



DRA

*Division of Ratepayer Advocates
California Public Utilities Commission*

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JOSEPH P. COMO
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March 29, 2011

Honorable Alex Padilla
California State Senate
State Capitol, Room 4038
Sacramento, CA 95814

RE: SB 674 (Padilla) - Support

Dear Chairman Padilla:

The Division of Ratepayer Advocates (DRA) is the independent consumer advocacy division of the California Public Utilities Commission (CPUC). DRA's statutory mandate is to obtain the lowest possible rate for utility service consistent with reliable and safe service levels. DRA also advocates for customer and environmental protections in connection with utility service.

DRA supports your SB 674, which would, among other things, protect the personal information of electric and gas consumer's that use advanced metering infrastructure (smart meters). As a result, consumer's personal information such as energy usage data would be better protected from unauthorized access, collection or being shared without their consent.

Smart meters provide consumers with many benefits because this technology empowers them to better manage their energy consumption, especially during costly peak times. Consumers who track their energy usage can better control their monthly bills and also help to protect the environment. SB 674 would enable consumers to continue to more easily manage their energy usage with smart meters during these tough economic times while better protecting their privacy.

DRA looks forward to working with you to pass this important legislation. In that regard, we would like to suggest the following ideas that you may want to consider incorporating into SB 674 that came about from last year's smart meter privacy rules discussions:

- Incorporate the U.S. Department of Homeland Security's Fair Information Practice Principles, in combination with customer consent so that those who wish to use customer data are required to disclose the purposes for which the data will be used.

- Require that consent requirements be attached to the customer data itself, applying equally to all entities seeking to utilize such data, including electrical and gas corporations, third parties who contract with corporations, stand-alone third parties who seek the data directly from customers, and government or community-based organizations.

If you have any questions or would like to discuss this matter further, please call DRA's Legislative Director Matthew Marcus, at (916) 327-3455 or me at (415) 703-2381

Respectfully,

Joseph P. Como, Acting Director
Division of Ratepayer Advocates

By
Matthew Marcus
Legislative Director