

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 4, 2020

TO: PARTIES TO PHYSICAL SECURITY PROCEEDING

Service List: R.15-06-009

FIRST REVISION TO INTERIM TRIAL PROCEDURES FOR EXCHANGE OF
HIGHLY-SENSITIVE INFORMATION PERTAINING TO THE PHYSICAL
SECURITY OF ELECTRIC UTILITY ASSETS

This letter, as enabled by Ordering Paragraph (OP) 8 of Decision (D.)19-01-018, modifies the Interim Trial Procedures (ITPs) for utility compliance, whose rules surrounding certain utility reports addressing physical security took effect June 24, 2020. This First Revision to the ITPs as presented within *Attachment A2* is a ministerial change to the process for Commission review of utility physical security plan requirements. The modifications within this First Revision address certain deficiencies in the ITPs identified by Commission staff in the course of their review of investor-owned utility (IOU) physical security work products due to the Commission July 20, 2020. Namely, the changes to the ITPs implemented here provide for improved and more uniform virtual means for remote access to utility data by Commission staff. Such future Commission staff needs would include access to physical security utility work products due to the Commission as well data requests to utilities that may implicate highly-sensitive information.

The Commission's Safety Policy Division (SPD) implements this First Revision to the ITPs to provide for additional assurance of unfettered and timely access by Commission staff to documents for which the IOUs are likely to seek a heightened level of confidential treatment because their contents address utility physical security plans, programs, incidents, and other highly-sensitive matters.

Consistent with OP 9 of D.19-01-018, SPD staff has conferred with California's six electric investor-owned utilities (collectively "joint IOUs") on this First Revision to the ITPs. The joint utilities have an obligation to provide the Commission with major physical security work products which include those prescribed by OP 1, due July 10, 2020, and OP 2, due July 10, 2021.

The ITPs are anticipated to be needed at least until Commission staff receives and reviews the major utility deliverables required by D.19-01-018. The ITPs shall remain in effect until further notice, termination, or modification by the Commission or by the Safety Policy Division Director.

/s/ DAN BOUT

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Attachment A2: Interim Trial Procedures (ITPs) as Modified December 4, 2020,
First Revision