attached to RPCC's testimony.

At this point in time, it does not appear that any party is seeking public disclosure of other information identified by the CAISO as confidential through cross-examination or the introduction of cross examination exhibits. Should this change, the CAISO reserves the right to raise additional objections at the time the information is offered on the record.

II. DISCUSSION

A. Third Party Confidentiality Agreements

The ALJ Ruling notes that it is not a sufficient basis for confidential treatment to simply argue that the information has been provided to the requesting party pursuant to a non-disclosure agreement.² The CAISO has not made such an assertion in this proceeding but instead has set forth a substantive basis for requesting confidential treatment of line ratings and loadings.

B. Critical Energy Infrastructure Information

The ALJ Ruling also addresses information that parties assert should qualify as Critical Energy Infrastructure Information (“CEII”) under 18 CFR 388.113(c)(1)(iii). Specifically, the ALJ Ruling asks how the claimed CEII is “exempt from mandatory disclosure under the Freedom of Information Act” as required in the definition of “crucial energy infrastructure information.”³ The CAISO has identified the loadings on certain lines, described in the redacted portions of Mr. Marcus’ testimony on page 36 (cells 73-74 of the UCAN motion) and the discussion of the rating on Path 44, including the reference to a CAISO confidential document at footnote 147 (cells 86-87), as information that qualifies as CEII.

The Federal Energy Regulatory Commission (“FERC”) has held that CEII is exempt from mandatory disclosure under exemption 7(F) of the Freedom of Information Act (“FOIA”) [5 USCS §552(b)(7)(F)]. In *In Re Hala Ballouz*, Docket No. CE07-121-000 119, *F.E.R.C. P62,204; 2007 FERC LEXIS 1058* (June 8, 2007), FERC found that load flow base case models contained information exempt from mandatory disclosure

² ALJ Ruling at 3.

³ ALJ Ruling at 3.

under that FOIA exemption because the data⁴ “could be used to harm the electric grid, which would endanger life and safety.” The requested load flow information was thus deemed to be CEII under 18 CFR §388.113(c)(i) and was accorded confidential treatment. Such power flow base case information includes line ratings and all of the other information contained in the confidential source documents that the CAISO has been providing to parties in this proceeding under confidentiality agreements. Accordingly, such information should not be publicly disclosed.

The ALJ Ruling also asks parties whether CEII data has been voluntarily submitted to the California Office of Homeland Security (“OHS”). The CAISO has not made such a submission. However, it is important to note that the CEII does not involve physical facilities owned by the CAISO – the CAISO is simply the custodian of CEII to the extent that the information is used for grid reliability and planning analyses. Thus, it would not be the role of the CAISO to submit such CEII information, such as the transmission studies conducted for this proceeding, to the OHS. It is possible, however, that the owners of the facilities described in the confidential CAISO documents have provided information to the OHS. Under these circumstances, when a third party seeks disclosure of CEII, the CAISO must assert confidentiality on behalf of the owner of the information. As was the case with the two confidential source documents attached to RPCC’s testimony, the owner of the facilities (in this instance SDG&E) can waive confidentiality - the CAISO, however, cannot.

In addition, the ALJ Ruling asks whether Government Code Section 6245 of the California Public Records Act; apply to the information sought to be afforded

⁴ *In Re Hala Ballouz*, ¶12, p. 8

confidential treatment.⁵ The CAISO did not discuss Section 6245 in its response to the requests for release of confidential information, relying instead on the exemptions for CEII from the FOIA. However, it appears that the Section 6245(f) exemption for “...any investigatory or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes...” would provide an exemption from state public records requirements similar to the protection found in 5 USCS §552(b)(7)(F).

Furthermore, the Section 6245(bb) exemption for CEII voluntarily submitted to the OHS is reflective of 6 USCS §133, which provides for the protection of critical infrastructure information when voluntarily submitted to a covered federal agency. The CAISO notes that Section 6245(bb) specifically provides that “(t)his subdivision shall not affect the status of information in the possession of any other state or local governmental agency,” which seems to suggest that the Commission can afford confidential treatment to information in its possession regardless of whether the information has been voluntarily supplied to the OHS. Thus, the CAISO urges the Commission to protect the information identified as CEII regardless of whether it has been submitted to that agency.

It bears repeating that the nub of the issue herein is not whether the information deemed to be confidential is made available to the parties and the Commission for the purposes of rendering a decision in this proceeding, but whether there is an overriding public policy need for the information to be placed in the public record. Given the highly technical nature of the information, and the very real threat to public safety and security if CEII is released, as recognized by the FERC, the motions for release of confidential information should be denied.

⁵ ALJ Ruling at 4.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served, by electronic and U.S. Mail, a copy of the Response Of The California Independent System Operator Corporation To Administrative Law Judge's Ruling Seeking Further Response On Requests Related To Confidentiality to all parties in Docket Number A.06-08-010.

Dated at Folsom, CA, on this 12th day of September, 2007.

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