

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 14, 2014

**Advice Letter 4516-E**

Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, CA 94177

**Subject: California Energy Systems for the 21<sup>st</sup> Century Revised  
Proposed Research and Development Projects and Cooperative  
Research and Development Agreement**

Dear Ms. Allen:

Advice Letter 4516-E is effective October 9, 2014.

Sincerely,

A handwritten signature in cursive script that reads "Edward F. Randolph".

Edward F. Randolph, Director  
Energy Division



Clay Faber  
Director – Regulatory Affairs  
8330 Century Park Court  
San Diego, CA 92123-1548

Tel: 858-654-3563  
Fax: 858-654-1788  
CFaber@semprautilities.com

October 9, 2014

**Advice Letter 2656-E**  
(San Diego Gas & Electric ID U 902-E)

**Advice Letter 4516-E**  
(Pacific Gas and Electric Company ID U 39 E)

**Advice Letter 3115-E**  
(Southern California Edison Company ID U 338 E)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**SUBJECT: CALIFORNIA ENERGY SYSTEMS FOR THE 21<sup>ST</sup> CENTURY REVISED PROPOSED RESEARCH AND DEVELOPMENT PROJECTS AND COOPERATIVE RESEARCH AND DEVELOPMENT AGREEMENT**

Pacific Gas and Electric Company (“PG&E”), Southern California Edison Company (“SCE”), and San Diego Gas & Electric Company (“SDG&E”) (collectively referred to as the “Joint Utilities”) hereby submit for filing this joint compliance Advice Letter<sup>1</sup> requesting approval for the California Energy Systems for the 21<sup>st</sup> Century (“CES-21”) proposed multi-year research and development projects and the Cooperative Research and Development Agreement (“CRADA”), as revised per Resolution E-4677.

**PURPOSE**

The purpose of this advice letter is to comply with Resolution E-4677, Ordering Paragraphs (“OP”s) 2, 3, and 4, which direct the Joint Utilities to file updated business cases for the two CES-21 multi-year research and development projects, an updated CRADA, a letter from Lawrence Livermore National Laboratory (“LLNL”) confirming that the cybersecurity project reflects a new contribution and does not duplicate past research efforts, and an updated Joint Utility Report on the scope of the CES-21 Program’s proposed research projects.

---

<sup>1</sup> Resolution E-4677, Ordering Paragraph 4, states that “[t]he advice letter tier shall not be specified by the Joint Utilities, but rather shall be determined by the Commission based on review of its content.”

## **BACKGROUND**

The CES-21 Program is a public-private collaborative research and development project between the Joint Utilities and LLNL. The objective of the CES-21 Program is to address challenges of cyber security and grid integration of the 21<sup>st</sup> century energy system for California. The CES-21 Program will utilize a team of technical experts from the Joint Utilities and LLNL who will leverage and extend ongoing research in grid cyber security and grid integration. LLNL will combine data integration with advanced modeling, simulation, and analytical tools to provide problem solving and planning necessary for the challenges of cybersecurity and grid integration.

On July 18, 2011, the Joint Utilities filed Application (“A.”) 11-07-008, which requested authority to recover the costs for funding the CES-21 Program up to a maximum of \$152.19 million in program funding over five years, with the funding shared among the Joint Utilities as follows: PG&E – 55%, SCE – 35%, and SDG&E – 10%.

In December 2012, the California Public Utilities Commission (“Commission” or “CPUC”) issued Decision (“D.”)12-12-031, which authorized the Joint Utilities to enter into a five-year research and development agreement with LLNL. This decision authorized the Joint Utilities to spend up to \$30 million a year for five years on research activities, for a total of \$152.19 million. The decision also allocated these costs to each of the utilities (PG&E – 55%, SCE – 35%, and SDG&E – 10%) and adopted a ratemaking mechanism for each utility to permit recovery of those costs.

On September 26, 2013, Governor Brown signed Senate Bill (“SB”) 96, which among other things, limited the scope of the CES-21 Program, as previously approved by the Commission in D.12-12-031, to cyber security and grid integration research and development projects not to exceed \$35 million over a five year period.<sup>2</sup> As part of SB 96, the California legislature directed the Commission to require the Joint Utilities to prepare and submit a joint report by December 1, 2013.<sup>3</sup> In compliance with this legislative directive, the Joint Utility Report describes (1) the scope of all proposed research projects, (2) how the proposed projects may lead to technological advancement, (3) how the proposed projects may lead to potential breakthroughs in cyber security and grid integration, and (4) the expected timelines for concluding the projects.<sup>4</sup>

On March 27, 2014, the Commission approved D.14-03-029, which modifies D.12-12-031 to comply with SB 96. In this decision, the Commission:

- Reduces the CES-21 budget to \$35 million (including “franchise fees” and “uncollectibles”) over a five-year period;<sup>5</sup>
- Limits areas of research to “cyber security” and “grid integration”;<sup>6</sup>
- Modifies the cost allocation to PG&E – 50%, SCE – 41%, and SDG&E – 9%;<sup>7</sup>
- Reduces the governance structure to three Project Managers from PG&E, SCE, and SDG&E;<sup>8</sup>

---

<sup>2</sup> SB 96 added Section 740.5 to the Public Utilities Code.

<sup>3</sup> Public Utilities Code Section 740.5 (e)(1).

<sup>4</sup> Submitted to the Commission on November 27, 2013.

<sup>5</sup> D.14-03-029, OP 2.

<sup>6</sup> Id.

<sup>7</sup> Id., OP 6-8.

- Voids any CES-21 program management expenditures incurred to date and caps future administrative expenses to no more than 10% of the total CES-21 budget;<sup>9</sup>
- Requires enhanced Legislative and Commission oversight of the CES-21 Program;<sup>10</sup> and
- Revises the CRADA guidelines and project criteria accordingly.<sup>11</sup>

In Resolution E-4677, the Commission approved the Joint Utilities' Advice Letter, which sought authorization to implement the CES-21 Program pursuant to D.12-12-031 and D.14-03-029.

The Joint Utilities submit this Advice Letter in compliance with Resolution E-4677.

## **DISCUSSION**

### **1. Updated Business Cases for the Machine to Machine Automated Threat Response and Flexibility Metrics and Standards Research and Development Projects**

In Resolution E-4677, the Commission approved the Machine to Machine Automated Threat Response (MMATR) and Flexibility Metrics and Standards projects, as modified, subject to the Joint Utilities filing this compliance advice letter.

This compliance advice letter contains an update business case for the MMATR project that reflects the modifications and clarifications made in Resolution E-4677.

- a. The "MMATR estimated timeline of tasks and work plan" and additional MMATR project management elements identified in this Resolution's discussion section must be fully adopted into the business case and used by the Project Managers of the MMATR Project.
- b. The Project Managers will inform the Director of the Energy Division or the Director's designee via letter if and when any critical path task is considered or selected for discontinuation.
- c. The Project Managers are responsible for managing its progress, continuing to coordinate with other research groups and cybersecurity stakeholders, and keeping the Commission fully informed as the project develops to ensure duplication with other efforts does not arise.<sup>12</sup>

This compliance advice letter also contains an update business case for the Flexibility Metrics and Standards project that reflects the modifications and clarifications made in Resolution E-4677.

- a. To the extent that PG&E's Collaborative Review of Planning Models already identifies applicable gaps, research needs, or limitations of current models that otherwise would have been done in Phase 1, the Project Managers will ensure that

---

<sup>8</sup> Id., OP 9.

<sup>9</sup> Id., OP 10.

<sup>10</sup> Id., 14-16, 20-21.

<sup>11</sup> Id., OP 13.

<sup>12</sup> Resolution E-4677, OP 2.

Phase 1 work builds off these findings and must not spend unnecessary time or project funds on redoing work. Reports containing updates on Phase 1 will clearly identify which aspects of the Collaborative Review have informed the project.

- b. The Project Managers shall form a Collaborative Advisory Group that includes Commission staff, the California Independent System Operator, the Office of Ratepayer Advocates (“ORA”), The Utility Reform Network, and other experts; “Other experts” should include those working on other flexibility models in Commission proceedings. The advisory group will meet once every six months. The primary purpose of the advisory group will be to assist in connecting the Project Managers and project progress with ongoing development
- c. The Project Managers shall incorporate these four actions into the project management process:
  1. The project will use 2014 LTPP assumptions, including the Trajectory Scenario, to evaluate different possible operating flexibility metrics and standards.
  2. The Project Managers will present the preliminary results and recommendations in a public workshop in early 2016 using initial input assumptions from the 2014 LTPP.
  3. Using any applicable 2016 LTPP modeling assumptions that are available during the project time span, the Project Managers will demonstrate the use of any developed flexibility metrics and standards with at least one of the scenarios (and if only one, the Trajectory Scenario/expected case) adopted in the Commission’s 2016 LTPP. This demonstration will be filed within that proceeding.
  4. Project Managers will ensure that parties in the 2016 LTPP will have the opportunity to comment on results and recommendations.<sup>13</sup>
- d. The actions listed in Ordering Paragraph 3c or their proxies shall take place regardless of project or Commission proceeding timelines. Reports will include progress updates toward these actions. Should unforeseen changes prevent them, the Project Managers will inform the Director of the Energy Division or the Director’s designee via letter and work with the Commission to identify the best proxy actions; appropriate proxy actions would be ones that reasonably and intentionally help ensure results are useful and valuable to Commission proceedings.
- e. The Project Managers shall undertake a final stage of activities entitled Transfer Project Benefits and Results, which shall include: i) publishing a final report with findings and recommendations and making it publicly available to all parties through the LTPP, ii) making the full database of detailed modeling input assumptions available, to the extent allowed by the CRADA, iii) ensuring that other parties in the LTPP proceeding will be able to license and use any new or improved tools (if any) that are developed through the project, and iv) an informal training session for Commission staff on the tools and models developed by the project. The Project Managers will inform the Commission via a letter to the

---

<sup>13</sup> Resolution E-4677, OP 3.

Director of the Energy Division or the Director's designee if they become aware of any barriers that could hinder or prevent other parties from licensing or using any tools developed through the project.

- f. The Project Managers shall provide the full database of detailed modeling input assumptions, to the extent allowed by the CRADA, to the Collaborative Advisory Group once the database is available and subsequent to any major changes.

The updated MMATR and Flexibility Metrics and Standards business cases are included in Attachment A.

## **2. Updated Cooperative Research and Development Agreement**

In Resolution E-4677, the Commission directed the Joint Utilities to submit an updated Cooperative Research and Development Agreement (CRADA) with Attachment A updated to include the "MMATR estimated timeline of tasks and work plan" approved by this Resolution, as well as any other changes made herein that are relevant.

Please note that a supplemental filing may be made, by October 15, 2014, in order to update the CRADA further. The CRADA is a collaborative document that requires the Joint Utilities and LLNL to sign-off on the final version. Due to a minor timing issue the parties believe it is best to leave the possibility of a supplemental filing open in order to obtain final sign-off and update the document if necessary.

The updated CRADA is included as Attachment B.

## **3. Letter from LLNL on Cyber Security Research Projects**

In Resolution E-4677, the Commission directed the Joint Utilities to obtain a letter from LLNL on cyber security research projects. This letter confirms LLNL's views that the MMATR research parameters reflect a new contribution to cybersecurity and that this project does not duplicate research being done by other private or governmental entities.

The letter from LLNL is included as Attachment C.

## **4. Revised Joint Utility Report on the Scope of the CES-21 Program's Proposed Research Projects**

In Resolution E-4677, the Commission directed the Joint Utilities to include an updated copy of the Joint Utility Report on the scope of the CES-21 Program's proposed research projects, pursuant to Public Utilities Code Section 740.5(e)(1). This updated version of the Joint Utility Report reflects the revisions made to the business cases in compliance with Resolution E-4677.

The updated Joint Utility Report is included as Attachment D.

## 5. Request for Commission Approval

The Joint Utilities request that the Commission :

- a. Approve the updated business case for the Machine to Machine Automated Threat Response multi-year project, which is included in Attachment A;
- b. Approve the updated business case for the Flexibility Metrics and Standards multi-year project, which is included in Attachment A;
- c. Approve the updated CRADA to reflect the updated CES-21 project business cases, which is included as Attachment B;
- d. Accept the LLNL letter on cyber security research projects, which is included as Attachment D;
- e. Accept the updated Joint Utility Report on the scope of the CES-21 Program's proposed research projects, which is included as Attachment D.

### **PROTESTS**

Anyone wishing to protest this filing may do so by letter sent via U.S. mail, facsimile or E-mail, no later than **October 29, 2014** which is 20 days after the date of this filing. Protests must be submitted to:

CPUC Energy Division  
ED Tariff Unit  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, California 94102

Copies of protests also should be mailed to the attention of the Director, Energy Division, Room 4004, at the address shown above.

The protest shall also be sent to the Joint Utilities either via E-mail or U.S. mail (and by facsimile, if possible) at the addresses shown below on the same date it is mailed or delivered to the Commission:

Meredith Allen  
Senior Director, Regulatory Relations  
Pacific Gas and Electric Company  
77 Beale Street, Mail Code B10C  
P.O. Box 770000  
San Francisco, California 94177  
Facsimile: (415) 973-7226  
E-mail: PGETariffs@pge.com

Megan Caulson  
Regulatory Tariff Manager  
8330 Century Park Court, Room 32C  
San Diego, CA 92123-1548  
Facsimile: (858) 654-1879  
E-mail: [MCaulson@semprautilities.com](mailto:MCaulson@semprautilities.com)

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](mailto:AdviceTariffManager@sce.com)

Michael R. Hoover  
Director, State 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](mailto:Karyn.Gansecki@sce.com)

Any person (including individuals, groups, or organizations) may protest or respond to an advice letter (General Order 96-B, Section 7.4). The protest shall contain the following information: specification of the advice letter protested; grounds for the protest; supporting factual information or legal argument; name, telephone number, postal address, and (where appropriate) e-mail address of the protestant; and statement that the protest was sent to the utility no later than the day on which the protest was submitted to the reviewing Industry Division (General Order 96-B, Section 3.11).

#### **EFFECTIVE DATE**

The Joint Utilities request that this advice filing become effective *upon approval by the Commission*.



**NOTICE**

A copy of this filing has been served on the utilities and interested parties shown on the attached list, including interested parties to service list A.11-07-008, A.12-11-003 and R.08-12-009, et al, by either providing them a copy electronically or by mailing them a copy hereof, properly stamped and addressed. Address changes should be directed to SDG&E Tariffs by facsimile at (858) 654-1879 or by email to [SDG&ETariffs@semprautilities.com](mailto:SDG&ETariffs@semprautilities.com).

---

CLAY FABER  
Director - Regulatory Affairs

Attachment A: Updated CES-21 Proposed Research and Development Project Business Cases

Attachment B: CES-21 CRADA

Attachment C: LLNL Letter on Cyber Security Research Projects

Attachment D: Joint Utility Report on the Scope of the CES-21 Program's Proposed Research Projects

# 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. **SAN DIEGO GAS & ELECTRIC (U 902)**

Utility type:

ELC

GAS

PLC

HEAT

WATER

Contact Person: Joff Morales

Phone #: (858) 650-4098

E-mail: jmorales@semprautilities.com

### EXPLANATION OF UTILITY TYPE

ELC = Electric

GAS = Gas

PLC = Pipeline

HEAT = Heat

WATER = Water

(Date Filed/ Received Stamp by CPUC)

Advice Letter (AL) #: 2656-E, et. al.

Subject of AL: California Energy Systems for the 21<sup>st</sup> Century Revised Proposed Research and Development Projects and Cooperative Research and Development Agreement

Keywords (choose from CPUC listing): Agreement, Joint Utility, Development

AL filing type:  Monthly  Quarterly  Annual  One-Time  Other

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

Resolution E-4677

Does AL replace a withdrawn or rejected AL? If so, identify the prior AL: None

Summarize differences between the AL and the prior withdrawn or rejected AL<sup>1</sup>: N/A

Does AL request confidential treatment? If so, provide explanation: N/A

Resolution Required?  Yes  No

Tier Designation:  1  2  3

Requested effective date: Pending ED

No. of tariff sheets: 0

Estimated system annual revenue effect (%): N/A

Estimated system average rate effect (%): N/A

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: None

Service affected and changes proposed<sup>1</sup>: N/A

Pending advice letters that revise the same tariff sheets: None

**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 Ave.,**

**San Francisco, CA 94102**

**EDTariffUnit@cpuc.ca.gov**

**San Diego Gas & Electric**

**Attention: Megan Caulson**

**8330 Century Park Ct, Room 32C**

**San Diego, CA 92123**

**mcaulson@semprautilities.com**

General Order No. 96-B  
ADVICE LETTER FILING MAILING LIST

cc: (w/enclosures)

Public Utilities Commission

DRA

Y. Schmidt

W. Scott

Energy Division

P. Clanon

S. Gallagher

H. Gatchalian

D. Lafrenz

M. Salinas

CA. Energy Commission

F. DeLeon

R. Tavares

Alcantar & Kahl LLP

K. Harteloo

American Energy Institute

C. King

APS Energy Services

J. Schenk

BP Energy Company

J. Zaiontz

Barkovich & Yap, Inc.

B. Barkovich

Bartle Wells Associates

R. Schmidt

Braun & Blaising, P.C.

S. Blaising

California Energy Markets

S. O'Donnell

C. Sweet

California Farm Bureau Federation

K. Mills

California Wind Energy

N. Rader

CCSE

S. Freedman

J. Porter

Children's Hospital & Health Center

T. Jacoby

City of Chula Vista

M. Meacham

E. Hull

City of Poway

R. Willcox

City of San Diego

J. Cervantes

G. Lonergan

M. Valerio

Commerce Energy Group

V. Gan

Constellation New Energy

W. Chen

CP Kelco

A. Friedl

Davis Wright Tremaine, LLP

E. O'Neill

J. Pau

Dept. of General Services

H. Nanjo

M. Clark

Douglass & Liddell

D. Douglass

D. Liddell

G. Klatt

Duke Energy North America

M. Gillette

Dynegy, Inc.

J. Paul

Ellison Schneider & Harris LLP

E. Janssen

Energy Policy Initiatives Center (USD)

S. Anders

Energy Price Solutions

A. Scott

Energy Strategies, Inc.

K. Campbell

M. Scanlan

Goodin, MacBride, Squeri, Ritchie & Day

B. Cragg

J. Heather Patrick

J. Squeri

Goodrich Aerostructures Group

M. Harrington

Hanna and Morton LLP

N. Pedersen

Itsa-North America

L. Belew

J.B.S. Energy

J. Nahigian

Luce, Forward, Hamilton & Scripps LLP

J. Leslie

Manatt, Phelps & Phillips LLP

D. Huard

R. Keen

Matthew V. Brady & Associates

M. Brady

Modesto Irrigation District

C. Mayer

Morrison & Foerster LLP

P. Hanschen

MRW & Associates

D. Richardson

OnGrid Solar

Andy Black

Pacific Gas & Electric Co.

J. Clark

M. Huffman

S. Lawrie

E. Lucha

Pacific Utility Audit, Inc.

E. Kelly

R. W. Beck, Inc.

C. Elder

School Project for Utility Rate Reduction

M. Rochman

Shute, Mihaly & Weinberger LLP

O. Armi

Solar Turbines

F. Chiang

Sutherland Asbill & Brennan LLP

K. McCrea

Southern California Edison Co.

M. Alexander

K. Cini

K. Gansecki

H. Romero

TransCanada

R. Hunter

D. White

TURN

M. Florio

M. Hawiger

UCAN

M. Shames

U.S. Dept. of the Navy

K. Davoodi

N. Furuta

L. DeLacruz

Utility Specialists, Southwest, Inc.

D. Koser

Western Manufactured Housing

Communities Association

S. Dey

White & Case LLP

L. Cottle

Interested Parties

A.11-07-008

A.12-11-003

R.08-12-009

**Advice 2656-E**  
**(San Diego Gas & Electric ID U 902-E)**

**Advice 4516-E**  
**(Pacific Gas and Electric Company ID U 39 E)**

**Advice 3115-E**  
**(Southern California Edison Company ID U 338 E)**

## ATTACHMENT A

Updated CES-21 Proposed Research and Development Project Business Cases

# California Energy Systems for the 21<sup>st</sup> Century

## *Flexibility Metrics and Standards*

### **Proposed Research Project Business Case**

#### **1. Executive Summary**

##### **a) Context of the Flexibility Metrics and Standards project within CES-21:**

The CES-21 Flexibility Metrics and Standards project is a public-private collaborative research and development project between PG&E, SDG&E, and Lawrence Livermore National Laboratory (LLNL). The objective of the CES-21 Flexibility Metrics and Standards project is to apply computationally-based and other problem solving resources to the emerging challenges of the 21st century electric system of California. The CES-21 Program will utilize a joint team of technical experts from the Utilities and Lawrence Livermore National Laboratory (LLNL) who will combine data integration with advanced modeling, simulation, and analytical tools to provide problem solving and planning necessary to achieve California's ambitious energy and environmental goals for the 21st century.

CES-21 proposals will leverage a Cooperative Research and Development Agreement (CRADA) between the three California Investor Owned Utilities (IOUs) and LLNL. These organizations will partner with other DOE national laboratories and California universities to achieve CES-21 program goals through individual business cases.

##### **b) Research Project Opportunity Statement:**

New operating flexibility metrics are needed for long-term resource planning in California. Improvements to methodology and existing models, or new models, are also needed to reduce the cost, and/or the uncertainty about the resource adequacy of planned resources, to integrate greater amounts of intermittent renewables. Improvements to methodology and models are also needed to facilitate the consideration and decision making in regulatory and stakeholder processes of planning issues related to the integration of renewable resources, including: (1) quantification of system operating requirements, (2) estimates of the contribution of different resources to meet those requirements, (3) quantification of system residual need for resources, and (4) evaluation of the cost-effectiveness of resource alternatives with different operating attributes to meet residual system needs.

Traditional resource planning methods have used reserve margin metrics and standards, expressed as the expected frequency of Stage 3 events<sup>1</sup>, or as a planning reserve margin (PRM), to ensure that enough capacity is procured and available for operating the system. In the past, because of the small amounts of renewables in the system, the uncertainty and intermittency of generation like wind and solar was dwarfed by the uncertainty in electric load. Also, in the past, conventional resource additions provided the operating flexibility required by the uncertainty and intermittency of electric load.

Today, California has an aggressive green energy plan, built around renewable resources and other preferred resources that offer little or no operating flexibility. The uncertainty and intermittency of renewable generation require the system to be more flexible than it is today. As a result, past planning and operating metrics and standards need to be updated to incorporate the increased need for operating flexibility with greater amounts of intermittent generation.

This project proposes to:

- Review and critique existing flexibility metrics and tools now in use and under development by the utilities, CAISO, and others to quantify operating flexibility requirements and the residual resource needs not met by existing or already planned resources.
- Define new flexibility metrics, potentially novel ones, such as insufficient ramping capacity, that a system requires to balance loads and resources during different time intervals.
- Identify how to operationalize the flexibility metrics for long-term planning purposes, either as separate metrics or combined with existing reliability metrics, such as loss of load expectation (LOLE) or PRM requirement.
- Recommend whether new operating flexibility standards or modified reliability standards should be adopted to incorporate the increased need for operating flexibility with greater amounts of intermittent generation.
- Develop prototype new models or improvements to existing resource planning models that incorporate the proposed flexibility metrics with traditional production simulation and reliability models for use in evaluating the cost-effectiveness of different alternatives to meet identified system needs.

---

<sup>1</sup> Stage 3 is initiated by the CAISO when operating reserves are forecasted to be less than 3 percent.  
See: <http://www.caiso.com/Documents/EmergencyFactSheet.pdf>

**c) Utility Sponsors:**

- PG&E                       SCE                       SDG&E

SCE is placing its highest priority on addressing utility cyber security issues. As such, SCE will not be supporting or allocating resources to the Flexibility Metrics and Standards project.

**d) This research maps to the following value chain categories:**

- Grid operations/market design
- Generation
- Transmission
- Distribution
- Demand side management
- Cyber Security

**e) Potential Customer Benefits:**

This project is expected to ultimately help:

- Reduce operating and capital costs.
- Improve reliability by reducing the uncertainty about the adequacy of planned resource to integrate greater amounts of intermittent renewables.
- Improve the efficient consideration in regulatory and stakeholder forums of planning issues related to the integration of renewable, including: (1) quantification of system operating requirements, (2) estimates of the contribution of different resources to meet those requirements, (3) quantification of system residual need for resources, and (4) evaluation of the cost-effectiveness of resources alternatives, including different operating flexibility policies or standards, with different operating attributes to meet residual system needs.

Since there is no universally adopted methodology or metrics to measure a system’s operating flexibility, or to determine how much operating flexibility a system should have, the above potential benefits would be realized after the results from this research project are adopted and incorporated into operating practices and investment decisions. These benefits may depend on actions by regulatory and/or governing bodies to be fully realized.

**f) Research Challenges and Hurdles to Overcome:**

There is no consensus in the industry as to:

- How to measure operating flexibility.
- The types of operating flexibility a system with large amounts of intermittent generation requires to balance loads and resources.

- How operating flexibility requirements change as a function of the operating characteristics of its loads and resources.
- How to express the required operating flexibility in the context of existing planning and reliability metrics and standards used today.
- The contribution of existing and new resources to meet the system operating requirements, including demand response and energy storage.
- How to best determine the residual resource need, or the cost-effectiveness of resources with different operating attributes to meet those needs.

**g) Unique Capabilities Offered by LLNL:**

Developing a solution to these issues requires the formulation of metrics to guide operational decision-making, statistical analysis of the frequency and magnitude of ramping conditions, and the development of algorithms to operate the system taking into account the forecasts of ramping conditions. LLNL has developed extensive capabilities in the probabilistic forecasting of atmospheric conditions that will be the basis for applying the metrics and algorithms. LLNL has also been at the forefront of deploying stochastic unit commitment models and works closely with Energy Exemplar in the further development of such models. For example, LLNL recently concluded this November 2013 a study for the California Energy Commission to analyze the value of energy storage and demand response for renewable integration in California. LLNL has also established research relationships with the Power Systems Engineering Research Consortium (PSERC), IBM, Energy Exemplar (Plexos developers), UC Berkeley, Princeton, and others. This provides an environment for development and deployment of advanced models and solution algorithms for grid management. In addition, the research will leverage over five decades of experience with high performance computing platforms and the associated ecosystem that supports them.

The problem requires a wide range of analysis capabilities including formulation of metrics, atmospheric modeling and operational modeling and decision-making. Substantial computational power is required to support these activities. This wide range of capabilities can be found with LLNL and its potential partners. As per the table below, alternate approaches will not achieve the goals of this proposal.

Alternatives	Assessment
Private consultants and power system software vendors	Generally have limited computational capability to evaluate alternative approaches



Alternatives	Assessment
Universities	Usually cannot cover the range of capabilities needs, although the project expects to partner for specific requirements
Other National Laboratories	Do not have the combination of a wide range of atmospheric modeling, high performance computing, electricity production cost modeling, and experience in decision and operational modeling

**h) Third Party Partnerships and solicitations:**

Some aspects of this effort may be best performed by other parties. LLNL will seek partnerships with such parties according the standard operating procedures, including sole source and competitive solicitation, according the specific needs and market analysis.

**i) Duplication and synergies:**

This project has undergone preliminary due diligence to ensure no undue duplication of research with other CES-21 projects, IOU and CEC EPIC projects, and any other efforts.<sup>2</sup> The project team also intends to leverage related research and monitor new developments in this area to take advantage of potential synergies with other research initiatives.

**2. Proposal Description**

**a) Background**

Today, California’s electric grid uses LOLE or PRM as reliability metrics. These metrics have corresponding standards or standards that serve as guidelines for electric resource planning.

Current reliability metrics and standards were developed for an electric grid that did not have as much non-dispatchable and intermittent resources as the future grid envisioned by California’s Clean Energy Plan. The metrics that have historically been used to monitor and ensure a stable grid operation were designed in a different era that do not capture the range and diversity of available control mechanisms that would be present on the grid of the future, nor do they capture the inherent uncertainty and variability of new intermittent generation sources and load changes. Thus metrics that capture this and provide a broader scope of control options are needed.

---

<sup>2</sup> A letter dated January 21, 2014 from the California Energy Commission to Pacific Gas and Electric Company states that this business case has been reviewed and there is no duplication of effort.

There may be no simple “one size fits all” capacity level such as a PRM level, but instead a relationship or ratio between the amount of flexible capacity available to a system and the degree of variability and forecast uncertainty of that system’s combined load and intermittent generation. Alternatively, it may be possible to express flexibility needs as a portion of the overall generation fleet. As a result, there is a need to update planning criteria, not only to integrate intermittent renewables. There is also a potential for greater volatility of demand due to distributed photovoltaic generation, price-sensitive customers using “smart meters”, as well as potential for flexibility benefits from price-sensitive customers that should be considered.

The need for operationally flexible capacity (supply or demand-side) will depend on the characteristics of the electricity portfolio, including:

- System inertia available to the system, which affect the import levels into California.
- Variability and forecast uncertainty of electricity demand and variable electricity supplies.
- Correlation between variability of demand and supply.
- The availability of exiting flexible generation able to balance loads and resources continuously.

Today, CAISO and the utilities use off-the-shelf production simulation models to test the adequacy of the system to meet traditional operating reliability and new flexibility requirements under a given scenario. If resources are not adequate, the model estimates resource deficiencies, and after a trial and error process estimates the amount of conventional resources needed to clear resource deficiencies. Because simulations are time consuming, a day or more is needed to evaluate a single weather scenario for a single year. As a result, system analyses are often limited to single weather conditions and few load and resource scenarios, rather than performing a stochastic simulation to properly account for reliability risks. In addition, modeling simplifications are made (such as use of hourly granularity instead of one-minute or five-minute granularity), which may result in an inadequate representation of actual system flexibility needs.

In Track 2 of the CPUC 2012 long-term procurement plan proceeding, the CAISO investigated the need for resources for several scenarios adopted by the CPUC

for this proceeding, and found a need for as much as 5,378 MW of capacity in 2022.<sup>3</sup> Track 2 was intended to determine the system's flexibility needs. After opening a new Track 4 in the 2012 LTPP to study the need for resources created by the closure of the San Onofre Nuclear Generating Station (SONGS), and considering indications that system flexibility needs may be low or non-existent depending on the level of local capacity procurement authorized in the new Track 4, the CPUC decided to cancel or defer further consideration of system flexibility needs until the next LTPP cycle expected to start 2014.<sup>4</sup> Although CAISO, with the assistance of Energy+Environmental Economics, Inc. (E3), and others, and Southern California Edison Company have invested considerable time and effort developing new approaches to estimate the residual need for flexible resources, these approaches require further examination and development before the methodology and models built based on these approaches is accepted by parties in the next LTPP cycle and similar forums.

Similar efforts are under way or needed to define continued enhancements to resource adequacy (RA) requirements, including definition of rules for counting the contribution of resources for flexible and non-flexible or generic RA.<sup>5</sup> CAISO has also a parallel Flexible Resource Adequacy Criteria and Must-Offer Obligation initiative intended to implement the recently adopted flexible capacity requirements in the CPUC's June 2013 RA decision, while creating opportunities for all types of flexible capacity, including demand response, storage, and renewable resources to contribute to meet flexible capacity requirements. Those efforts unfortunately lack an agreed or adopted quantitative framework for measuring the contribution of resources (supply or demand-side resource) towards RA requirements.

## **b) Objective**

This project will define new operating flexibility metrics and standards based on a probability measure of the occurrence, the magnitude, and the duration of ramping shortages at different time intervals. These metrics will be applied using production simulation and reliability models of the California system to determine their robustness under a wide range of realistic scenarios of weather conditions, and loads and renewable generation scenarios.

---

<sup>3</sup> Upward ancillary service and load following shortage in the Replicating Transmission Planning Scenario. See CAISO's Deterministic Operational Flexibility Modeling Results.

<sup>4</sup> Assigned Commissioner and Administrative Law Judge's ruling dated September 16, 2013.

<sup>5</sup> CPUC's Energy Division draft proposal to develop Qualifying Capacity (QC) and Effective Flexible Capacity (EFC) methodologies for energy storage (ES) and supply-side demand response (DR) resources dated September 16, 2013.

The ability to meet upward and downward ramping requirements depends on the state of the generators at the time the ramp occurs (i.e., generator is online or committed and likely to be online when needed, and has the ability to ramp up or down given its expected operating level at the time flexibility is needed). The generator state, in turn, depends on the quality of forecasts information used for unit commitment and the dispatching procedures during the day.

### **c) Expected results**

This project will develop new metrics to measure the probability that the system will be unable to ramp up and down quickly enough to meet the ramping events that are possible with high levels of renewables. If properly constructed and employed, such a metric could be used to assess the system's adequacy, and to provide insight as to the most efficient approaches to improving the system's ability to meet ramping events.

This project proposes to:

- Review and critique existing flexibility metrics and tools now in use and under development by the utilities, CAISO, and others to quantify operating flexibility requirements and the residual resource needs not met by existing or already planned resources.
- Define new flexibility metrics, potentially novel ones, such as insufficient ramping capacity, that a system requires to balance loads and resources during different time intervals.
- Recommend whether new operating flexibility standards or modified reliability standards should be adopted to incorporate the increased need for operating flexibility with greater amounts of intermittent generation.
- Identify how to operationalize the flexibility metrics for long-term planning purposes, either as separate metrics or combined with existing reliability metrics, such as LOLE or PRM requirement.
- Develop prototype new models or improvements to existing resource planning models that incorporate the proposed flexibility metrics with traditional production simulation and reliability models for use in evaluating the cost-effectiveness of different alternatives to meet identified system needs.

## **3. Market Research**

### **CAISO Stochastic Model**

In addition to running Plexos production simulations for individual load and resource scenarios, the California ISO has developed a stochastic simulation model

to measure the probability of upward ramping deficiencies over ten- and twenty-minute time horizons using the uncertainty embedded in hourly inputs used for Plexos simulation, including loads, wind, solar and hydro generation, unit outages and intra-hourly flexibility requirements (regulation and load following). The model has no unit commitment or chronological constraints. The model uses a single period of time where the conditions are similar in all hours of the period. The model considers only a single weather year since it relies on Plexos inputs for that weather year. It is not clear whether the model can measure other flexibility metrics for different time intervals or for downward direction.

A simulation is done over those random variables, and for each hour, generation is dispatched to meet the load and ramp. Inability to meet a ramping requirement is computed for each scenario in the simulation, thereby producing an expected MWh ramping shortfall.

### **The University College Dublin's Flexibility Metric**

A group of academics at the University College Dublin have been working on designing flexibility metrics for power systems [Mark O'Malley et al]. This group has prepared a paper and a prototype model based on conversations PG&E has had with the group. The group is also working with another metric that addresses the shortcomings of the initial metric (such as not differentiating ramping deficiencies at different times during the day). The new metric takes a given fixed unit commitment schedule and computes the probability of not having enough flexibility over different time horizons. It accounts for the flexibility of units operating. However, it does not account for random forced outages. The prototype model is set up with flexibility source and sink nodes (representing intermittent generation and load on one hand, and flexible generators on the other) with a transmission system linking them. The Dublin group has limited resources and time to further develop flexibility metrics and build a fully operational model.

### **E3's simplified simulation model**

E3 has recently developed a new model called REFLEX to estimate resource need first relative to a traditional 1-day-in -10 year loss of load metric and second after considering flexibility requirements expressed as "endogenous<sup>6</sup>" cost inputs that allows the model to consider flexibility costs in its economic commitment and dispatch. This is in contrast to an "exogenous" modeling of ramping proposed by the Dublin group. E3 only models California and does not account for transmission

---

<sup>6</sup> Endogenous in the sense that all of the unit commitment and dispatch decisions (variables and constraints, if you prefer) are included in the same low-level optimization model with the modeling of the flexibility metric.

limitations between northern and southern California. E3 uses historical distributions of ramping from other transmission areas to model flows into and out of California. This is one of the simplifications of the model – compare this to the WECC-wide simulations models used today. A similar approach is used for hydro. Historical actual upward ramping and downward ramping distributions are used, and a point on those distributions is assumed as being available from hydro.

To simulate load, wind and solar and model the coupling between them, E3 groups the historical data into months, and then into low and high load days. Load is further grouped into working weekdays vs. weekends and NERC holidays. E3’s model draws 24-hourly load, and wind and solar generation during the simulation, drawing from consistent bins (same month, and all three load, wind, and solar from either the high load or the low load bucket). The “high load” bin is smaller than the “low load” bin, so that the more extreme events are matched together. The flexibility is modeled by E3 as a convex function computed outside of the optimization and then approximated and incorporated into the optimization.

#### **EPRI**

The Electric Power Research Institute (EPRI) also has several ongoing projects related to system flexibility. The primary project is an effort to develop industry-wide standard flexibility metrics for planning purposes as well as tools which streamline the application of those metrics. While several general metrics and tools have been developed, the process of developing industry-consensus and applying these metrics in specific planning contexts is just beginning. Other EPRI projects seek to understand the ability of various resources and market designs to provide flexibility.

This project will consider the above and other new approaches to incorporate operating flexibility in commitment and dispatch decisions, and select an approach based on a preselected criteria, including accuracy and timely of results.

### **4. Research Approach Assessment**

<b>Challenge</b>	<b>Assessment</b>	<b>Reason</b>
Meaningful definition of metrics that cover all circumstances of concern and are useful for operations	Medium	Progress has been made already. If more complex metrics are required, they can be accounted for in the operational modeling
Coupling the metric(s) with the day-ahead dispatch in base model	Medium	If necessary, iterative methods of computing robust solutions can be developed using parallel computing

Challenge	Assessment	Reason
Evaluating the practicality and usefulness of new operating flexibility standards to guide the planning of new resources	Medium	Flexibility standards require evaluating the trade-offs between the cost of acquiring additional flexibility for the system, and the cost or risks associated with not having sufficient flexibility

## 5. Research Team and Partnership Opportunities

Position	Name (organization)	Email
IOU Sponsor	Antonio Alvarez (PG&E)	<a href="mailto:aja6@pge.com">aja6@pge.com</a>
Research Director	Tom Edmunds (LLNL)	<a href="mailto:edmunds2@llnl.gov">edmunds2@llnl.gov</a>

Potential Partner	Reason for Partnering
Princeton University	Princeton's Castle Lab has developed sampling methods for identifying robust operational decisions by sampling multiple future states and accounting for possible future decisions. These are amenable to parallel computing
E3	Simplifications made by E3 can be reviewed and improved, and new capabilities added such as incorporating transmission constraints and improving the representation of certain inputs.
Astrape Consulting	Astrape Consulting developed a hybrid resource adequacy and production cost model named the Strategic Energy and Risk Valuation Model (SERVM) that stochastically simulates unit performance, weather conditions, load growth uncertainty, and resource outages.
EPRI	Research will expedite the timeline planned to deliver new metrics and models now planned by EPRI for completion in 3 to 4 years
University College, Dublin	Has conducted research on similar problems.

## 6. Implementation Plan and Schedule

### a) Work plan

This project will define the objectives and the requirements for flexibility metrics. Several candidate mathematical forms will be developed along with proposed algorithms or methods for computing the metrics. The approaches may be analytic or simulation based. Analytic approaches combine the statistics over rates and duration of load ramps, with the statistics over available ramping capability to estimate the probability that the required ramp rates exceed the available ramping capacity. Simulation approaches will test a series of days (over

several years) with statistically valid forecasts, and generator dispatch scenarios to directly observe the frequency of insufficient ramping.

As recognized by the Commission in E-4677, the project's workplan described below will be modified in Phase 1 to take advantage of the findings from PG&E's Collaborative Model Review effort<sup>7</sup> and not spend unnecessary time or project funds on redoing work performed in that Collaborative Model Review. Reports containing an updated workplan will clearly identify which aspects of PG&E's Collaborative Model Review have informed the project. The tasks and schedule described for the following phases are subject to change based on lessons learned, new information, and other non-duplication research.

### **Phase 1: Define problem and characteristics of tools needed to address the problem (PM1-2)**

In this first phase, the project will define the problem and review methodologies and analytical tools that could be used to solve the problem. The purpose of this initial step is to develop a clear description of the analytical framework that will be used to design a methodological and modeling approach to design flexibility metrics. Traditional reliability modeling addresses the analytical question regarding the amount of capacity that satisfies a reliability target such as a one day in 10 years outage expectation or that equalizes the cost of adding new generation resources with the corresponding reduction in outage costs. This question is addressed in a stochastic environment where shortfalls in available generating capacity relative to customer load are assessed based on distributions of weather conditions driving customer loads and generating unit unavailability. In a generating system in which there is a substantial risk of customer outages or equipment damage due to insufficient operating flexibility to balance loads and resources (even when there is enough capacity overall), resource expansion questions need to consider not only capacity shortfalls and but also operating flexibility shortfalls such as insufficiently ramping up and down capability to balance loads and resources, as well as the cost of meeting these shortfalls with changes in unit commitment or dispatch, or operating flexibility policies or standards. The question of what operating flexibility metrics and standards to use for planning will be addressed in a stochastic environment that additionally considers the weather uncertainty affecting loads and intermittent resources.

---

<sup>7</sup> The Collaborative Model Review was an effort by PG&E and several other parties to improve the understanding of resource planning models under development or previously used in California to answer questions about system reliability and operating flexibility needs. A copy of the collaborative report provided to the Administrative Law Judge and all parties of the 2014 LTPP proceedings can be found at: [http://www.cpuc.ca.gov/NR/rdonlyres/ECE43E97-26E4-45B7-AAF9-1F17B7B77BCE/0/CombinedLongTermProcure2014OIR\\_Report\\_CollaborativeReview.pdf](http://www.cpuc.ca.gov/NR/rdonlyres/ECE43E97-26E4-45B7-AAF9-1F17B7B77BCE/0/CombinedLongTermProcure2014OIR_Report_CollaborativeReview.pdf)



### **Major tasks:**

- 1) (IOU, LLNL) Gather and analyze pertinent data.
- 2) (IOU, LLNL) Decide characteristics of methodology and analytical tools needed to solve the problem.
- 3) (IOU, LLNL) Determine if and how to incorporate findings from current efforts in flexibility (SCE study, CAISO/E3, and others as applicable.)

### **Phase 2: Select a base model (PM1-4)**

Based on the characteristics identified in the prior phase, select a base model. In this phase the project will review and critique existing flexibility metrics and tools now in use and under development by the utilities, CAISO, and others to identify gaps or shortfalls in metrics. For purposes of providing a cost estimate, we will assume Plexos is the base model, given CAISO and IOU experience with the model and LLNL's past use of Plexos for its probabilistic analysis of demand response and energy storage for the CEC completed in 2013. The base model may change depending upon the results of Phase 1. However, for purposes of planning the phases below, and estimating the project's cost, we assume this project uses Plexos and builds on the work done by LLNL for the CEC

### **Major tasks:**

- 1) (IOU, LLNL, CAISO, consultant) Review and critique existing flexibility metrics and tools now in use and under development in consultation with CAISO and model vendors.
- 2) (IOU, LLNL, CAISO, consultant) Select base model in consultation with CAISO.

### **Phase 3: Develop the infrastructure to generate multiple weather dependent data (load, hydro, wind, solar) (PM1-11)**

Due to budget considerations, the project will leverage LLNL's previous work for the CEC and use the Weather Research and Forecasting (WRF) model to reproduce a range of temperature, wind and solar conditions prevailing in California and the Western Electricity Coordinating Council (WECC) for 30 scenarios to build 6 weather ensembles for each of two different weather years. A third weather year will be included if resources allow. Leveraging LLNL's scripts already developed for the CEC project, weather parameters for these scenarios will be used to generate load, wind and solar generation for Plexos simulations. Load and intermittent generation would have 5-minute interval inputs for Plexos.

### **Major tasks:**

- 1) (LLNL) Develop the infrastructure and generate multiple weather dependent data for 6 weather ensembles for up to three different weather years.

#### **Phase 4: Develop the infrastructure to automate the running of many scenarios in batch mode through the optimizer (PM5-7)**

Set up model so it can be run in batch mode with dozens of predefined scenarios. Use this to produce several scenarios that can be analyzed manually, and in the future by using the prototype code developed in later phases of the project, and used to begin gaining insight into what a long term procurement plan should look like. Develop methods to automate storage of the results into a database or other convenient form for subsequent analysis. Due to budget considerations, the project will leverage the team's experience and run the weather scenarios in Plexos. The scenarios will be then aggregated and weighted based on the weight assumed for each weather year. Plexos will perform a day-ahead unit commitment and 5 minute economic dispatch. Instead of using a stochastic unit commitment considering the 30 weather scenarios available for an hour of a weather year, each of the 30 scenarios will be run separately considering Monte Carlo outages and operating flexibility requirements calculated based on the uncertainty represented by the 30 scenarios in a weather year.

##### **Major tasks:**

- 1) (LLNL) Set up selected model; gather test data.
- 2) (LLNL) Develop code to speed up run time and manage storage inputs/output.

#### **Phase 5: Develop Candidate Flexibility Metrics (PM1-10)**

Based on the previous phase's results, the appropriate models and simulation codes will be developed or extended – leveraging existing products whenever possible. Methods will help determine which metrics can best communicate the system's flexibility requirements, and how the metrics can then be adjusted or changed as necessary in the future as the system changes.

In this phase, the project will review prior flexibility metrics used by CAISO, utilities and others to represent the flexibility requirements of the system that need to be considered for commitment and dispatch purposes. Two flexibility metrics will be used and tracked: Net Load Following and Net Load Ramping, as explained below.

##### **Major tasks:**

- 1) (IOU, LLNL) Develop a prototype Net Load Following metric in consultation with CAISO. This metric would define the additional flexible capacity that the system needs to respond to variability and forecast uncertainty of net load within the operating day (intra-day and intra-hourly), which is not already covered by the Frequency Response or Regulation metrics. This load following metric would identify needs for flexible capacity that can be re-dispatched or

started within minutes to manage the remaining operating variability and forecast uncertainty not covered by frequency and AGC responsive capacity. Sources of flexible capacity to satisfy a selected load following standard will also include supply- and demand-side alternatives.

- 2) (IOU, LLNL) Develop a prototype Net Load Ramping metric in consultation with CAISO. This metric would define the additional flexible capacity that the system needs to balance a forecasted net load for the operating day or a commitment period, which is not already covered by the Frequency Response, Regulation metrics, or Net Load Following metrics, which are intended to measure the intra-hour variability and forecast uncertainty from day-ahead or commitment times.

#### **Phase 6: Develop a prototype model to calculate flexibility metrics (PM11-13)**

The prototype model is stand-alone code intended to calculate the supply and demand for flexibility for the selected metrics, the expected deficiencies and probability of deficiencies of flexible capacity. In this phase, the code will track and calculate the flexibility metric deficiencies, but will not yet be integrated with the unit-commitment and dispatch model.

The inputs to the metrics prototype are: (1) the unit commitment and dispatch coming out of a Plexos run, showing the available flexible capacity to meet the flexibility requirements at different time intervals (say every hour or 15 minutes) for different time horizons (e.g., 5 min, 15 min, 1 hour, 2 hours, etc.), and (2) the distribution of loads and intermittent generation at the end of each time horizon for each of the 30 weather paths considered in each weather year from which the demand for flexibility is calculated for each time horizon.

The output is the expected amount of various types of “flexibility not served” in MW per hour considering the 30 weather scenarios, and the probability of any flexibility not being served. Both upward and downward flexibility metrics will be calculated for various assumed flexibility standards to inform a future development of flexibility standards.

#### **Major tasks:**

- 1) (LLNL, consultant or model vendor) Develop code to calculate flexibility metrics, and benchmark flexibility metrics calculated from existing reduced order models developed by current efforts (SCE study, CAISO/E3, and others as applicable).

#### **Phase 7: Integrate the flexibility metric prototype with the base model (PM12-16)**

Initially, we anticipate an iterative process using LLNL’s HPC with a separate code that: 1) takes the inputs from the unit commitment and dispatch model and from the flexibility metric prototype model developed in prior phases, and

2) decides whether to change the unit commitment and dispatch to minimize costs after satisfying the flexibility standards given the marginal cost of flexibility.

The ultimate goal is to integrate the selected flexibility metrics and standards into a larger optimization which can be solved on workstations used by the utilities, CAISO and other parties in 4 hours per weather year. The project will suggest ways to reduce run such as: 1) clustering the 30 weather scenarios into 6 scenarios, as LLNL did for the CEC Project, 2) simplifying the representation of the system without losing significant accuracy, and 3) running and archiving cases off-line that support interpolation routines.

**Major tasks:**

- 1) (LLNL, consultant or model vendor) Integrate the flexibility metric prototype.

**Phase 8: Test and evaluate the results from the three-model integrated optimization (PM17-18)**

In this phase, the results from the integrated optimization will be tested and evaluated. Further adjustments to the code may be necessary as part of this phase. As a first step in validation we will run the new flexibility metrics on two very different grid configurations (e.g. different amounts of non-dispatchable generation). The metrics should reveal this difference. For the purposes of this project, evaluation criteria will be qualitative. Additionally, the project will develop an approach for conducting more rigorous quantitative validation, including metrics sensitivity to inputs. As with any research project, unforeseen obstacles and unexpected results may arise. Any significant changes in direction, scope, timeline, or budget will be handled according to established CES-21 practices.

**Major tasks:**

- 1) (IOU, LLNL, consultant or model vendor) Select or build grid test case scenarios/models.
- 2) (IOU, LLNL, consultant or model vendor) Test and evaluate the results based on qualitative criteria.
- 3) (IOU, LLNL, consultant or model vendor) Develop approach for quantitative validation and sensitivity analyses.

**Phase 9: Document the model (PM12-18)**

**Major tasks:**

- 1) (IOU, LLNL, consultant or model vendor) Document new or improved model. Documentation will be developed as prototype versions are developed and tested, and assembled into a single document for users in the last 2 months of the project.

## b) Milestones/Deliverables

Phase	Type	Description	Due Date	Responsible
1	Milestone	Define problem and characteristics of needed tools	PM 2	IOU, LLNL
2	Milestone	Select Base Model	PM 4	IOU, LLNL
3	Deliverable	Software infrastructure to generate multiple weather dependent data (load, hydro, wind, solar) to input into selected base model (prototype code).	PM7	LLNL
4	Deliverable	Software infrastructure to automate the running of many scenarios in selected model (prototype code)	PM7	LLNL
5	Deliverable	Flexibility metrics report	PM10	IOU, LLNL
6	Deliverable	Software to calculate the expected amounts and probability of flexibility deficiencies (prototype code at LLNL)	PM13	LLNL
7	Deliverable	Software to optimize commitment and dispatch that integrates the flexibility metrics (prototype code)	PM16	LLNL
8	Milestone	Software tested and sample produced for agreed scenarios	PM18	LLNL, IOU
9	Deliverable	Final project report with model documentation and recommendations for future work	PM18	LLNL, IOU

## c) Resource requirements

The proposed project will require five persons with different levels of involvement for different times during the project's duration. This estimate includes individuals from LLNL, PG&E, and potential partner resources. These individuals will be supported by utility staff to the extent needed, also at various times during the duration of the project. The five individuals will include:

- Project lead
- Weather modeler
- Production simulation modeler
- Computer scientist
- Report writer/editor

## 7. Cost Estimate

The total budget for this Grid Integration Business Case estimated for an 18 month period is \$2,000,000, which is divided in six month periods and shown in the following table. Management administrative expenses will be limited to 10% of the total CES-21

budget and is spread over CES-21 management of MMATR and Grid Integration tasking. The Joint IOU Program Managers will move task dollars between years or into additional years as needed dependent on task completion. The PG&E and SDG&E Program Managers will seek CPUC approval if there is more than a 5% spending shift proposed between categories proposed in the MMATR or Grid Integration Business Cases as submitted in this Advice Letter.

Entity	PM1-6	PM7-12	PM13-18	Total (\$k)
LLNL and subcontract labor	500	550	800	1,850
Utility labor	50	50	50	150
Total	550	600	850	2,000

## 8. Benefits of Proposed Project

### d) Benefits estimate

If successful, with the adoption of flexibility metrics and standards by the CAISO and others for operating and investment decisions, this project will ultimately help:

- Reduce operating and capital costs.
- Improve reliability by reducing uncertainty about the adequacy of planned resource to integrate greater amounts of intermittent renewables.
- Improve the efficient consideration in regulatory and stakeholder forums of planning issues related to the integration of renewable, including: (1) quantification of system operating requirements, (2) estimates of the contribution of different resources to meet those requirements, (3) quantification of system residual need for resources, and (4) evaluation of the cost-effectiveness of resources alternatives, including different operating flexibility policies or standards, with different operating attributes to meet residual system needs.

Improving the accuracy of flexible resource need determination could result in substantial benefit to California electricity consumers. Improved understanding of flexibility needs may provide insight into the how to best take advantage of existing and new alternatives such as energy storage. Illustrative benefits for this project were quantified in the IOUs rebuttal testimony field in connection with the CES-21 application.<sup>8</sup>

---

<sup>8</sup> Decision 12-12-031, p. 2.

### **e) The proposed project may lead to technological advancement**

As a national energy policy leader, it is critically important for California to support cutting edge research and development (R&D) in the area of grid integration, particularly with respect to grid integration of renewable resources. This is an area for further investment in order to move from the current levels of renewable resource integration, to a much larger scale integration including the levels outlined in California's Renewable Portfolio Standard of 33% renewables integration by 2020.

Grid integration is a "cross cutting" research category that relates to electric resource planning and electric system operations, two of the four original research categories previously adopted in D.12-12-031. The challenges of grid integration, particularly with respect to grid integration of renewable resources, are widely recognized as an important research area for the state. In particular, in order to achieve important environmental goals, California's electric system is going through a significant transformation, replacing conventional generation with increasing amounts of intermittent renewable resources, and other resources that have limited operating flexibility.

While all of the research topics proposed by the utilities under the electric resource planning and electric system operations categories enable improved grid integration of renewable resources, the Flexibility Metrics and Standards project, as previously adopted, is an essential building block and is anticipated to provide benefits to customers through improved long term resource planning.

In light of the revised research funding cap established by SB 96, PG&E and SDG&E have narrowed the scope of the initially proposed Flexibility Metrics and Standards project. Specifically, the Flexibility Metrics and Standards project is intended to:

- Review and critique existing flexibility metrics and tools now in use and under development by the utilities, CAISO, and others to quantify operating flexibility requirements and the residual resource needs not met by existing or already planned resources.
- Define new flexibility metrics, potentially novel ones, such as insufficient ramping capacity, that a system requires to balance loads and resources during different time intervals.
- Recommend whether new operating flexibility standards or modified reliability standards should be adopted to incorporate the increased need for operating flexibility with greater amounts of intermittent generation.

- Identify how to operationalize the flexibility metrics for long-term planning purposes, either as separate metrics or combined with existing reliability metrics, such as LOLE or PRM requirement.
- Develop prototype new models or improvements to existing resource planning models that incorporate the proposed flexibility metrics with traditional production simulation and reliability models for use in evaluating the cost-effectiveness of different alternatives to meet identified system needs.

#### **f) The proposed projects may lead to potential breakthroughs in grid integration**

New operating flexibility metrics are needed for long-term resource planning in California. Improvements to methodologies and existing models, or new models, are also needed to reduce the cost and/or the uncertainty about the resource adequacy of planned resources to integrate greater amounts of intermittent renewables. Improvements to methodologies and models are also needed to facilitate the consideration and decision making in regulatory and stakeholder processes of planning issues related to the integration of renewable resources, including: (1) quantification of system operating requirements, (2) estimates of the contribution of different resources to meet those requirements, (3) quantification of system residual need for resources, and (4) evaluation of the cost-effectiveness of resources alternatives with different operating attributes to meet residual system needs.

Traditional resource planning methods have used reserve margin metrics and standards, expressed as a percentage of forecast electric demand, to ensure that enough capacity is procured and available for operating the system. In the past, because of the small amounts of renewables in the system, the uncertainty and intermittency of generation like wind and solar was dwarfed by the uncertainty in electric load. Also, in the past, conventional resource additions provided the operating flexibility required by the uncertainty and intermittency of electric load.

SB 96 requires the Commission to ensure that the research parameters reflect a new contribution to cyber security and grid integration and that there is not a duplication of research being done by other private and governmental entities. Although the California Independent System Operator, the California Energy Commission, and others, have invested in efforts to develop new stochastic approaches to estimate the residual need for flexible resources, these approaches require further examination and development before the



methodology and models built based on these approaches are ready for use in resource planning or policy decisions. In particular, this research project is targeting potential breakthroughs to determine:

- Weather uncertainty effects on customer load and renewable generation;
- The electric grid's operational flexibility requirements; and
- Operating limits of the existing or planned grid to integrate additional amounts of intermittent renewable generation
- Additional resources and cost to integrate additional renewable generation.

These breakthroughs would significantly enhance existing planning methodologies and models to facilitate the assessment and implementation of future energy policy initiatives and help achieve California's ambitious environmental goals.

# California Energy Systems for the 21st Century

## *Machine to Machine Automated Threat Response (MMATR)*

### **Proposed Research Project Business Case**

#### **1. Executive Summary**

##### **a) Context of MMATR within CES-21:**

The CES-21 MMATR project is a public-private collaborative research and development project between PG&E, SCE, SDG&E, and Lawrence Livermore National Laboratory (LLNL). The objective of the CES-21 MMATR project is to apply computationally-based and other problem solving resources to the emerging challenges of the 21st century electric system of California. The CES-21 Program will utilize a joint team of technical experts from the Utilities and Lawrence Livermore National Laboratory (LLNL) who will combine data integration with advanced modeling, simulation, and analytical tools to provide problem solving and planning necessary to achieve California's ambitious energy and environmental goals for the 21st century.

CES-21 proposals will leverage a Cooperative Research and Development Agreement (CRADA) between the three California Investor Owned Utilities (IOUs) and LLNL. These organizations will partner with other DOE national laboratories and California universities to achieve CES-21 program goals through individual business cases.

CES-21 program activities align with the energy sector's Roadmap to Achieve Energy Delivery Systems Cybersecurity (Roadmap, [www.controlsystemsroadmap.net](http://www.controlsystemsroadmap.net)). The Roadmap 2011 update was a collaborative effort that drew on the expertise of more than 80 public and private energy sector stakeholders. It presents a strategic framework and set of short, mid and long-term milestones with the vision that by 2020 resilient energy delivery systems are designed, installed, operated and maintained to survive a cyber-incident while sustaining critical functions.

The following graph shows the Electricity Sector Value Chain. CES-21 Cybersecurity will focus on the Industrial Control Systems (ICS) associated with the value chain and how and automated response to cyber threats will maintain the reliability of the value chain.

## Electricity Sector Value Chain



MMATR is applicable to SCADA systems that exist anywhere within the IOU's electrical value chain, that is electricity production, transmission and distribution control systems. The automated ICS data and associated remediation will enable the control systems to respond to threats quickly, ensuring the reliability of the grid for the end-users

### **b) MMATR Research Project Opportunity Statement:**

Cyber-attacks against critical infrastructure are increasing in frequency and sophistication at an alarming rate. Recent successful attacks on the energy sector such as those mounted against RAS-GAS, a Qatari gas firm, and Aramco, a Saudi oil firm, illustrate the point. State of the art technologies currently used to protect our critical infrastructure against such attacks are ill-equipped to deal with the advanced threats.

There is a fundamental difference between cyber-attacks against Information Systems and those against critical infrastructure. Attacks against Information Systems usually target the data and have the potential to impact business processes while attacks against critical infrastructure target control systems and have the potential to disrupt critical services and or destroy the infrastructure. Another marked difference is the speed with which these two types of attacks develop. Attacks against Information systems tend to be slow and may develop over long periods of time while attacks on the infrastructure may end relatively quickly. This distinction is important because it has implications as to how much time defenders have to react to the different kinds of attacks.

The proposed research is intended to develop automated response capabilities to protect critical infrastructure against cyber-attacks. Due to the time criticality of cyber-attacks, the only way to effectively protect the critical infrastructure is through these automated response capabilities.

This MMATR business case leverages the CES-21 CRADA between the three California IOUs and LLNL to develop advanced cyber technology and tools not currently commercially available. This advancement in cyber technology is expected to enable the IOUs to identify and take action on advanced cyber threats to their industrial control systems before they impact California’s critical infrastructure.

**c) Utility Sponsors:**

- PG&E                       SCE                       SDG&E

**d) This research maps to the following value chain categories:**

- Grid operations/market design
- Generation
- Transmission
- Distribution
- Demand side management
- Cyber Security

**e) Potential Customer Benefits:**

California customers will benefit greatly from avoided (or, shortened outages) due to cyber-attacks. Automated response capability will reduce the number of outages, minimize their impact, and improve recovery times.

Benefit Category	Benefit Description	Customer Benefit
<p><b>Develops Emerging Technology</b></p>	<p><b>Define and develop “forward looking” technology, strategies and tools.</b> In partnership with Lawrence Livermore Labs technologies will be developed that will improve cyber security processes and tools above those that are currently commercially available. Research and development of tools will focus on areas not expected to be served by the commercial sector in the near term. Modeling and simulation will be used to design more resilient networks and test proposed courses of action. These processes and tools will enable the California Utilities</p>	<p><b>Reduces the threat of system damage to critical infrastructure systems that could impact utility rates in California</b></p>

Benefit Category	Benefit Description	Customer Benefit
	to pursue moderate-risk/high-reward solutions to critical cyber security problems.	
<p><b>Improves Public Safety</b></p>	<p><b>Increase the security of California’s critical infrastructure.</b> This project aligns with the White House Comprehensive National Security Initiative to protect our nation’s infrastructure.</p> <p><i>In July 2012 President Obama wrote in the Wall Street Journal:</i></p> <p>Taking the Cyber-attack Threat Seriously          “It doesn't take much to imagine the consequences of a successful cyber-attack. In a future conflict, an adversary unable to match our military supremacy on the battlefield might seek to exploit our computer vulnerabilities here at home. Taking down vital banking systems could trigger a financial crisis. The lack of clean water or functioning hospitals could spark a public health emergency. And as we've seen in past blackouts, the loss of electricity can bring businesses, cities and entire regions to a standstill”.</p> <p>Successful penetration or disruption of the California electric grid will cause serious damage to national security and public safety.</p>	<p><b>Reduces the disruption of critical infrastructure services and negative impact to:</b></p> <ul style="list-style-type: none"> <li>• <b>California’s health &amp; human services</b></li> <li>• <b>Loss of revenue to California’s businesses</b></li> </ul>
<p><b>Develops Processes for Proactive Defense Against Cyber Threats</b></p>	<p><b>Create a line of defense against today’s advanced persistent threats</b> by enhancing shared situational awareness of network vulnerabilities, threats, and events to enable the California Utilities to act quickly to reduce vulnerabilities and prevent intrusion. Advanced threat analytics (using machine learning and other algorithmic techniques) and software analysis will be explored as possible foundations for new cybersecurity defensive technology.</p>	<p><b>Improves the responsiveness to cyber threats and reduces the disruption of critical infrastructure services in California</b></p>

Benefit Category	Benefit Description	Customer Benefit
<b>Build California Talent in Cyber Defense</b>	<b>Strengthen cybersecurity environment by expanding cyber education;</b> coordinating and redirecting research and development efforts across the California Utilities and working to define and develop strategies to deter hostile or malicious activity in cyberspace	<b>Leverages the cyber talent among the California Utilities that will reduce disruption of critical infrastructure services in California</b>
<b>Develops Processes to Plan for Emerging Threats</b>	<b>Define and develop enduring deterrence strategies and programs.</b> California Utilities have implemented traditional approaches to the cybersecurity problem. These measures have been effective in the current environment but need to transition to the next level of threat protection to protect California’s Critical Infrastructure. This Initiative will build a cyber defense strategy that will improve warning capabilities appropriate responses for both state and non-state actors.	<b>Improves the responsiveness to cyber threats and reduces the disruption of critical infrastructure services in California</b>

**f) Research Challenges and Hurdles to Overcome:**

The research challenges include:

- Current lack of integration between disparate systems
- Lack of automated response strategies
- Lack of standard nomenclature and semantics to describe indicators and responses
- Lack of research into interplay of complex responses (e.g. response to one threat may increase exposure to others)
- Lack of modeling and simulation tools for communications / power systems that scale to the state and national levels
- Automated response can be harmful in networks where situational awareness is inadequate. Mitigations will have to be studied.
- Decision logic for automated response is often not “one-size-fits-all”. A configurable logic engine within certain minimum security standards must be developed.
- Current lack of tools/techniques for identifying the advanced persistent threat (APT) in industrial control system (ICS) networks

### **g) Duplication and synergies:**

The CES-21 program has proactively coordinated with the Department of Energy's Cybersecurity for Energy Delivery Systems (CEDS) program, which also aligns R&D activities with the energy sector's Roadmap. While there is currently research underway in the energy sector that will develop automatic recognition of and response to cyber threats, further research in this area is needed due to the complexity and diversity of energy delivery system architectures, components and systems as well as the dynamic threat landscape. In the CES-21 Cyber team's research, current R&D specifically for Utilities, related to automated response to Cyber threats is in a state of rudimentary infancy. The CES-21 Cyber team will coordinate our efforts with others doing research in this area to negate the possibility of duplication. This research area is well-aligned with the strategic framework articulated in the energy sector's Roadmap.

Since delivery of the Advice Letter in April 2014 the Joint Utilities and LLNL have continued to monitor the Cybersecurity space for duplication with this business case. While there are some research areas that compliment MMATR research duplication of efforts have not been discovered. As requested in the Resolution LLNL has provided a letter in this Compliance Advice Letter stating that MMATR is a non-duplication of effort with other current R&D in the Utility Cybersecurity space.

Products are available (e.g. smart routers, switches and firewalls) that can accept and execute some of the response actions. This proposed research will evaluate and leverage these commercially available products where applicable.

## **2. Proposal Description**

### **a) Background**

The cyber security industry is making great strides in the areas of protection and detection capabilities. For example, government programs such as Einstein 1, 2, and 3, ADAMS, and CINDER promise to protect government information systems by improving situational awareness and improving detection and protection capabilities. However, for the most part, when it comes to reacting to attacks, these systems rely on alerting those under attack to take remedial action. Manual responses may be adequate for cyber-attacks against information systems and their data but manual responses to cyber-attacks against critical infrastructure may not be fast enough to keep attackers from damaging the critical infrastructure. What's needed is an automated response capability to protect the critical infrastructure against cyber-attacks.

The automated response capability would essentially mimic a military strategy developed by USAF Colonel John Boyd and applied to the combat operations process known as the OODA loop. According to Boyd, decision-making occurs in a recurring observe-orient-decide-act (OODA) loop. In combat, the opponent who can process this cycle quicker has the advantage. In cyber security as in war, the ability to observe and react to threats more rapidly than the attacker will significantly enhance the system's ability to survive an attack. The advancement in cyber technology will enable the IOUs to identify and take action on advanced cyber threats before they impact California's critical infrastructure.

## b) Objective

The objective is to conduct research leading to the development of automated response capabilities to protect critical infrastructure against cyber-attacks, specifically APTs. Due to the time criticality of these cyber-attacks, the only way to effectively protect the critical infrastructure will be through automated response capabilities. Automated responses may take the form of:

- Network segmentation, disconnection, or segregation
- Traffic shaping, routing and firewalling
- Session termination and resets
- Traffic and application whitelisting
- System quarantining or disconnection
- Component reboot/reload
- Implementation of other automated response strategies

Conceptually, armed with the proposed automated response capability, a critical infrastructure under attack would:

1. Become aware of the attack. The system would learn about the attack, as well as the type of attack, from sensors in its environment or external, capable of providing attack indicators.
2. Notify relevant sub networks and subsystems. Since the critical infrastructure is a system of systems, all information will need to flow to the pieces and fragments that can take the appropriate actions.
3. Select and perform an appropriate response. Decision logic on each system or component using the type of attack and the overall context, would select a response or responses that would improve its resilience to the attack while trying to maintain its basic operational functionality.
4. Continue to maintain situational awareness. Each component of the critical infrastructure is in a constant state of monitor - response to improve the overall chance of effectiveness.



There is much work to be done in order to make cybersecurity automated response capability a reality. Some of the major research efforts include:

- Integration of existing security solutions to improve situational awareness
- Adoption of standard lexicon and taxonomy to describe attacks
- Development and selection of appropriate response strategies
- Development of automated system parameter tuning to increase response effectiveness and reduce false positives
- Automated Response Capability product development

The proposed research includes plans to leverage work already underway at national laboratories and academia. Examples include: the Department of Energy's Cybersecurity Risk Information Sharing Program (CRISP) and Department of Energy's Cybersecurity for Energy Delivery Systems Program (CEDS), which has both R&D and operational components.

This project will incorporate a structured threat exchange language such as Structured Threat Information eXpression (STIX™) and a threat exchange service such as Trusted Automated eXchange of Indicator Information (TAXII™), both developed by the Department of Homeland Security and undergoing adoption by the ES-ISAC.

LLNL will provide leadership and will work with California technology companies to commercialize the research into useful products that enhance the survivability of California's critical electric utility infrastructure systems to cyber-attacks.

### **c) Expected results**

The result of this research can be envisioned as a threat-aware grid architecture capable of making real-time decisions to increase its survivability and resiliency. CES cybersecurity innovations and breakthroughs may include:

- An open architecture for distributed threat detection and automatic, localized response:
  - with status reporting to peers
  - permitting centralized maintenance.
  - aware of its environment and changes to it
  - providing forensically sound evidence collection and handling for the use of law enforcement and intelligence services.
  - including open and non-proprietary systems, algorithms, and workflows that provide a basis for a commercially viable prototype.

- Secure procedures and processes for the management, command, and control of ICS defenses.
- Standard descriptive semantics for threats, responses, infrastructure, and processes.
- Models of ICS systems within the California Utilities grid which are useful for further analyses.
- Recommended responses to threats and threat types.

### 3. Research Approach Assessment

Challenge	Assessment	Reason
Developing the language and semantics to describe indicators and their recognition	Likely to succeed	MITRE has already started on the synergistic Structured Threat Information Expression (STIX) and Trusted Automated Exchange of Indicator Information (TAXII) under direction from the DHS
Developing the suite of actions to be undertaken within the network to provide a level of resilience	Likely to succeed	There are a fixed number of things within the control of an intelligent process – this approach is an aggregation of existing capabilities
Developing the language and semantics to describe the actions to be taken, the sequencing and the priority	Likely to succeed	There are a number of systems that use If-Then rules to perform distributed functionality that can be leveraged
Detecting APT-type attacks on/within ICS networks	Challenging	ICS security has largely ignored APT-style attacks. The grid was not designed or built with this kind of threat in mind.
Simulating or modeling threats and response scenarios on a large, complex grid network	Challenging	Although pieces have been simulated nothing for the grid at the required scale has been attempted before
Deriving resiliency configurations based on attack scenarios	Challenging	The interplay between attacks scenarios and the combinatorics of possible actions to be taken may prove complex

### 4. Implementation Plan and Schedule

#### a) Work plan

##### 1. Use Case Generation

Develop R&D strategy for CES-21 overall and on a Spiral by Spiral development task level. This task will generate use cases for potential cyber security solutions to be developed in the CES-21 Cyber program. Project participants will meet with utility subject matter experts (SMEs) to learn about operational needs in cyber security, to learn about realities of operating the grid in a reliable and secure manner, and to solicit feedback on prototype technologies developed by the program.

These meetings will be frequent during program initiation and then occur on a regular basis throughout the remainder of the program.

## **2. Aggregate and Normalize Data**

The team will develop a comprehensive understanding of the IOU's ICS network architecture, devices on the network, and data available from network devices. Both IOU device catalogs and network mapping technology will be used to accomplish this. We will build a prototype data aggregator to collect ICS data pertinent to defending the network. Existing data models will be used where available and then extended or created to fill gaps. This task will continue at a low level throughout most of the project in order to stay current with new device and data types. Sensor usage within the Spiral development cycles will be part of the R&D use cases during later phases.

## **3. Modeling/Simulation**

We will start by defining a "Modeling/Simulation R&D Strategy" for the CES-21 Cyber program. Experts in modeling and simulation as well as IOU grid operators will team to determine what elements of modeling/simulation will be most beneficial to supporting other program tasks. Because modeling and simulation can be performed with many degrees of resolution (e.g. neighborhood, city, region, State of California) at varying levels of effort, we will investigate resolution requirements with grid operators and determine the optimal grid and or substation ICS representations for modeling/simulation. Reuse of CAISO or other models will be utilized where possible. Subsequent work will build and/or extend existing modeling/simulation tools to meet requirements outlined in the "Modeling/Simulation R&D Strategy." The modeling/simulation tools will then be used by other program tasks.

## **4. Establish Test Bed**

A test bed or multiple test beds are necessary to test prototype technologies. We will evaluate existing test beds at the IOUs, national laboratories, and colleges and universities. The most comprehensive and applicable test bed(s) will be selected for use by the CES-21 Cyber program for testing newly developed defensive technologies and investigating grid behavior in a controlled non-production environment. New test bed capabilities may be developed where gaps are identified.

**5. Advanced Threat Detection**

This task will focus on detection of “zero-day” or unknown cyber threats to ICS networks. This task is a low-level effort aimed at developing case studies to guide detection of heretofore unseen threats, building prototype algorithms to identify and detect them, and developing a research plan that outlines options for future investigation of this area. Interface to CRISP will need ICS ATD.

**6. Standardized Indicator Language**

Cyber indicators are already being distributed by government entities and private industry though a common data format has not been established. This task will evaluate the most used indicator languages and choose one for use within the CES-21 Cyber program. We will attempt to influence industry groups and government decision-makers where appropriate to use a common language for data exchange. We may identify and analyze current indicator languages available today, chose and adapt the chosen language further to encompass additional needs that the IOUs have for such a technology. The team will share any modifications to the chosen standard with the original author and community.

**7. Software/Device Vulnerability Analysis**

This task will focus on finding latent vulnerabilities in ICS device software using novel techniques. This task is a low-level effort that will investigate the existing tools in this field, build a prototype tool, and develop an R&D roadmap that outlines options for future investigation of this area.

**8. Tools for Course of Action Analysis**

We will investigate and develop technologies for taking defensive actions on ICS devices. The team will work closely with the IOUs to insure logic for automated and semi-automated responses meshes with their grid operation workflow.

**9. Generate Defensive Actions**

This task will focus on making changes to ICS networks in the face of cyber threats. The team will survey existing automated response systems for ICS networks (if any), work with grid operators to build a catalog of potential defensive actions, develop response actions, test those actions on our test bed network(s) and/or modeling/simulation framework, and integrate them into grid operations.

## **10. Secure System Interface Environment**

Research and identify a secure system interface environment for energy systems and sensors. As sensors grow across the intelligent smart grid an interface environment is needed that will allow for simple sensor interfaces and provide a high level of security and cyber protection for system sensors. Interfaces are typically expensive to develop and maintain. Sensor replacement, changes to existing sensor firmware and the addition of new sensors often requires interface upgrades or changes. This process can be costly and may delay sensor implementation while the interface is developed/upgraded, tested, implemented and introduce vulnerabilities. This task will research a common, secure interface environment that can function as a cybersecurity component that enhances overall security objectives.

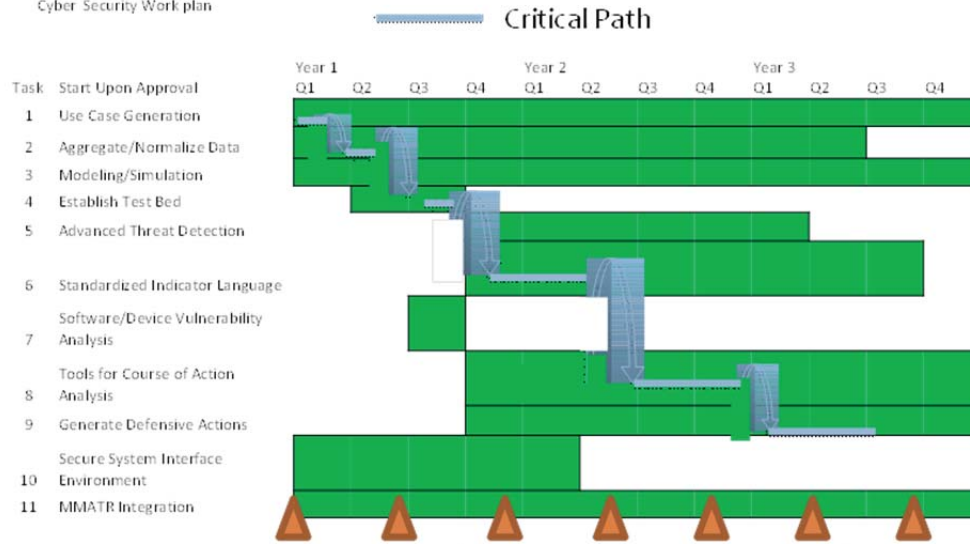
## **11. MMATR Integration**

The program will be executed using a spiral development methodology enabling resources to be quickly focused in areas that are yielding results. The main integration timeline is set up in 6 month R&D cycles with each cycle culminating in an internal review.

## **b) Schedule**

The following figure reflects the MMATR R&D Schedule and Critical Path. The tasks and schedule are subject to change based on lessons learned, new information and non-duplication of R&D efforts across the Utility Cybersecurity R&D space. Deliverables are the reports which will be completed at the end of each Agile Cycle Sprint estimated at six month intervals. Cybersecurity deliverables are subject to the restrictions as stated in the CES-21 Business Cases Program Management section.

Cyber Security Work plan



▲ Steering Committee examines output of every “sprint” and redirects research as needed. Failure of any effort may increase or decrease focus on or even ‘off -ramp’ of other tasks. Decisions documented in PM report for each “sprint”.

### c) Resource requirements

LLNL, IOU, and potential partner resources are required in the following areas:

- System architecture
- Software development
- Cyber security analysis
- Network analysis
- Software reverse engineering
- Cyber security incident response
- Modeling
- Grid infrastructure, controls, and communications networks

## 5. Work Breakdown Resource Allocation Budget

The total projected budget estimate for the three year period of task execution for MMATR is \$33,000,000. The budget is shown in the table below divided per year and by entity. Management administrative expenses will be limited to 10% of the total CES-21 budget and is spread over CES-21 management of MMATR and Grid Integration tasking. The Joint IOU Program Managers will move task dollars between years or into additional years as needed dependent on task completion. The PG&E and SDG&E Program Managers will seek CPUC approval if there is more than a 5% spending shift between the proposed MMATR or Grid Integration Business Cases as submitted in this Advice Letter.

Entity	PM1-12	PM13-24	PM25-36
LLNL and subcontractors	11,000,000	7,700,000	3,800,000
Utility	3,500,000	3,500,000	3,500,000
<b>Total</b>	<b>\$14,500,000</b>	<b>\$11,200,000</b>	<b>\$7,300,000</b>

## 6. Benefits Estimate and Methodology

The utilities have a large investment in infrastructure across California. The technologies for interconnectivity of control systems, though getting better, still show vulnerabilities, some known and some unknown. Any extended threat that succeeds could cause an



outage, locally, regionally or statewide. The research on outages on a regional scale shows millions of dollars in lost business revenues and productivity with a small to moderate outage. This investment in Cyber Security research and development will focus on creating a Cyber Security effort that curtails or interdicts those threats before they become an outage or has other lasting effects on the California grid.

# California Energy Systems for the 21<sup>st</sup> Century

## *Program Management for Research Project Business Cases*

### CES-21 Program Management

Public Utilities Code Section 740.5(c) and D.14-03-029, OP 9, provide that CES-21 project managers shall be limited to three representatives, one from each of the Joint Utilities. The Joint Utilities propose that the three CES-21 project managers serve as members of a joint utility steering committee responsible for the administration of the CES-21 Program. The three CES-21 project managers will coordinate with LLNL, administer the CES-21 Program and the CRADA, ensure that the CES-21 Program stays within the authorized budget, and submit a joint report summarizing the outcome of all funded projects 60 days following the conclusion of all research and development projects. In addition, the Joint Utilities will submit an annual report to the Commission on the administration and results of the CES-21 Program and will provide project progress reports as required by Energy Division staff.

Specific project management processes can be found below for each of the business case areas.

### Flexibility Metrics and Standards Project Management

In compliance with Resolution E-4677<sup>9</sup>, the project managers will:

1. Ensure that the project's Phase 1 builds off of the findings from PG&E's Collaborative Model Review effort and not spend unnecessary time or project funds on redoing work performed in that Collaborative Model Review. Reports containing updates on Phase 1 will clearly identify which aspects of PG&E's Collaborative Model Review have informed the project.
2. Form a Collaborative Advisory Group that includes Commission staff, the California Independent System Operator, ORA, The Utility Reform Network, and other experts<sup>10</sup>. The advisory group will meet once every six months. The primary purpose of the advisory group will be to assist in connecting the

---

<sup>9</sup> Provide reference when it becomes available

<sup>10</sup> "Other experts" should include those working on other flexibility models in Commission proceedings

Project Managers and project progress with ongoing developments in LTPP and RA flexibility modeling efforts, and vice versa.

3. Incorporate the following four actions into the project management process:
  - a. The project will use 2014 LTPP assumptions, including the Trajectory Scenario, to evaluate different possible operating flexibility metrics and standards.
  - b. The Project Managers will present the preliminary results and recommendations in a public workshop in early 2016 using initial input assumptions from the 2014 LTPP.
  - c. Using any applicable 2016 LTPP modeling assumptions that are available during the project time span, the Project Managers will demonstrate the use of any developed flexibility metrics and standards with at least one of the scenarios (and if only one, the Trajectory Scenario/expected case) adopted in the Commission's 2016 LTPP. This demonstration will be filed within that proceeding.
  - d. Project Managers will ensure that parties in the 2016 LTPP will have the opportunity to comment on results and recommendations.

The actions listed in section C above or their proxies shall take place regardless of project or Commission proceeding timelines. Reports will include progress updates toward these actions. Should unforeseen changes prevent them, the Project Managers will inform the Director of the Energy Division or the Director's designee via letter and work with the Commission to identify the best proxy actions; appropriate proxy actions would be ones that reasonably and intentionally help ensure results are useful and valuable to Commission proceedings.

4. Undertake a final stage of activities entitled Transfer Project Benefits and Results, which shall include: i) publishing a final report with findings and recommendations and making it publicly available to all parties through the LTPP, ii) making the full database of detailed modeling input assumptions available, to the extent allowed by the CRADA, iii) ensuring that other parties in the LTPP proceeding will be able to license and use any new or improved tools (if any) that are developed through the project, and iv) an informal training session for Commission staff on the tools and models developed by the project. The Project Managers will inform the Commission via a letter to the Director of the Energy Division or the Director's designee if they become aware of any barriers that

could hinder or prevent other parties from licensing or using any tools developed through the project.

5. Provide the full database of detailed modeling input assumptions, to the extent allowed by the CRADA, to the Collaborative Advisory Group once the database is available and subsequent to any major changes.

## Machine to Machine Automated Threat Response Project Management

In compliance with Resolution E-4677<sup>11</sup>, the project managers will:

The MMATR estimated timeline of tasks and work plan and additional project management elements will be used by the Project Managers of the MMATR Project. The Joint Utilities have added these changes to this project business case. The MMATR estimated timeline has also been added to the CRADA Attachment A to match the one above and has been updated in the CRADA compliance filing.

The Project Managers will inform the Director of the Energy Division or the Director's designee via letter if and when any critical path task is considered or selected for discontinuation. The critical path, as seen in the Schedule figure above, represents the main interdependent tasks whose failure or non-completion would endanger the entire project. The MMATR Project critical path consists of, and connects, tasks 1, 2, 4, 6, 8, and 9.

The Project Managers are responsible for managing MMATR progress, continuing to coordinate with other research groups and cybersecurity stakeholders, and will keep the Commission fully informed as the project develops to ensure duplication with other efforts does not arise.

The management process consists of continual cycles of review and evaluation using the Agile Development Cycle. This may lead to redirection of efforts.

The Project Managers will provide reports to the Commission as requested in the Decision and SB96. . Informal reporting will take place at the end of every six month period. Formal reports will be submitted annually as well as within 60 days after completion of R&D as required by D.12-12-031. All reports will identify the critical tasks including their percent completeness and estimates for completion date.

---

<sup>11</sup> Provide reference when it becomes available

Project Managers will meet with Energy Division and the Office of Ratepayer Advocates (ORA) staff every six months after the start of the project for programmatic review and status updates. Current technical direction and program management metrics will be reviewed. Technical direction updates will be provided verbally to staff cleared for cybersecurity information. Documentation will be reviewable by those same cleared staff in a transportable reading room. Due to the confidential nature of the work the majority of technical work will be designated sensitive and confidential not available for public distribution.

**Advice 2656-E**  
**(San Diego Gas & Electric ID U 902-E)**

**Advice 4516-E**  
**(Pacific Gas and Electric Company ID U 39 E)**

**Advice 3115-E**  
**(Southern California Edison Company ID U 338 E)**

## ATTACHMENT B

CES-21 CRADA

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

**STEVENS-ON-WYDLER (15 USC 3710)  
COOPERATIVE RESEARCH AND DEVELOPMENT AGREEMENT**

Between

**LAWRENCE LIVERMORE NATIONAL SECURITY, LLC**

and

**PACIFIC GAS & ELECTRIC COMPANY**

and

**SOUTHERN CALIFORNIA EDISON COMPANY**

and

**SAN DIEGO GAS & ELECTRIC COMPANY**

For

**THE 21ST CENTURY ENERGY SYSTEMS PROJECT**

**LLNL Case No. TC02200.0**

**Lawrence Livermore National Laboratory  
Lawrence Livermore National Security, LLC, Livermore, CA 94551  
Industrial Partnerships Office**

**October 9, 2014**

**This DRAFT CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

**TABLE OF CONTENTS**

Article I.	Definitions.....	2
Article II.	Statement of Work .....	4
Article III.	Term, Funding & Costs.....	4
Article IV.	Personal Property .....	5
Article V.	Disclaimer .....	5
Article VI.	Product Liability .....	6
Article VII.	Obligations as to Proprietary Information and Other Protected Information ...	6
Article VIII.	Obligations as to Protected CRADA Information .....	7
Article IX.	Rights in Generated Information .....	8
Article X.	Export Control .....	8
Article XI.	Reports and Abstracts .....	8
Article XII.	Pre-Publication and Pre-Release Review.....	10
Article XIII.	Copyrights.....	11
Article XIV.	Reporting Subject Inventions.....	13
Article XV.	Title to Subject Inventions.....	13
Article XVI.	Filing Patent Applications.....	14
Article XVII.	Trademarks .....	15
Article XVIII.	Mask Works.....	16
Article XIX.	Cost of Intellectual Property Protection.....	16
Article XX.	Reports of Intellectual Property Use.....	16
Article XXI.	DOE March-In Rights.....	16
Article XXII.	U.S. Competitiveness.....	16
Article XXIII.	Assignment of Personnel .....	17
Article XXIV.	Force Majeure .....	18
Article XXV.	Administration of the CRADA .....	18
Article XXVI.	Records and Accounting for Government Property.....	18
Article XXVII.	Notices .....	19
Article XXVIII.	Disputes.....	21
Article XXIX.	Entire CRADA and Modifications.....	21
Article XXX.	Termination.....	22
Article XXXI.	Third Party Rights in Intellectual Property.....	22
Appendix A	Statement of Work	
Appendix B	Energy Science and Technology Software Center Abstract Format	
Appendix C	Background Intellectual Property	



**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

STEVENSON-WYDLER (15 USC 3710)  
COOPERATIVE RESEARCH AND DEVELOPMENT AGREEMENT  
(hereinafter CRADA) NO. TC02200.0

between

LAWRENCE LIVERMORE NATIONAL SECURITY, LLC  
under its U.S. Department of Energy Contract No. DE-AC52-07NA27344

and

Pacific Gas & Electric Company

and

Southern California Edison Company

and

San Diego Gas & Electric Company

for

The 21<sup>st</sup> Century Energy Systems Project

This CRADA is between Lawrence Livermore National Security, LLC (hereinafter referred to as "LLNS"), a limited liability company incorporated in the State of Delaware and having its statewide administration address 2300 First Street, Suite 204, Livermore, California 94550-3153, Pacific Gas & Electric Company (hereinafter referred to as "PG&E"), a California corporation having its principal place of business at 77 Beale Street, San Francisco, California 94177, Southern California Edison Company (hereinafter referred to as "SCE"), a California corporation having its principal place of business at 2244 Walnut Grove Avenue, Rosemead, California 91770, and San Diego Gas & Electric Company (hereinafter referred to as "SDG&E"), a California corporation having its principal place of business at 8326 Century Park Court, San Diego, California 92123. PG&E, SCE and SDG&E are each hereinafter referred to as a "Participant" to this CRADA and jointly referred to as the "Participants" to this CRADA. LLNS, PG&E, SCE, and SDG&E are each hereinafter referred to as a "Party" or collectively as the "Parties" to this CRADA.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

LLNS is entering into this CRADA under the National Competitiveness Technology Transfer Act of 1989 (15 USC 3710) and the terms of its Contract No. DE-AC52-07NA27344 with the United States Department of Energy (DOE) for the operation of the Lawrence Livermore National Laboratory (LLNL). Work to be performed by LLNS employees is expected to be at the LLNL facility, owned by DOE, at 7000 East Avenue, Livermore, California 94550.

**Article I.                    Definitions**

- A.        "Government" means the Federal Government of the United States of America and agencies thereof.
- B.        "DOE" means the Department of Energy, an agency of the Federal Government.
- C.        "Contracting Officer" means the DOE employee administering LLNS's DOE contract.
- D.        "Generated Information" means information produced in the performance of this CRADA.
- E.        "Proprietary Information" means information which embodies (i) trade secrets or (ii) commercial or financial information which is privileged or confidential under the Freedom of Information Act (5 USC 552 (b)(4)), either of which is developed at private expense outside of this CRADA and which is marked as Proprietary Information.
- F.        "Other Protected Information" means information separate and apart from "Proprietary Information" and "Protected CRADA Information" which is (i) not developed at Government expense, (ii) clearly marked as being protected from public disclosure or other uses or (iii) is defined as privileged or confidential under the Freedom of Information Act (5 USC 552 (b)(4)).
- G.        "Protected CRADA Information" means Generated Information which is marked as being Protected CRADA Information by a Party to this CRADA and which would have been Proprietary Information had it been obtained from a non-federal entity.
- H.        "Subject Invention" means any invention of LLNS or Participant conceived or first actually reduced to practice in the performance of work under this CRADA.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- I. "Intellectual Property" means Patents, Copyrights, Trademarks, Mask Works, Protected CRADA Information, and other forms of comparable property rights protected by Federal Law and other foreign counterparts, except trade secrets.
- J. "Trademark" means a distinctive mark, symbol, or emblem used in commerce by a producer or manufacturer to identify and distinguish its goods or services from those of others.
- K. "Service Mark" means a distinctive word, slogan, design, picture, symbol or any combination thereof, used in commerce by a person to identify and distinguish its services from those of others.
- L. "Mask Work" means a series of related images, however fixed or encoded, having or representing the predetermined, three-dimensional pattern of metallic, insulating, or semiconductor material present or removed from the layers of a semiconductor chip product; and in which series the relation of the images to one another is that each image has the pattern of the surface of one form of the semiconductor chip product (17 USC 901(a)(2)).
- M. "Background Intellectual Property" means the Intellectual Property identified by the Parties in Appendix C, Background Intellectual Property, which was in existence prior to or is first produced outside of this CRADA, except that in the case of inventions in those identified items, the inventions must have been conceived outside of this CRADA and not first actually reduced to practice under this CRADA to qualify as Background Intellectual Property.
- N. "Derivative Work" is a work based upon one or more preexisting works. The copyright in a derivative work extends only to the material contributed by the author of such work, as distinguished from the preexisting material employed in the work, and does not imply any exclusive right in the preexisting material. The copyright in the derivative work exists independent of, and does not enlarge or otherwise affect the scope, duration, ownership, or subsistence of, any copyright protection in the preexisting material. A licensee granted ownership rights in a derivative work owns a copyright only in the new matter contributed, not in the preexisting materials upon which the derivative work is based.

**Article II. Statement of Work**

Appendix A, Statement of Work, is an integral part of this CRADA. The work to be performed under this CRADA is on a "best efforts basis" by the Parties.

**Article III. Term, Funding & Costs**

- A. The effective date of this CRADA shall be the latter date of (1) the date on which it is signed by the last of the Parties, or (2) the date on which it is approved by DOE. The work to be performed under this CRADA shall be completed within five (5) years from the effective date.
- B. The total estimated project cost is Thirty Five Million Dollars (\$35,000,000). PG&E's estimated in-kind contribution is Five Million, One Hundred and Thirty-Nine Thousand Dollars (\$5,139,000) and estimated funds-in is Twelve Million, Three Hundred and Sixty-One Thousand Dollars (\$12,361,000). SCE's estimated in-kind contribution is Four Million, Five Hundred and Sixty-Six Thousand Dollars (\$4,566,000) and estimated funds-in is Nine Million and Seven Hundred and Eighty-Four thousand Dollars (\$9,784,000). SDG&E's estimated in-kind contribution is Nine Hundred and Forty-Five Thousand Dollars (\$945,000) and estimated funds-in is Two Million, Two Hundred and Five Thousand Dollars (\$2,205,000).
- C. No Party shall have an obligation to continue or complete performance of its work at a contribution in excess of its estimated contribution as contained in Article III, Paragraph B, including any subsequent amendment.
- D. Each Party agrees to use reasonable efforts to provide at least thirty (30) days' notice to the other Parties if the actual cost to complete performance will exceed its estimated cost.
- E. Advance funding sufficient to finance ninety (90) days of work shall be paid by the Participants before the work shall commence. Sufficient advance funds shall be provided to maintain a continuous ninety (90) days of advance funding during the life of the project. Failure to provide such advance funding is cause for CRADA termination. This

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

CRADA contemplates Participants funding prior to the performance and completion by LLNS of its obligations hereunder. Such funding shall not constitute any form of acceptance or waiver by the Participants of any available legal or equitable rights or remedies, whether involving refunds, damages or otherwise.

**Article IV.            Personal Property**

All tangible personal property produced or acquired under this CRADA shall become the property of the Participant whose funds were used to obtain it. No Government funds shall be used to produce or acquire tangible personal property under this CRADA. Such property is identified in Appendix A, Statement of Work. Personal Property shall be disposed of as directed by the owner at the owner's expense. All jointly funded property shall be owned by those Participants that have contributed funding to acquire the specific property, with ownership to be proportional to the Participant's contribution to the funding that was used to acquire the specific property.

**Article V.            Disclaimer**

The government, the participants, and LLNS make no express or implied warranty as to the conditions of the research or any intellectual property, generated information, or product made or developed under this CRADA, or the ownership, merchantability, or fitness for a particular purpose of the research or resulting product. Neither the government, the participants, nor LLNS shall be liable for special, consequential or incidental damages attributed to such research or resulting product, intellectual property, generated information, or product made or developed under this CRADA. Further, neither the government, the participants, nor LLNS shall be liable for indirect or punitive damages to the extent allowed by law. Without limiting the generality of the foregoing, neither of the participants nor LLNS shall have any (a) duty hereunder to investigate whether any of their respective background intellectual property, trade secrets or intellectual property infringes upon any third party patent, trademark, copyright, trade secret or other intellectual property right except where notice has been given that a use may be infringing by a third party or (b) obligation of indemnification, defense or other liability hereunder in the case of any actual or alleged infringement thereof, except where use is made after a notification of potential infringement and without a good faith determination that the use does not infringe on such third party's rights.

**Article VI. Product Liability**

The Participants will indemnify the Government and LLNS for all damages, costs and expenses, including attorney's fees, arising from personal injury or property damage occurring as a result of the making, using or selling of a product, process or service by or on behalf of a Participant, its assignees, or licensees except for LLNS pursuant to Article XV, which was derived from the work performed under this CRADA. In respect to this Article, neither the Government nor LLNS shall be considered assignees or licensees of any Participant, as a result of reserved Government and LLNS's rights, except for LLNS pursuant to Article XV. The indemnity set forth in this paragraph shall apply only if Participant shall have been informed as soon and as completely as practical by LLNS and/or the Government of the action alleging such claim and shall have been given an opportunity, to the maximum extent afforded by applicable laws, rules, or regulations, to participate in and control its defense, and LLNS and/or Government shall have provided all reasonably available information and reasonable assistance requested by Participant. No settlement for which a Participant would be responsible shall be made without such Participant's consent unless required by final decree of a court of competent jurisdiction.

**Article VII. Obligations as to Proprietary Information and Other Protected Information**

- A. Each Party agrees to not disclose Proprietary Information and Other Protected Information provided by another Party to anyone other than the CRADA Participants and LLNS without written approval of the providing Party, except (1) to Government employees who are subject to the statutory provisions against disclosure of confidential information set forth in the Trade Secrets Act (18 USC 1905) or (2) when required in order to comply with any regulatory or legal requirement applicable to a Party to this Agreement; provided however, any such disclosure shall be subject to prior written notice to the owner of the Proprietary Information or Other Protected Information.
- B. If Proprietary Information or Other Protected Information is orally disclosed to a Party, it shall be identified as such, orally, at the time of disclosure and confirmed in a written summary thereof, appropriately marked by the disclosing party, within thirty (30) days as being Proprietary Information or Other Protected Information.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- C. All Proprietary Information and Other Protected Information shall be protected from the effective date of this CRADA, unless such Proprietary Information or such Other Protected Information: (1) becomes publicly known without the fault of the recipient, (2) shall come into recipient's possession without breach by the recipient of any of the obligations set forth herein, or (3) is independently developed by recipient's employees who did not have access to such Proprietary Information or Other Protected Information.
- D. Proprietary Information and Other Protected Information in tangible form shall be returned to the disclosing Party or destroyed with a certificate of destruction submitted to the disclosing Party upon termination or expiration of this CRADA, or during the term of this CRADA upon request by the disclosing Party.

**Article VIII. Obligations as to Protected CRADA Information**

- A. Each Party may designate as Protected CRADA Information, any Generated Information produced by its employees which is generated with any Participant funds pursuant to this CRADA and meets the definition of Article I.G and, at the request of any Party, will so designate any Generated Information which meets the definition of Article I.G. All such designated Protected CRADA Information shall be appropriately marked.
- B. For a period of five (5) years from the date Protected CRADA Information is produced, the Parties agree not to further disclose such Protected CRADA Information except:
- (1) as necessary to perform this CRADA;
  - (2) as provided in Article XI (Reports and Abstracts);
  - (3) as requested in writing by the DOE Contracting Officer to be provided to other DOE facilities for use only at those DOE facilities with the same protection in place;
  - (4) as reasonably required in order to comply with any regulatory or legal requirement applicable to a Party to this CRADA; or
  - (5) as mutually agreed in writing by the Parties in advance.

- C. The obligations of Paragraph B shall end sooner for any Protected CRADA Information which shall: (1) become publicly known without fault of any Party, (2) shall come into a Party's possession without breach by that Party of the obligations of Paragraph B, or (3) shall be independently developed by a Party's employees who did not have access to the Protected CRADA Information.

**Article IX. Rights in Generated Information**

The Parties agree that they shall have no obligations of nondisclosure or limitations on their use of, and the Government shall have unlimited rights in, all Generated Information produced and information provided by the Parties under this CRADA, except for (a) information which is marked as being Copyrighted (subject to Article XIII) or as Protected CRADA Information (subject to Article VIII, Paragraph B) or as Proprietary Information or Other Protected Information (subject to Article VII), or (b) information that discloses a Subject Invention.

**Article X. Export Control**

The parties understand that materials and information resulting from the performance of this CRADA may be subject to export control laws and that each party is responsible for its own compliance with such laws.

**Article XI. Reports and Abstracts**

- A. The Parties agree to produce the following deliverables, subject to any applicable restrictions on disclosure as provided in this CRADA:
- (1) an initial abstract suitable for public release at the time this CRADA is approved by DOE;
  - (2) other abstracts (final when work is complete, and others as substantial changes in scope and dollars occur);



**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- (3) a final report, upon completion or termination of this CRADA, to include a list of Subject Inventions;
- (4) [Reserved]
- (5) other topical/periodic reports where the nature of research and magnitude of dollars justify; and
- (6) computer software in source and executable object code format as defined within the Statement of Work or elsewhere within this CRADA documentation.

Each of the above-identified deliverables shall include the project identification number as described in DOE's Research and Development (R&D) Tracking System Data and Process Guidance Document (<http://www.osti.gov/rdprojects/guidance.jsp>). The Parties acknowledge that no financial report of the Participants' in-kind contributions to the project are required. LLNS represents that no financial reports of the Participants' in-kind contributions are required under LLNL's Contract No. DE-AC52-07NA27344 with the United States Department of Energy (DOE) or this CRADA.

- B. The Parties acknowledge that LLNS has the responsibility to provide the above information at the time of its completion to the DOE Office of Scientific and Technical Information, with the appropriate marking in place as may apply to the information generated under this CRADA. LLNL will provide all Participants with a copy of the above information to the extent permitted by contract or law.
- C. The Participants agree to provide the above information, appropriately marked, to LLNS to enable full compliance with Paragraph B of this Article, with the understanding that the LLNS will assure that the appropriate marking required for information under this CRADA remains in place before the information is disclosed to DOE or others as further described in Paragraph B of this Article.
- D. The Parties acknowledge that LLNS and DOE have a need to document the long-term economic benefit of the cooperative research being done under this CRADA. Therefore, the Participants shall respond to LLNS's reasonable requests, during the term of this CRADA and for a period of three (3) years thereafter for pertinent information. LLNS shall respond to Participants' reasonable requests, during the term of this CRADA and for a period of three (3) years thereafter for pertinent information.

**Article XII. Pre-Publication and Pre-Release Review**

- A. The Parties anticipate that their employees may wish to publish technical developments and/or research findings generated in the course of this CRADA and that reports will be provided to the DOE as described in Article XI above. On the other hand, the Parties recognize that an objective of this CRADA is to provide business advantages to the Participants. In order to reconcile publication/DOE reporting requirements and business concerns, the Parties agree to a review procedure as follows:
- (1) Each Party ("Submitter") shall submit to the other Parties ("Recipients"), in advance, proposed written and oral publications pertaining to work under this CRADA and all reports intended to be submitted to the DOE as described in Article XI above. Proposed oral publications shall be submitted to Recipients in the form of a written presentation synopsis and a written abstract.
  - (2) The Recipients shall provide a written response to the Submitter within thirty (30) days, either objecting or not objecting to the proposed publication or report to be provided to the DOE. The Submitter shall consider all objections of the Recipients and shall not unreasonably refuse to incorporate the suggestions and meet the objections of the Recipients. The proposed publication or report to be provided to the DOE shall be deemed not objectionable for purposes of this provision, unless the proposed publication contains Proprietary Information, Other Protected Information, Protected CRADA Information, a Subject Invention, Intellectual Property, export control information, or material that would create potential statutory bars to filing the United States or corresponding foreign patent applications, in which case express written permission shall be required for publication.
- B. The Parties agree that no Party will use the name of another Party or its employees in any promotional activity, such as advertisements, with reference to any product or service resulting from this CRADA, without prior written approval of the other Party.

**Article XIII.            Copyrights**

- A.        The Parties may assert Copyright in any of their Generated Information. Assertion of Copyright generally means to enforce or give any indication of an intent or right to enforce such as by marking or securing Federal registration.
  
- B.        Pursuant to Articles VII, VIII, IX, and XIII of the CRADA and California Public Utilities Commission (CPUC) Decision 12-12-031, the Participants shall jointly retain title to Copyrights produced or derived during the performance of work under this CRADA, and have the discretion and authority to license, sell or encumber any such intellectual property to LLNS and third parties upon CPUC approval under Public Utilities Code Section 851 and subject to the requirement that any such licensing be on fair, reasonable and non-discriminatory grounds, for a fair and reasonable licensing fee, and also subject to rights granted by law to the U.S. Federal Government under the CRADA. Copyrights that were in existence prior to or produced outside the CRADA and that is identified in advance by the parties in Appendix C, will remain the property of the party owning the intellectual property or proprietary information, unless the Parties mutually agree otherwise. The Participants hereby grant to LLNS a nonexclusive, nontransferable, irrevocable, paid-up Copyright license to reproduce, prepare derivative works, and perform publicly and display publicly all Copyrightable works produced in the performance of this CRADA, subject to the restrictions this CRADA places on disclosure of Proprietary Information and Protected CRADA Information.
  
- C.        For Generated Information, the Parties acknowledge that the Government has for itself and others acting on its behalf, a royalty-free, nontransferable, nonexclusive, irrevocable, worldwide Copyright license to reproduce, prepare derivative works, distribute copies to the public, and perform publicly and display publicly, by or on behalf of the Government, all Copyrightable works produced in the performance of this CRADA for research and development purposes, subject to the restrictions this CRADA places on publication of Proprietary Information and Protected CRADA Information.
  
- D.        For all Copyrighted computer software produced in the performance of this CRADA, the Party owning the Copyright will provide the source code, an expanded abstract as described in Appendix B, Energy Science and Technology Software Center, the

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

executable object code and the minimum support documentation needed by a competent user to understand and use the software, to DOE's Energy Science and Technology Software Center, P. O. Box 62, Oak Ridge, TN 37831-1020. The expanded abstract will be treated in the same manner as Generated Information in Paragraph C of this Article.

- E. LLNS and the Participants agree that, with respect to any Copyrighted computer software produced in the performance of this CRADA, DOE has the right, at the end of the period set forth in Article VIII, Paragraph B hereof and at the end of each two-year interval thereafter, to request LLNS and the Participants and any assignee or exclusive licensee of the Copyrighted software to grant a nonexclusive, partially exclusive, or exclusive license to a responsible applicant upon terms that are reasonable under the circumstances, provided such grant does not cause a termination of any licensee's right to use the Copyrighted computer software. If LLNS or the Participants or any assignee or exclusive licensee refuses such request, LLNS and the Participants agree that DOE has the right to grant the license if DOE determines that LLNS and the Participants, assignee, or licensee has not made a satisfactory demonstration that it or its assignee, licensee or agent is actively pursuing commercialization of the Copyrighted computer software.
- F. Before requiring licensing under this Paragraph E, DOE shall furnish to LLNS/Participants written notice of its intentions to require LLNS/Participants to grant the stated license, and LLNS/Participants shall be allowed thirty (30) days (or such longer period as may be authorized by the cognizant DOE Contracting Officer for good cause shown in writing by LLNS/Participants) after such notice to show cause why the license should not be required to be granted.
- G. LLNS/Participants shall have the right to appeal the decision by DOE to the grant of the stated license to the Invention Licensing Appeal Board as set forth in Paragraphs (b) - (g) of 10 CFR 781.65, "Appeals".
- H. The Parties agree to place Copyright and other notices, as appropriate for the protection of Copyright, in human-readable form onto all physical media, and in digitally encoded form in the header of machine-readable information recorded on such media such that the notice will appear in human-readable form when the digital data are offloaded or the data are accessed for display or printout.

**Article XIV.           Reporting Subject Inventions**

- A.       The Parties agree to disclose to each other each Subject Invention which may be patentable or otherwise protectable under the Patent Act. The Parties agree that LLNS and Participants will disclose their respective Subject Inventions to DOE and each other within two (2) months after the inventor first discloses the Subject Invention in writing to the person(s) responsible for Patent matters of the disclosing Party.
- B.       These disclosures should be in sufficiently complete technical detail to convey a clear understanding, to the extent known at the time of the disclosure, of the nature, purpose and operation of the Subject Invention. The disclosure shall also identify any known actual or potential statutory bars (i.e., printed publications describing the Subject Invention or the public use or "on sale" of the Subject Invention in this country). The Parties further agree to disclose to each other any subsequently known actual or potential statutory bar that occurs for a Subject Invention disclosed but for which a Patent application has not been filed. All Subject Invention disclosures shall be marked as confidential under 35 USC 205.

**Article XV.           Title to Subject Inventions**

Wherein DOE has granted the Participants and LLNS the right to elect to retain title to their respective Subject Inventions, and wherein the Participants have the option to choose an exclusive license, for reasonable compensation, for a pre-negotiated field of use to LLNS's Subject Inventions,

- A.       Pursuant to Articles VII, VIII, IX, and XV of the CRADA and CPUC Decision 12-12-031, the Participants shall jointly retain title to Subject Inventions produced during the performance of work under this CRADA, and have the discretion and authority to license, sell or encumber any such intellectual property to LLNS and third parties upon CPUC approval under Public Utilities Code Section 851 and subject to the requirement that any such licensing be on fair, reasonable and non-discriminatory grounds, for a fair and reasonable licensing fee, and also subject to rights granted by law to the U.S. Federal Government under the CRADA. Subject Inventions that were in existence prior to or produced outside the CRADA and that are identified in advance by the parties in

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

Appendix C, will remain the property of the party owning the intellectual property or proprietary information, unless the Parties mutually agree otherwise.

- B. The Participants hereby grant to LLNS a nonexclusive, nontransferable, irrevocable, paid-up license to practice or to have practiced every Subject Invention under this CRADA, subject to mutual agreement to a fair and reasonable licensing cost in compliance with Ordering Paragraph 18 of Decision No. 12-12-031 of the CPUC.
- C. The Participants acknowledge that LLNS has offered to the Participants the option to choose an exclusive license for a pre-negotiated field of use for reasonable compensation for any Subject Invention made in whole or in part by a LLNS employee.
- D. The Parties acknowledge that DOE may obtain title to each Subject Invention reported under Article XIV for which a Patent application or applications are not filed pursuant to Article XVI and for which any issued Patents are not maintained by any Party to this CRADA.
- E. The Parties acknowledge that the Government retains a nonexclusive, nontransferable, irrevocable, paid-up license to practice or to have practiced for or on behalf of the United States every Subject Invention under this CRADA throughout the world for research and development purposes. The Parties agree to execute a Confirmatory License to affirm the Government's retained license.

**Article XVI. Filing Patent Applications**

- A. The Parties agree that, the Participants shall have the first opportunity to jointly file U.S. and foreign Patent applications. The Participants shall agree between themselves as to who will file Patent applications on any Subject Invention. If Participants do not file such applications within one (1) year after election, then LLNS may file Patent applications on such Subject Inventions and retain title to such Subject Inventions. If a Patent application is filed by a Party ("Filing Party"), the inventing Party shall reasonably cooperate and assist the Filing Party, at the Filing Party's expense, in executing a written assignment of the Subject Invention to the Filing Party and in otherwise perfecting the Patent application, and the Filing Party shall have the right to control the prosecution of the Patent application.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- B. The Parties agree that DOE has the right to file Patent applications in any country if no Party desires to file a Patent application for any Subject Invention. Notification of such negative intent shall be made in writing to the DOE Contracting Officer within three (3) months of the decision of the non-Inventing Parties to not file a Patent application for the Subject Invention pursuant to Article XV or not later than sixty (60) days prior to the time when any statutory bar might foreclose filing of a U.S. Patent application.
- C. The Parties agree to include within the beginning of the specifications of any U.S. Patent applications and any Patent issuing thereon (including foreign Patents) covering a Subject Invention, the following statement: "This invention was made under a CRADA TC02200.0 among Pacific Gas & Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, and Lawrence Livermore National Laboratory operated for the United States Department of Energy. The Government has certain rights in this invention."
- D. A Party electing title or filing a Patent application in the United States or in any foreign country shall advise the other Parties and DOE if it no longer desires to continue prosecution, pay maintenance fees, or retain title in the United States or any foreign country. The other Parties and then DOE will be afforded the opportunity to take title and retain the Patent rights in the United States or in any such foreign country.
- E. Each Party agrees to provide the project manager of the other Parties upon request with a copy of each Patent application it files on any Subject Invention.

**Article XVII. Trademarks**

The Parties may seek to obtain Trademark/Service Mark protection on products or services generated under this CRADA in the United States or foreign countries. The Party originating the Trademark/Service Mark on products or services generated under this CRADA in the United States or foreign countries, shall have the full right, title, and interest in such Trademark or Service Mark subject only to the Government's retained right to use the mark on any similar goods or services as set forth below. The Parties hereby acknowledge that the Government shall have the right to indicate on any similar goods or services produced by or for the Government that such goods or services were derived from and are a DOE version of the goods or services protected by such Trademark/Service Mark, with the Trademark and the owner thereof being

specifically identified. In addition, the Government shall have the right to use such Trademark/Service Mark in print or communications media.

**Article XVIII.      Mask Works      [RESERVED]**

**Article XIX.      Cost of Intellectual Property Protection**

Each Party shall be responsible for payment of all costs relating to Copyright, Trademark, and Mask Work filing; U.S. and foreign Patent application filing and prosecution; and all costs relating to maintenance fees for U.S. and foreign Patents hereunder which are solely owned by that Party. Government/DOE laboratory funds contributed as DOE's cost share to a CRADA cannot be given to a Participant for payment of the Participant's costs of filing and maintaining Patents or filings for Copyrights, Trademarks, or Mask Works.

**Article XX.      Reports of Intellectual Property Use**

The Participants agree to submit, for a period of three (3) years from the date of termination or completion of this CRADA and upon request of DOE, a nonproprietary report no more frequently than annually on the efforts to utilize any Intellectual Property arising under this CRADA.

**Article XXI.      DOE March-In Rights**

The Parties acknowledge that DOE has certain march-in rights to any Subject Inventions in accordance with 48 CFR 27.304-1 (g) and 15 USC 3710a(b)(1)(B) and (C).

**Article XXII.      U.S. Competitiveness**

The Parties agree that a purpose of this CRADA is to provide substantial benefit to the U.S. economy.



**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- A. In exchange for the benefits received under this CRADA, the Participants therefore agree to the following:
1. Products embodying Intellectual Property developed under this CRADA shall be substantially manufactured in the United States; and
  2. Processes, services, and improvements thereof which are covered by Intellectual Property developed under this CRADA shall be incorporated into a Participant's manufacturing facilities in the United States either prior to or simultaneously with implementation outside the United States. Such processes, services, and improvements, when implemented outside the United States, shall not result in reduction of the use of the same processes, services, or improvements in the United States.
- B. LLNS agrees to include a U.S. Industrial Competitiveness clause in accordance with its prime contract with respect to any licensing and assignments of its intellectual property arising from this CRADA, except that any licensing or assignment of its intellectual property rights to any Participant shall be in accordance with the terms of Paragraph A of this Article.

**Article XXIII. Assignment of Personnel**

- A. Each Party may assign personnel to another Party's facility as part of this CRADA to participate in or observe the research to be performed under this CRADA. Such personnel assigned by the assigning Party shall not during the period of such assignments be considered employees of the receiving Party for any purposes, including but not limited to any requirements to provide workers' compensation, liability insurance coverage, payment of salary or other benefits, or withholding of taxes.
- B. The receiving Party shall have the right to exercise routine administrative and technical supervisory control of the occupational activities of such personnel during the assignment period and shall have the right to approve the assignment of such personnel and/or to later request their removal by the assigning Party.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- C. The assigning Party shall bear any and all costs and expenses with regard to its personnel assigned to the receiving Party's facilities under this CRADA. The receiving Party shall bear facility costs of such assignments.

**Article XXIV. Force Majeure**

No failure or omission by LLNS or Participants in the performance of any obligation under this CRADA shall be deemed a breach of this CRADA or create any liability if the same shall arise from any cause or causes beyond the control of LLNS or any Participant, including but not limited to the following, which, for the purpose of this CRADA, shall be regarded as beyond the control of the Party in question: Acts of God; acts or omissions of any government or agency thereof; compliance with requirements, rules, regulations, or orders of any governmental authority or any office, department, agency, or instrumentality thereof; fire; storm; flood; earthquake; accident; acts of the public enemy; war; rebellion; insurrection; riot; sabotage; invasion; quarantine; restriction; transportation embargoes; or failures or delays in transportation.

**Article XXV. Administration of the CRADA**

LLNS enters into this CRADA under the authority of its prime contract with DOE. LLNS is authorized to and will administer this CRADA in all respects unless otherwise specifically provided for herein. Administration of this CRADA may be transferred from LLNS to DOE or its designee with notice of such transfer to the Participants, and LLNS shall have no further responsibilities except for the confidentiality, use, and/or nondisclosure obligations of this CRADA.

**Article XXVI. Records and Accounting for Government Property**

Each Participant shall maintain records of receipts, expenditures, and the disposition of all Government property in its custody related to this CRADA.

**Article XXVII.     Notices**

A.     Any communications required by this CRADA, if given by postage prepaid first class U.S. Mail or other verifiable means addressed to the Party to receive the communication, shall be deemed made as of the day of receipt of such communication by the addressee, or on the date given if by verified facsimile. Address changes shall be given in accordance with this Article and shall be effective thereafter. All such communications, to be considered effective, shall include the number of this CRADA.

B.     The addresses, emails, telephone numbers and facsimile numbers for the Parties are as follows:

1. For LLNS:

U.S. Mail Only:

Lawrence Livermore National Security, LLC  
Lawrence Livermore National Laboratory  
Industrial Partnerships Office  
P.O. Box 808, L-795  
Livermore, CA 94551

FedEx, UPS, Freight:

Lawrence Livermore National Security, LLC  
Lawrence Livermore National Laboratory  
Industrial Partnerships Office  
7000 East Avenue, L-795  
Livermore, CA 94550

a. FORMAL NOTICES AND COMMUNICATIONS, COPIES OF REPORTS

Attn:    Charity Follett, CRADA Business Development Executive  
Tel:     (925) 422-6416  
Fax:     (925) 423-8988  
Email:   follett2@llnl.gov

b. PROJECT MANAGER, REPORTS, COPIES OF FORMAL NOTICES AND COMMUNICATIONS

Attn:    Jamie Van Randwyck, Associate Program Leader  
Tel:     (925) 423-5307  
Fax:     (925) 423-8123  
Email:   vanrandwyk1@llnl.gov

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

1. For PG&E:

U.S. Mail Only:  
Pacific Gas & Electric Company  
77 Beale Street  
San Francisco, CA 94177

FedEx, UPS, Freight:  
Same as U.S. Mail

a. FORMAL NOTICES AND COMMUNICATIONS, COPIES OF REPORTS

Attn: David Bayless  
Tel: (415) 793-4391  
Email: dpb5@pge.com

b. PROJECT MANAGER, REPORTS, COPIES OF FORMAL NOTICES AND COMMUNICATIONS

Attn: Suna Taymaz  
Tel: (415) 972-5334  
Email: sgt5@pge.com

2. For SCE:

U.S. Mail Only:  
Southern California Edison  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

FedEx, UPS, Freight:  
Same as U.S. Mail

a. FORMAL NOTICES AND COMMUNICATIONS, COPIES OF REPORTS

Attn: Florence Pinigis  
Tel: (626) 302-3959  
Email: Florence.Pinigis@sce.com

b. PROJECT MANAGER, REPORTS, COPIES OF FORMAL NOTICES AND COMMUNICATIONS

Attn: Joy Weed  
Tel: (626) 543-6415  
Email: joy.weed@sce.com

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

3. For SDG&E:

U.S. Mail Only:

San Diego Gas & Electric Company  
8326 Century Park Court  
San Diego, CA 92123

FedEx, UPS, Freight:

Same as U.S. Mail

a. FORMAL NOTICES AND COMMUNICATIONS, COPIES OF REPORTS

Attn: Gary Perlmutter  
Tel: (619) 699-5075  
Email: GPerlmutter@sempra.com

b. PROJECT MANAGER, REPORTS, COPIES OF FORMAL NOTICES AND COMMUNICATIONS

Attn: Corey McClelland  
Tel: (619) 260-4304  
Email: CMcClelland2@semprautilities.com

**Article XXVIII. Disputes**

At the request of a Party, after reasonable attempt to settle without arbitration, any controversy or claim arising out of or relating to the CRADA shall be settled by arbitration conducted in the State of California in accordance with the then current and applicable rules of the American Arbitration Association. Judgment upon the award rendered by the Arbitrator(s) shall be nonbinding on the Parties.

**Article XXIX. Entire CRADA and Modifications**

- A. This CRADA with its Appendices contains the entire agreement between the Parties with respect to the subject matter hereof, and that all prior representations or agreements relating hereto have been merged into this document and are thus superseded in totality by this CRADA. This CRADA shall not be effective until approved by DOE.
- B. Any agreement to materially change any terms or conditions of this CRADA or the appendices shall be valid only if the change is made in writing, executed by the Parties hereto, and approved by DOE.

**Article XXX.        Termination**

This CRADA may be terminated by a Party upon thirty (30) days written notice to the other Parties. This CRADA may also be terminated by LLNS in the event of failure by any Participant to provide the necessary advance funding, as agreed in Article III, or by the Participants in the event of a failure by any Party to fulfill its obligations under this CRADA, including to use funds provided by the Participants under Article III in conformity with the requirements of this CRADA and for the project contemplated hereunder.

In the event of termination by a Party, each Party shall be responsible for its share of the costs incurred through the effective date of termination, as well as its share of the costs incurred after the effective date of the termination, and which are related to the termination. Following termination of the CRADA and payment of costs for which Participants are responsible, LLNL will refund any amount remaining from advance funds provided by the Participants pursuant to Article III of this CRADA.

The confidentiality, use, and/or non-disclosure obligations of this CRADA shall survive any termination of this CRADA

**Article XXXI.        Third Party Rights in Intellectual Property**

The Parties acknowledge that the Statement of Work in Appendix A of this CRADA describes work that may be performed by third parties and/or subcontractor(s) to one or more of the Parties and that separate agreement(s) with such third parties may be needed with respect to intellectual property owned by such third parties.

**This space intentionally left blank**

**FOR LLNS: LAWRENCE LIVERMORE NATIONAL SECURITY, LLC  
LAWRENCE LIVERMORE NATIONAL LABORATORY**

BY: \_\_\_\_\_

NAME: Elizabeth (Betsy) R. Cantwell

TITLE: Acting Director, Economics

DATE: \_\_\_\_\_

DRAFT

**FOR PG&E: PACIFIC GAS & ELECTRIC COMPANY**

BY: \_\_\_\_\_

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_

DRAFT



**FOR SCE: SOUTHERN CALIFORNIA EDISON COMPANY**

BY: \_\_\_\_\_

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_

DRAFT

**FOR SDG&E:        SAN DIEGO GAS AND ELECTRIC COMPANY**

BY: \_\_\_\_\_

NAME: \_\_\_\_\_

TITLE: \_\_\_\_\_

DATE: \_\_\_\_\_

DRAFT

**APPENDIX A**

**STATEMENT OF WORK**

**Related to LLNL Case No. TC02200.0**

**21ST CENTURY ENERGY SYSTEMS PROJECT**

**A. Purpose**

This is a collaborative effort between Lawrence Livermore National Security, LLC as manager and operator of Lawrence Livermore National Laboratory (LLNL), Pacific Gas & Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E). PG&E, SCE and SDG&E are collectively referred to as the California Investor Owned Utilities (IOUs). The purpose of this Cooperative Research and Development Agreement (CRADA) is to apply computationally based problem solving resources to the emerging challenges of the 21st century energy system. This CRADA project intends to produce deliverables to address California's energy challenges in cyber security and grid integration.

**1) Background**

New laws and regulations and technological innovations often drive changes in California's energy system. Many changes, such as the introduction of renewable generation, electrified vehicles and smart meters, are directly visible to consumers. There are a myriad of other advanced innovations woven into the energy network that are virtually invisible from the consumer experience, like intermittency management of renewables, energy storage for electrified vehicles, data management of smart-meter information, and cyber security of these new smart devices.

**Cyber Security**

The cyber security industry is making great strides in the areas of protection and detection capabilities. For example, government programs such as Einstein 1, 2, and 3, ADAMS, and CINDER promise to protect government information systems by improving situational awareness and improving detection and protection capabilities. However, for the most part, when it comes to reacting to attacks, these systems rely on alerting those under attack to take remedial action. Manual responses may be adequate

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

for cyber-attacks against information systems and their data, but manual responses to cyber-attacks against critical infrastructure may not be fast enough to keep attackers from damaging the critical infrastructure. What's needed is an automated response capability to protect the critical infrastructure against cyber-attacks.

The automated response capability would essentially mimic a military strategy developed by U.S. Air Force Colonel John Boyd and applied to the combat operations process known as the OODA loop. According to Boyd, decision-making occurs in a recurring observe-orient-decide-act (OODA) loop. In combat, the opponent who can process this cycle quicker has the advantage. In cyber security as in war, the ability to observe and react to threats more rapidly than the attacker will significantly enhance the system's ability to survive an attack. The advancement in cyber technology will enable the IOUs to identify and take action on advanced cyber threats before they impact California's critical infrastructure.

This activity leverages the relationship between the three California Investor Owned Utilities (IOUs), in collaboration with Lawrence Livermore National Laboratory (LLNL) to develop the automated response capabilities needed to protect the state's critical infrastructure against cyber-attacks.

### **Grid Integration**

Current reliability metrics and targets were developed for an electric grid that did not have as much non-dispatchable and intermittent resources as the future grid envisioned by California's Clean Energy Plan. The metrics that have historically been used to monitor and ensure a stable grid operation were designed in a different era that do not capture the range and diversity of available control mechanisms that would be present on the grid of the future, nor do they capture the inherent uncertainty and variability of new intermittent generation sources and load changes. Thus metrics that capture this and provide a broader scope of control options are needed.

Today, California Independent System Operator (CAISO) and the IOUs use off-the-shelf production simulation models to test the adequacy of the system to meet traditional operating reliability and new flexibility requirements under a given scenario. If resources are not adequate, the model estimates resource deficiencies, and after a trial and error process estimates the amount of conventional resources needed to clear resource

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

deficiencies. Because simulations are time consuming, a day or more is needed to evaluate a single weather scenario for a single year. As a result, system analyses are often limited to single weather conditions and few load and resource scenarios, rather than performing a stochastic simulation to properly account for reliability risks. In addition, modeling simplifications are made (such as use of hourly granularity instead of one-minute or five-minute granularity), which may result in an inadequate representation of actual system flexibility needs.

## **2) Expected Accomplishments and Goals**

The result of the cyber security research can be envisioned as a threat-aware grid architecture capable of making real-time decisions to increase its survivability and resiliency.

CES-21 cyber security innovations and breakthroughs to be developed include:

- An open architecture for distributed threat detection and automatic, localized response:
  - with status reporting to peers,
  - permitting centralized maintenance,
  - aware of its environment and changes to it,
  - providing forensically sound evidence collection and handling for the use of law enforcement and intelligence services, and
  - including open and non-proprietary systems, algorithms, and workflows that provide a basis for a commercially viable prototype.
- Secure procedures and processes for the management, command, and control of industrial control system (ICS) defenses;
- Standard descriptive semantics for threats, responses, infrastructure, and processes;
- Models of industrial control systems within the IOUs' grid which are useful for further analyses; and
- Recommended responses to threats and threat types.

The grid integration research will develop new metrics to measure the probability that the IOU's grid system will be unable to ramp up and down quickly enough to meet the ramping events that are possible with high levels of renewables. When properly constructed and employed, such a metric could be used to assess the system's adequacy

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

and to provide insight as to the most efficient approaches to improving the system's ability to meet ramping events.

## **B. Scope of the Project**

### **1) Technical Objectives**

The cyber security research is intended to develop automated response capabilities to protect critical infrastructure against cyber-attacks, specifically advanced persistent threats. Due to the time criticality of these cyber-attacks, the only way to effectively protect the critical infrastructure will be through automated response capabilities.

Automated responses may take the form of:

- Network segmentation, disconnection, or segregation
- Traffic shaping, routing and firewalling
- Session termination and resets
- Traffic and application whitelisting
- System quarantining or disconnection
- Component reboot/reload
- Implementation of other automated response strategies

The grid integration research will define operating flexibility metrics and targets based on a probability measure of the occurrence, the magnitude, and the duration of ramping shortages at different time intervals. These metrics will be applied using production simulation and reliability models of the California system to determine their robustness under a wide range of realistic scenarios of weather conditions, and loads and renewable generation scenarios.

### **2) Division of Responsibilities and Tasks**

The following tasks, listed by work breakdown (WBS) level, will be executed during this CRADA. LLNL will monitor the progress of these tasks and provide a monthly report conforming to Exhibit 1 to the IOUs. The tasks and schedule are subject to change based on lessons learned, including incorporating items from Resolution E-4677 (leveraging existing work, non-duplication with other research, collaboration with other entities and proceedings) relevant to the Cyber Security and Grid Integration projects.

## **Project Area 1 - Cyber Security**

### **Task 1.1 Use Case Generation**

Develop R&D strategy for CES-21 overall and on a Spiral by Spiral development task level. This task will generate use cases for potential cyber security solutions to be developed in the CES-21 Cyber program. Project participants will meet with utility subject matter experts (SMEs) to learn about operational needs in cyber security, to learn about realities of operating the grid in a reliable and secure manner, and to solicit feedback on prototype technologies developed by the program. These meetings will be frequent during program initiation and then occur on a regular basis throughout the remainder of the program.

### **Task 1.2 Aggregate and Normalize Data**

The team will develop a comprehensive understanding of the IOU's ICS network architecture, devices on the network, and data available from network devices. Both IOU device catalogs and network mapping technology will be used to accomplish this. We will build a prototype data aggregator to collect ICS data pertinent to defending the network. Existing data models will be used where available and then extended or created to fill gaps. This task will continue at a low level throughout most of the project in order to stay current with new device and data types. Sensor usage within the Spiral development cycles will be part of the R&D use cases during later phases. This task will utilize LLNL intellectual property as defined in Appendix C.

### **Task 1.3 Modeling/Simulation**

We will start by defining a "Modeling/Simulation R&D Strategy" for the CES-21 Cyber program. Experts in modeling and simulation as well as IOU grid operators will team to determine what elements of modeling/simulation will be most beneficial to supporting other program tasks. Because modeling and simulation can be performed with many degrees of resolution (e.g. neighborhood, city, region, State of California) at varying levels of effort, we will investigate resolution requirements with grid operators and determine the optimal grid and or substation ICS representations for modeling/simulation. Reuse of CAISO or other models will be utilized where possible. Subsequent work will build and/or extend existing modeling/simulation tools to meet

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

requirements outlined in the “Modeling/Simulation R&D Strategy.” The modeling/simulation tools will then be used by other program tasks. This task will utilize open source and LLNL intellectual property as defined in Appendix C.

**Task 1.4 Establish Test Bed**

A test bed or multiple test beds are necessary to test prototype cyber security technologies. The team will evaluate existing test beds at the IOUs, national laboratories, and colleges and universities. The most comprehensive and applicable test bed(s) will be selected for use by the CES-21 cyber security research team for testing newly developed defensive technologies and investigating grid behavior in a controlled non-production environment. New test bed capabilities may be developed where gaps are identified.

**Task 1.5 Advanced Threat Detection**

This task will focus on detection of “zero-day” or unknown cyber threats to ICS networks. This task is a low-level effort aimed at developing case studies to guide detection of heretofore unseen threats, building prototype algorithms to identify and detect them, and developing a research plan that outlines options for future investigation of this area. Interface to CRISP will need ICS ATD. This task will utilize LLNL intellectual property as defined in Appendix C.

**Task 1.6 Standardized Indicator Language**

Cyber indicators are already being distributed by government entities and private industry though a common data format has not been established. This task will evaluate the most used indicator languages and choose one for use within the CES-21 Cyber program. We will attempt to influence industry groups and decision-makers where appropriate to use a common language for data exchange. We may identify and analyze current indicator languages available today, chose and adapt the chosen language further to encompass additional needs that the IOUs have for such a technology. The team will share any modifications to the chosen standard with the original author and community.



**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

Task 1.7 Software/Device Vulnerability Analysis

This task will focus on finding latent vulnerabilities in ICS device software using novel techniques. This task is a low-level effort that will investigate the existing tools in this field, build a prototype tool, and develop an R&D roadmap that outlines options for future investigation of this area.

Task 1.8 Tools for Course of Action Analysis

We will investigate and develop technologies for taking defensive actions on ICS devices. The team will work closely with the IOUs to ensure logic for automated and semi-automated responses meshes with their grid operation workflow. This task will utilize LLNL intellectual property as defined in Appendix C.

Task 1.9 Generate Defensive Actions

This task will focus on making changes to ICS networks in the face of cyber threats. The team will survey existing automated response systems for ICS networks (if any), work with grid operators to build a catalog of potential defensive actions, develop response actions, test those actions on our test bed network(s) and/or modeling/simulation framework, and integrate them into grid operations.

Task 1.10 Secure System Interface Environment

Research and identify a secure system interface environment for energy systems and sensors. As sensors grow across the intelligent smart grid an interface environment is needed that will allow for simple sensor interfaces and provide a high level of security and cyber protection for system sensors. Interfaces are typically expensive to develop and maintain. Sensor replacement, changes to existing sensor firmware and the addition of new sensors often require interface upgrades or changes. This process can be costly and may delay sensor implementation while the interface is developed/upgraded, tested, implemented and introduce vulnerabilities. This task will research a common, secure interface environment that can function as a cybersecurity component that enhances overall security objectives.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

Task 1.11 MMATR Integration

The program will be executed using a spiral development methodology enabling resources to be quickly focused in areas that are yielding results. The main integration timeline is set in 6-month R&D cycles with each cycle culminating in an internal review.

**Project Area 2 - Grid Integration**

Task 2.1 Definition of problem and needed tools

Define the problem and review methodologies and analytical tools that could be used to solve the problem. The purpose of this initial step is to develop a clear description of the analytical framework that will be used to design a methodological and modeling approach to design flexibility metrics.

Traditional reliability modeling addresses the analytical question regarding the amount of capacity that satisfies a reliability target such as a one day in 10 years outage expectation or that equalizes the cost of adding new generation resources with the corresponding reduction in outage costs. This question is addressed in a stochastic environment where shortfalls in available generating capacity relative to customer load are assessed based on distributions of weather conditions driving customer loads and generating unit unavailability. In a generating system in which there is a substantial risk of customer outages or equipment damage due to insufficient operating flexibility to balance loads and resources (even when there is enough capacity overall), resource expansion questions need to consider not only capacity shortfalls and but also operating flexibility shortfalls such as insufficiently ramping up and down capability to balance loads and resources, as well as the cost of meeting these shortfalls with changes in unit commitment or dispatch, or operating flexibility policies or standards. The question of what operating flexibility metrics and targets to use for planning will be addressed in a stochastic environment that additionally considers the weather uncertainty affecting loads and intermittent resources.

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

**Task 2.2 Base model selection**

Based on the characteristics identified in the prior Task 2.1, a base model will be selected. In this task, the team will review and critique existing flexibility metrics and tools now in use and under development by the utilities, CAISO, and others to identify flexibility needs. Initially, the Plexos software from Energy Exemplar (“Plexos”) will be used as the base model given CAISO’s and IOUs’ experience with the model and LLNL’s past use of Plexos for its probabilistic analysis of demand response and energy storage. The IOU and LLNL Program Managers may mutually agree to change the base model depending upon the results of Task 2.1.

**Task 2.3 Generate multiple weather dependent data**

Leverage LLNL’s previous work with the Weather Research and Forecasting (WRF) model and use WRF to reproduce a range of temperature, wind and solar conditions prevailing in California and the Western Electricity Coordinating Council (WECC) for 30 scenarios to build 6 weather ensembles for each of two different weather years. Leveraging LLNL’s scripts already developed, weather parameters for these scenarios will be used to generate load, wind and solar generation for simulations in the base model chosen in Task 2.2. Load and intermittent generation would have 5 minute interval inputs. This task will utilize Open Source and LLNL Intellectual Property.

**Task 2.4 Automated running of scenarios**

Set up the base model so it can be run in batch mode with predefined scenarios. Use this to produce a list of scenarios of output that can be analyzed by hand, and later with the use of the prototype code developed in later tasks of the grid integration project, and used to begin gaining insight into what the long term procurement plan should look like. Develop methods to automate storage of the results into a database or other convenient form for subsequent analysis. The scenarios will then be aggregated and weighted based on the weight assumed for each weather year. Plexos will perform a day-ahead unit commitment and 5 minute economic dispatch. Instead of using a stochastic unit commitment considering the 30 weather scenarios available for an hour of a weather year, each of the 30 scenarios will be run separately considering

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

Monte Carlo outages and operating flexibility requirements calculated based on the uncertainty represented by the 30 scenarios in a weather year.

**Task 2.5 Definition of flexibility metrics**

Based on the previous Task 2.4 results, LLNL and the IOUs will identify and develop or extend appropriate models and simulation codes – leveraging existing products whenever possible. Methods will help determine which metrics can best communicate the IOU grid system’s flexibility requirements, and how the metrics can then be adjusted or changed as necessary in the future as the grid system changes. In this task, the team will review prior flexibility metrics used by CAISO, utilities and others to represent the flexibility requirements of the system that need to be considered for commitment and dispatch purposes.

**Task 2.6 Prototype model to calculate metrics**

Develop a prototype model as stand-alone code intended to calculate the supply and demand for flexibility for the selected metrics, the expected deficiencies and probability of deficiencies of flexible capacity. In this task, the code will be used to track and calculate the flexibility metric deficiencies, but will not yet be integrated with the unit-commitment and dispatch model. The inputs to the metrics prototype are: (1) the unit commitment and dispatch coming out of a base model simulation run, showing the available flexible capacity to meet the flexibility requirements at different time intervals (such as every hour or 15 minutes) for different time horizons (such as 5 min, 15 min, 1 hour, 2 hours, etc.), and (2) the distribution of loads and intermittent generation at the end of each time horizon for each of the 30 weather paths considered in each weather year from which the demand for flexibility is calculated for each time horizon. The output is the expected amount of various types of “flexibility not served” in MW per hour considering the 30 weather scenarios, and the probability of any flexibility not being served. Both upward and downward flexibility metrics will be calculated for various assumed flexibility standards to inform a future development of flexibility standards.

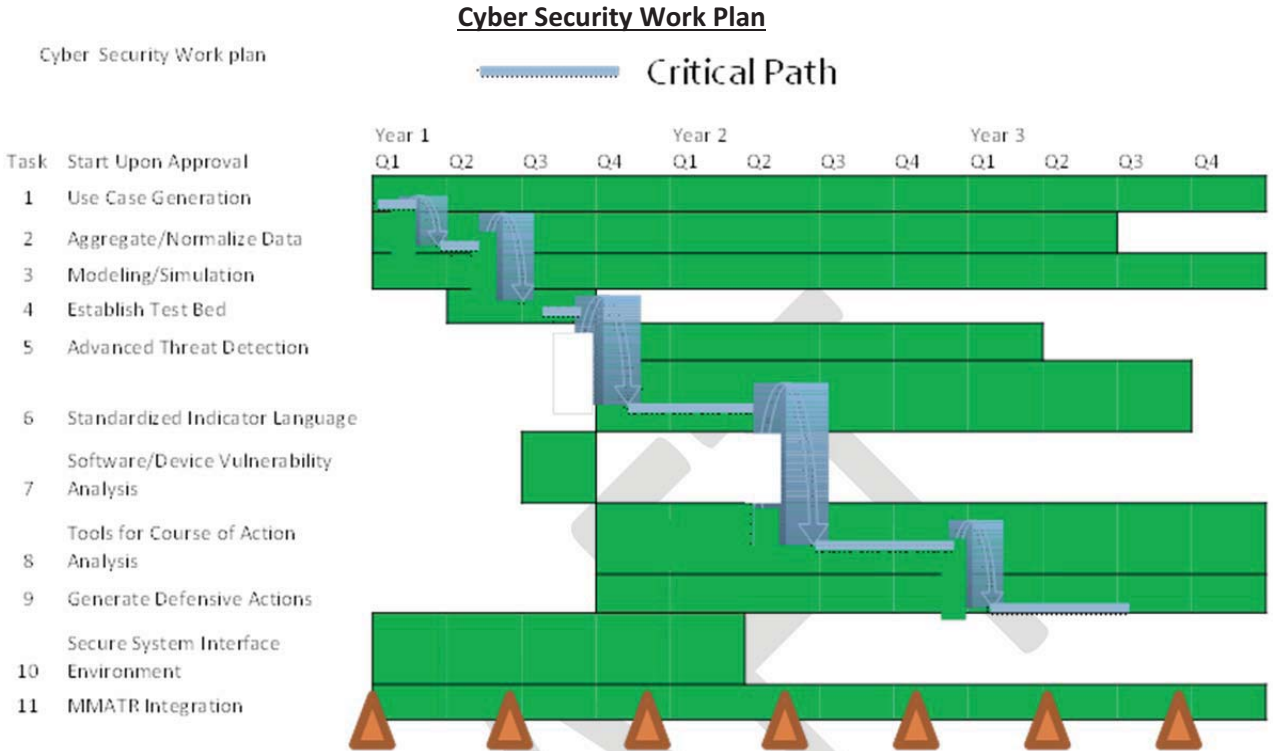
**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

- Task 2.7 Integrate flexibility metrics in base model  
LLNL will develop a prototype optimization infrastructure following an iterative process using LLNL's HPC with software that: 1) takes the inputs from the unit commitment and dispatch model and from the flexibility metric prototype model developed in prior phases, and 2) decides whether to change the unit commitment and dispatch to minimize costs after satisfying the flexibility targets given the marginal cost of flexibility. The goal is to integrate the selected flexibility targets into a larger optimization which can be solved on workstations used by the IOUs, CAISO and other parties in 4 hours per weather year. LLNL will suggest ways to reduce run time by: 1) clustering the 30 weather scenarios into 6 scenarios, and 2) simplifying the representation of the system without losing significant accuracy.
- Task 2.8 Test of model and sample analysis  
The results from the integrated optimization Task 2.7 will be tested and evaluated. Further adjustments to the integrated optimization code may be necessary as part of this task. As a first step in validation, LLNL will run the new flexibility metrics on two very different grid configurations (such as vastly different amounts of non-dispatchable generation). The metrics should reveal a difference. For the purposes of this CES-21 grid integration work, evaluation criteria will be qualitative. Additionally, the team will develop an approach for conducting more rigorous quantitative validation, including metrics sensitivity to inputs.
- Task 2.9 Prepare model for use  
LLNL and the IOUs will develop user documentation as prototype versions are developed and tested, and assembled into a single document for users in the last two months of the CES-21 grid integration project.

**Project Area 3 - Project Close-out**

- Task 3.1 Final reporting  
LLNL and IOUs will prepare the final report and abstract due within thirty (30) days of completion or termination of the project, as required under Article XI of the CRADA.

**C. Estimated Schedule**



Steering Committee examines output of every “sprint” and redirects research as needed. Failure of any effort may increase or decrease focus on or even ‘off -ramp’ of other tasks. Decisions documented in PM report for each “sprint”.

**Grid Integration Work Plan**

Phase	Phase Name	Year 1				Year 2	
		Q1	Q2	Q3	Q4	Q1	Q2
1	Definition of problem and needed tools	█					
2	Base models election	█					
3	Infrastructure to generate multiple weather data	█	█	█			
4	Infrastructure to automate the running of scenarios	█	█	█			
5	Definition of flexibility metrics	█	█	█			
6	Prototype model to calculate metrics				█	█	
7	Integration of flexibility metrics in model					█	█
8	Test model and sample results					█	█
9	Document model and sample results					█	█
10	Meet with Advisory Group	Δ				Δ	
						Δ	
							Δ

**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

**D. Estimated Deliverables**

The first name listed under “Responsible” has the primary responsibility for completion of the deliverable with support the other names listed.

<b>WBS</b>	<b>Description</b>	<b>Due Date</b>	<b>Responsible</b>
<b>1</b>	<b>Cyber Security</b>		
1.11	Document describing spiral 1 results	Y1Q2	LLNL/IOUs
1.11	Document describing spiral 2 results	Y1Q4	LLNL/IOUs
1.11	Document describing spiral 3 results	Y2Q2	LLNL/IOUs
1.11	Document describing spiral 4 results	Y2Q4	LLNL/IOUs
1.11	Document describing spiral 5 results	Y3Q2	LLNL/IOUs
1.11	Document describing spiral 6 results	Y3Q4	LLNL/IOUs
1.11	Final cyber security project report	Y3Q4	LLNL/IOUs
<b>2</b>	<b>Grid Integration</b>		
2.8	Document describing the model and end of grid integration project report available	Y2Q2	LLNL/IOUs
<b>3</b>	<b>Project Close-out</b>		
3.1	Final Report and Abstract	Y3Q4	LLNL/IOUs

**E. Limitations of Time or Resources**

None

**F. Estimated Cost to Each Party**

	<b>Funds-in to LLNS and Subcontractors</b>	<b>In-Kind Contribution</b>	<b>Total</b>
PG&E	\$12,361,000	\$5,139,000	\$17,500,000
SCE	\$9,784,000	\$4,566,000	\$14,350,000
SDG&E	\$2,205,000	\$945,000	\$3,150,000
<b>Total</b>	<b>\$24,350,000</b>	<b>\$10,650,000</b>	<b>\$35,000,000</b>

The total cost estimate for this thirty-six (36) month CRADA project is Thirty-Five Million Dollars (\$35,000,000).

**G. Property**

Any property procured for this CES-21 project will have an appropriate disposition plan agreed upon by the IOUs’ and LLNL’s Project Managers prior to the procurement being made. A final property list will be included in the Final Report for the CES-21 Project.

## **H. Contacts for each Party**

### **1) LAWRENCE LIVERMORE NATIONAL SECURITY**

Industrial Partnerships Office  
7000 East Avenue  
P. O. Box 808, L-795  
Livermore, CA 94551

IPO Contact: Charity Follett, L-795  
Tel: (925) 422-1817  
Fax: (925) 423-8988  
Email: follett2@llnl.gov

Technical Contact: Jamie Van Randwyk, L-177  
Tel: (925) 423-5307  
Fax: (925) 423-8123  
Email: vanrandwyk1@llnl.gov

### **2) PACIFIC GAS & ELECTRIC**

77 Beale Street  
San Francisco, CA 94177

Program Manager: Suna Taymaz  
Tel: (415) 972-5334  
Email: sgt5@pge.com

Administrative/Legal: David Bayless  
Tel: (415) 973-4391  
Email: dpb5@pge.com

### **3) SAN DIEGO GAS & ELECTRIC**

8326 Century Park Court  
San Diego, CA 92123

Program Manager: Corey McClelland  
Tel: (619) 260-4304  
Email: CMcClelland2@semprautilities.com

Administrative/Legal: Gary Perlmutter  
Tel: (619) 699-5075  
Email: GPerlmutter@sempra.com



**This draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

**4) SOUTHERN CALIFORNIA EDISON**  
2244 Walnut Grove Avenue  
Rosemead, CA 91770

Program Manager: Joy Weed  
Tel: (626) 543-6415  
Email: joy.weed@sce.com

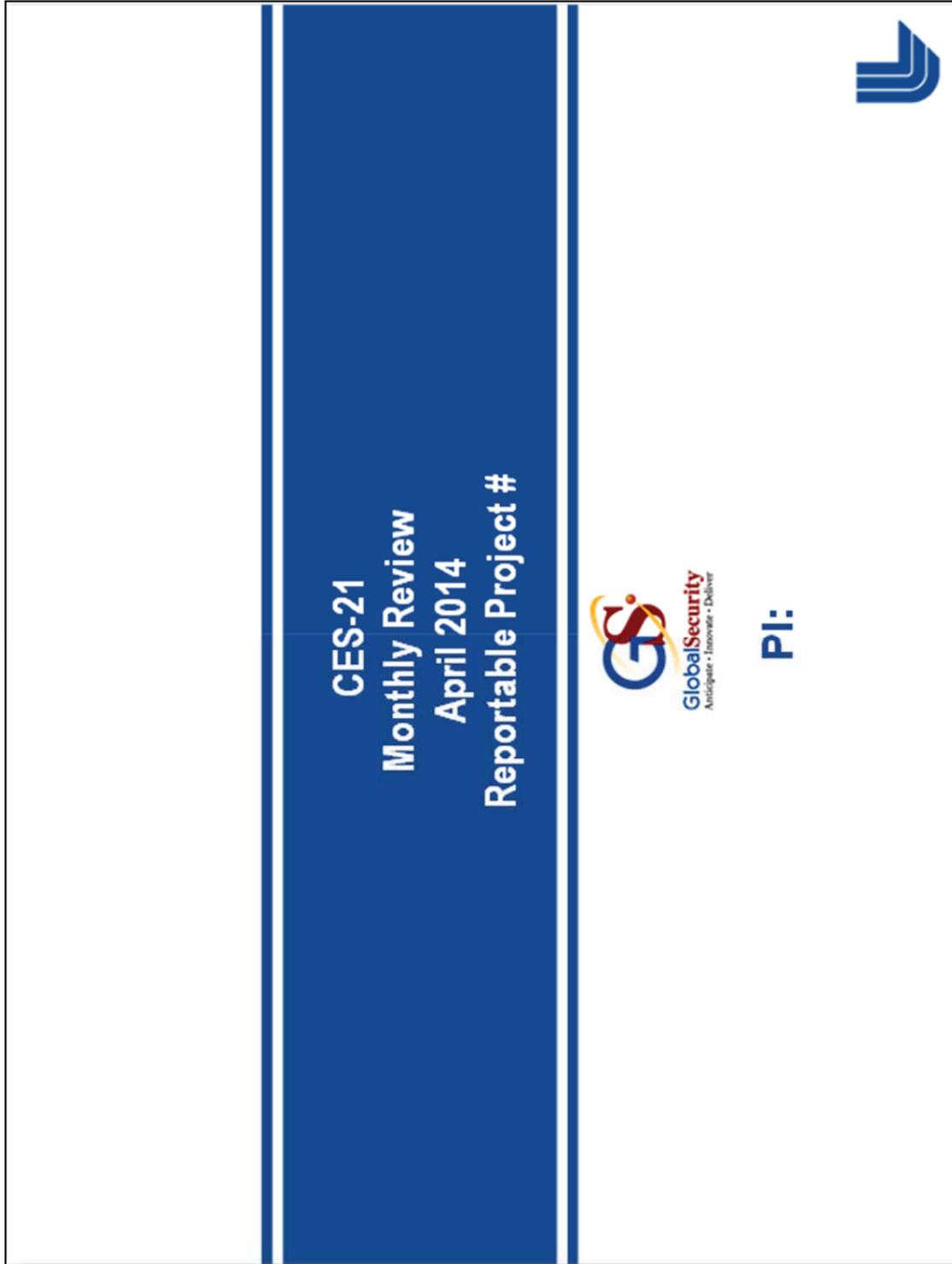
Administrative/Legal: Florence Pinigis  
Tel: (626) 302-3959  
Email: Florence.Pinigis@sce.com

DRAFT

This draft CRADA is preliminary and is subject to approval by the National Nuclear Security Administration.

## Exhibit 1

### Sample Monthly Report



<p><b>Project Name: CES-21</b>  <b>GS Program / PL Area: E/ARC</b></p> <p><i>Project Objectives</i></p> <ul style="list-style-type: none"> <li>&gt; Brief description of the project</li> </ul> <p><i>Monthly Accomplishments</i></p> <ul style="list-style-type: none"> <li>&gt; Bulleted list of monthly accomplishments</li> <li>&gt;</li> <li>&gt;</li> </ul>	<div style="text-align: right; font-size: small; margin-bottom: 10px;">             PL's Evaluation of Project Status         </div> <div style="text-align: center; margin-bottom: 10px;"> <span style="background-color: green; color: white; padding: 2px 5px; font-weight: bold;">G</span> </div> <p style="text-align: center; font-weight: bold; margin-bottom: 10px;">             Monthly Snapshot: April 2014              Reportable Project:         </p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th colspan="2">Project Status</th> </tr> <tr> <th style="width: 30%;">Category</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>Scope</td> <td style="background-color: green; color: white; font-weight: bold;">G</td> </tr> <tr> <td>Schedule</td> <td style="background-color: green; color: white; font-weight: bold;">G</td> </tr> <tr> <td>Budget</td> <td style="background-color: green; color: white; font-weight: bold;">G</td> </tr> </tbody> </table> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 80%;">Specific Project Issues</th> </tr> </thead> <tbody> <tr><td>Sponsor</td></tr> <tr><td>Manpower</td></tr> <tr><td>Funding</td></tr> <tr><td>Safety</td></tr> <tr><td>Security</td></tr> <tr><td>Facilities / IT</td></tr> <tr><td>Other</td></tr> </tbody> </table>	Project Status		Category	Status	Scope	G	Schedule	G	Budget	G	Specific Project Issues	Sponsor	Manpower	Funding	Safety	Security	Facilities / IT	Other
Project Status																			
Category	Status																		
Scope	G																		
Schedule	G																		
Budget	G																		
Specific Project Issues																			
Sponsor																			
Manpower																			
Funding																			
Safety																			
Security																			
Facilities / IT																			
Other																			
<p><i>Project Attributes</i></p> <ul style="list-style-type: none"> <li>&gt; Overall Project Budget : \$</li> <li>&gt; Project Duration:</li> <li>&gt; Anticipated follow-on funding: \$</li> <li>&gt; Funding Office:</li> <li>&gt; Sponsor Program Manager:</li> <li>&gt; Program Manager:</li> <li>&gt; Program Leader:</li> <li>&gt; Principal Investigator:</li> <li>&gt; Chief Engineer:</li> </ul>																			

This draft CRADA is preliminary and is subject to approval by the National Nuclear Security Administration.

Project Plan	FY14												FY15											
	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S
Tasks																								
T1																								
T2																								
T3																								
T4																								
T5																								
Deliverables																								

Task Status			Deliverable Status			
Tasks	Description	% Done	Deliverable	Description	% Done	Date Done
T1	Task 1 description	0	D1	D1 description	0	
T2	Task 2 description	0	D2	D2 Description	0	

Milestone /Project at Risk	Elevated Risk (requires attention)	No excessive risk	Completed
----------------------------	------------------------------------	-------------------	-----------

**APPENDIX B**  
**Energy Science and Technology Software Center**  
**Abstract Format**

**Related to LLNL Case No. TC02200.0**

*1. Identification*

Provide the following two fields to be used to uniquely identify the software. The software acronyms plus the short or KWIC (keywords in context) title will be combined to be used as the identification of the software.

Software Acronym (limit 20 characters). The name given to the main or major segment of module package usually becomes the name of the code package. If an appropriate name is not obvious, invent one which is related to the contents.

Short or KWIC title (limit 80 characters). This title should tell something of the nature of the code system: calculational method, geometry, or any feature that distinguishes this code package from another. It should be telegraphic in style, with no extraneous descriptors, but more than a string of keywords and phrases. The word "code" (alone) and "program" do not belong in a description of a code "package".

*2. Author Name(s) and Affiliations*

List author(s) or contributor(s) names followed by the organizational affiliation. If more than one affiliation is applicable, please pair authors with their affiliations.

*3. Software Completion Date*

List approximate date(s) that the version of the executable module(s), which will be created by the submitted program modules, was first used in an application environment.

*4. Brief Description*

Briefly describe the purpose of the computer program, state the problem being solved, and summarize the program functions and capabilities. This will be the primary field used for announcement purposes.

*5. Method of Solution*

Provide a short summary of the mathematical methods, engineering principles, numerical algorithms, and procedures incorporated into the software.

*6. Computer(s) for Which Software is Written*

List the computer(s), i.e., Unix, Windows, Apple, etc. on which this submittal package will run.

*7. Operating System*

Indicate the operating system used, release number, and any deviations or exceptions, i.e., is the operating system "off the shelf" with no modifications, or has the operating system been modified/customized. If modified, note modifications in field 11.

*8. Programming Language(s) Used*

Indicate the programming language(s) in which the software is written along with approximate percentage (in parentheses) of each used. For example, C++ (95%), Assembler (5%).

*9. Software Limitations*

Provide a short paragraph on any restrictions implied by storage allocation, such as the maximum number of energy groups and mesh points, as well as those due to approximations used, such as implied argument-range limitations. Also to be used to indicate the maximum number of users, etc. or other limitations.

#### 10. *Unique Features of the Software*

Highlight the advantages, distinguishing features, or special capabilities which may influence the user to select this package over a number of similar packages.

#### 11. *Related and Auxiliary software*

If the software supersedes or is an extension of earlier software, identify the original software here. Identify any programs not considered an integral part of this software but used in conjunction with it (e.g., for preparing input data, plotting results, or coupled through use of external data files). Note similar library software, when known.

#### 12. *Other Programming or Operating Information or Restrictions*

Indicate file naming conventions used, e.g., (filename), DOC (DOC is a filename extension normally used to indicate a documentation file), additional subroutines, function libraries, installation support software, or any special routines required for operation of this package other than the operating system and programming language requirements listed in other fields. If proprietary software is required, this should also be indicated.

#### 13. *Hardware Requirements*

List hardware and installation environment requirements necessary for full utilization of the software. Include memory and RAM requirements, in addition to any nonstandard features.

#### 14. *Time Requirements*

Include any timing requirement estimations, both wall clock and computer clock, necessary for the execution of the package. Give enough detail to enable the potential user to estimate the execution time for a given choice of program parameters (e.g., 5-10 min.).

#### 15. *References*

List citations of pertinent publications. List (by author, title, report, bar code or order number if available, and date). References are to be broken down into two groupings.

- (a) Reference documents that are provided with the submittal package.
- (b) Any additional background reference materials generally available.

#### 16. *Categorization and Keywords*

Subject Classification Code - chosen from the Subject Classification Guide (Appendix E of ESTSC-I), this one-letter code designation is to be supplied by the submitter.

KEYWORDS : Submitters should include keywords as taken from the ESTSC thesaurus listing (Appendix F of ESTSC-I). Keywords chosen that are not on the list will be subject to ESTSC approval before being added to the thesaurus. Subsequent revision lists will be available. ESTSC may also add additional keywords to aid in the indexing of the material.

#### 17. *Category*

The subject classification chosen for the Center subject classification guide is shown.

KEYWORDS: This is a listing of the keywords associated with the program, supplied by the program author and/or Center, based on the Center Thesaurus.

#### 18. *Sponsor*

This is the name of the program office or division and the agency responsible for funding the software development effort.

## **APPENDIX C**

### **Background Intellectual Property**

#### **Related to LLNL Case No. TC02200.0**

Each Party may use any other Party's Background Intellectual Property identified hereunder solely in performance of research under the Statement of Work. This CRADA does not grant to any Party any option, grant, or license to commercialize, or otherwise use another Party's Background Intellectual Property. Licensing of Background Intellectual Property, if agreed to by the Parties, shall be the subject of separate licensing agreements between the Parties.

#### **Lawrence Livermore National Security**

LLNL has reviewed its files and notes the following Background Intellectual Property:

#### **U.S. Patents and Patent Applications**

U.S. Patent Application No. 13/801931, entitled "Fast Data-Driven Network Mapping," filed March 13, 2013 (LLNL Tracking No. IL12642)

#### **Copyrights**

FOQUS v1.0 (LLNL Tracking No. CP01673)

Network Intrusion Detector (NID), version 2.2 (LLNL Tracking No. CP00587)

NetSim, ns-3-contrib (LLNL Tracking No. CP01733)

Operational Weather Forecast Scripts (OWFS) (LLNL Tracking No. CP01459)

Operational Wind and Solar Generation Forecast Scripts, v1.0 (LLNL Tracking No. CP01743)

PSUADE, v1.0 (LLNL Tracking No. CP01253)

PSUADE, v1.1.0 (LLNL Tracking No. CP01310)

PSUADE, v1.2 (LLNL Tracking No. CP01375)

PSUADE, v1.3 (LLNL Tracking No. CP01423)

PSUADE, v1.4 (LLNL Tracking No. CP01515)

ROSE 1.0 (LLNL Tracking No. CP01057)

Weather Research and Forecasting Model v2.2 with Reconstruction and Improved Subgridscale Turbulence Models (WRF-RISTM), v1.0 (LLNL Tracking No. CP01269)

Weather Research and Forecasting Model v2.2 with Reconstruction and Improved Subgridscale Turbulence Models (WRF-RISTM), v2.0 (LLNL Tracking No. CP01315)

**The draft CRADA is preliminary and is subject to approval by the  
National Nuclear Security Administration.**

Weather Research and Forecasting Model with the Immersed Boundary Method (IBM-WRF)  
v2.0 (LLNL Tracking No. CP01554)

Weather Research and Forecasting Model with the Immersed Boundary Method (IBM-WRF)  
v3.0 (LLNL Tracking No. CP01555)

Weather to Renewable Generation Toolkit (LLNL Tracking No. CP01741)

Pacific Gas & Electric has reviewed its files and notes the following Background Intellectual  
Property:

None

**San Diego Gas & Electric**

San Diego Gas & Electric has reviewed its files and notes the following Background Intellectual  
Property:

None

**Southern California Edison**

Southern California Edison has reviewed its files and notes the following Background  
Intellectual Property:

None



**Advice 2656-E  
(San Diego Gas & Electric ID U 902-E)**

**Advice 4516-E  
(Pacific Gas and Electric Company ID U 39 E)**

**Advice 3115-E  
(Southern California Edison Company ID U 338 E)**

## ATTACHMENT C

LLNL Letter on Cyber Security Research Projects

October 9, 2014

Dear Mr. Paul Clanon,

As requested by California Public Utilities Commission Resolution E-4677 this letter confirms that the proposed MMATR (Machine to Machine Automated Threat Response) research parameters reflect a new contribution to cybersecurity and that MMATR will not duplicate research being done by other private and governmental entities.

Our assessment was based on subject matter experts (SMEs) from the three IOUs and LLNL who visited national laboratories, universities, and technical industry conferences. The team presented draft versions of the MMATR business case on several of their visits and received valuable input as to the direction of the program. In addition, the team was able to get updates on complimentary state-of-the art research and development underway at other institutions, which helped guide further development of the business case.

LLNL coordinated review of the MMATR business case with DOE OE's (Department of Energy Office of Electricity Delivery and Energy Reliability) CEDS (Cyber Security for Energy Delivery Systems) program, which has sector specific responsibility for cyber security in the energy critical infrastructure. The proposed work was reviewed against the CEDS *Roadmap to Achieve Energy Delivery Systems Cybersecurity* in order to focus the R&D on meaningful problems and avoid duplication with other organizations. The SME team coordinated writing of the MMATR business case so that it specifically filled gaps identified in the roadmap.

After the above noted visits, conversations, and extensive reviews, we believe the proposed MMATR research parameters do indeed reflect a new contribution to cybersecurity and that MMATR, as proposed, will not duplicate research being done by other private and governmental entities.

Sincerely,

Robert Burlison  
E Program Manager  
Lawrence Livermore National Laboratory

**Advice 2656-E**  
**(San Diego Gas & Electric ID U 902-E)**

**Advice 4516-E**  
**(Pacific Gas and Electric Company ID U 39 E)**

**Advice 3115-E**  
**(Southern California Edison Company ID U 338 E)**

## **ATTACHMENT D**

Joint Utility Report on the Scope of the CES-21 Program's Proposed Research Projects

# Joint Utility Report on the Scope of the CES-21 Program's Proposed Research Projects

October 9, 2014

As required by Senate Bill 96, Public Utilities Code Section 740.5 (e)(1),  
and Commission Decision 14-03-029

## 1. Introduction

On September 26, 2013, Governor Brown signed Senate Bill (SB) 96, which among other things, limits the scope of the California Energy Systems for the 21<sup>st</sup> Century (CES-21) program, as previously approved by the California Public Utilities Commission (Commission) in Decision (D.) 12-12-031, to cyber security and grid integration research and development projects not to exceed \$35 million over a five year period. As part of SB 96, the California legislature directed the Commission to require the Joint Utilities – Pacific Gas and Electric Company (PG&E), Southern California Edison Company (SCE), and San Diego Gas & Electric Company (SDG&E) – to prepare and submit a joint report by December 1, 2013. A joint report was submitted on November 27, 2013. It was rejected by the Commission on December 20, 2013 and the Joint Utilities were subsequently directed to resubmit its joint report within 30 days of the adoption of D.14-03-029.<sup>1</sup> In compliance with this legislative directive, this Joint Utility Report describes (1) the scope of all proposed research projects, (2) how the proposed projects may lead to technological advancement, (3) how the proposed projects may lead to potential breakthroughs in cyber security and grid integration, and (4) the expected timelines for concluding the projects.<sup>2</sup>

On March 27, 2014, the Commission approved D.14-03-029, which modified D.12-12-031 to comply with SB 96. In this decision, the Commission:

- Reduces the CES-21 budget to \$35 million (including “franchise fees” and “uncollectibles”) over a five-year period;<sup>3</sup>
- Limits areas of research to “cyber security” and “grid integration”;<sup>4</sup>
- Modifies the cost allocation to PG&E – 50%, SCE – 41%, and SDG&E – 9%;<sup>5</sup>
- Reduces the governance structure to three Project Managers from PG&E, SCE, and SDG&E;<sup>6</sup>
- Voids any CES-21 program management expenditures incurred to date and caps future administrative expenses to no more than 10% of the total CES-21 budget;<sup>7</sup>

---

<sup>1</sup> D.14-03-029, OP 16.

<sup>2</sup> SB 96, Public Utilities Code Section 740.5 (e)(1).

<sup>3</sup> D.14-03-029, OP 2.

<sup>4</sup> Id.

<sup>5</sup> Id., OP 6-8.

<sup>6</sup> Id., OP 9.

<sup>7</sup> Id., OP 10.

- Requires enhanced Legislative and Commission oversight of the CES-21 Program;<sup>8</sup> and
- Revises the CRADA guidelines and project criteria accordingly.<sup>9</sup>

This Report describes two multi-year research and development projects that are being proposed at this time. As established by SB 96 and D.14-03-029, one project is in the area of cyber security and the other is in the area of grid integration. Consistent with the general process established in D.12-12-031 and clarified in D.14-03-029, the Joint Utilities submitted a Tier 3 advice letter on April 25, 2014, that includes business cases for these two proposed multi-year research and development projects. The Commission approved those projects in Resolution E-4677 on October 2, 2014. Those business cases provide more information on the topics addressed in this report.

## **2. Cyber Security and Grid Integration**

As a national energy policy leader, it is critically important for California to support cutting edge research and development (R&D) in the areas of cyber security and grid integration. Cyber-attacks against critical infrastructure are increasing in frequency and sophistication at an alarming rate. Technologies currently used to protect our grid infrastructure against such attacks can be improved upon to deal with these emerging threats. The proposed research is designed to develop automated response capabilities using innovative cyber security and grid technology. This research will analyze grid-connected cyber systems to develop a defense against cyber threats that would be pervasive throughout a more thoroughly integrated grid. Research and development is needed to create a threat-aware grid architecture capable of making real-time decisions in order to increase survivability and resiliency.

Similarly, the challenges of grid integration, particularly with respect to grid integration of renewable resources, are an important area for further research in order to move from the current levels of renewable resource integration to a much larger scale of renewable integration, even above the levels required to meet California's Renewable Portfolio Standard of 33% renewables integration by 2020.

### **2.a. Scope of Proposed Research Projects**

#### **i. Cyber Security**

Fundamental research in industrial control systems (ICS) for utility cyber security is lacking currently. Valuable future research topics include:

- Automatic detection of advanced threats given indicators;
- Automated response to threats;
- Operating ICS infrastructure in the face of constant attack (how to build a "resilient" grid); and

---

<sup>8</sup> Id., 14-16, 20-21.

<sup>9</sup> Id., OP 13.

- Modeling and simulation of threats and response scenarios

The proposed cyber security research for CES-21 is focused on developing automated response capabilities to protect critical California infrastructure against cyber-attacks. Due to the time criticality of these cyber-attacks, the best way to effectively protect the critical infrastructure will be through automated, machine-to-machine communications to assess key indicators and develop appropriate responses. However, developing such automated machine-to-machine defenses is a very ambitious goal and it is uncertain where the research will lead. The research team will have flexibility to change direction depending on preliminary research results and findings. Such a dynamic approach will improve the chance of success in discovering new and innovative approaches, products, and solutions to emerging cyber security threats. Cyber security is a broad research topic and having a flexible approach to the R&D effort will have a positive effect on the outcome of the research.

## ii. Grid Integration

Grid integration is a “cross cutting” research category that relates to electric resource planning and electric system operations, two of the four original research categories previously adopted in D.12-12-031. The challenges of grid integration, particularly with respect to grid integration of renewable resources, are widely recognized as an important research area for the state. In particular, in order to achieve important environmental goals, California’s electric system is going through a significant transformation, replacing conventional generation with increasing amounts of intermittent renewable resources, and other resources that have limited operating flexibility.

While all of the research topics proposed by the utilities under the electric resource planning and electric system operations categories enable improved grid integration of renewable resources, the Flexibility Metrics and Standards project, as previously proposed, is anticipated to provide benefits to customers through improved long term resource planning.

In light of the revised research funding level established by SB 96, the utilities have narrowed the scope of the initially proposed Flexibility Metrics and Standards project. Specifically, the Flexibility Metrics and Standards project is intended to:

1. Review and critique existing flexibility metrics and tools now in use or under development by the utilities, CAISO, and others to quantify operating flexibility requirements and the residual resource needs not met by existing or already planned resources;
2. Define new flexibility metrics, potentially novel ones, such as insufficient ramping capacity, that a system requires to balance loads and resources during different time intervals.
3. Identify how to operationalize the flexibility metrics for long-term planning purposes, either as separate metrics or combined with existing reliability metrics, such as loss of load expectation (LOLE) or PRM requirement.
4. Recommend whether new operating flexibility standards or modified reliability standards should be adopted to incorporate the increased need for operating flexibility with greater amounts of intermittent generation ; and
5. Develop new prototype models or improvements to existing resource planning models that incorporate the proposed flexibility metrics with traditional production simulation and reliability

models for use in evaluating the cost-effectiveness of different alternatives to meet identified system needs.

## **2.b. How the Proposed Projects May Lead to Technological Advancement in Cyber Security and Grid Integration**

Automated threat detection and response are areas that have been and continue to be heavily studied in the traditional enterprise cyber security space. These areas are virtually unstudied in industrial controls systems (ICS). With respect to grid operations, new operating flexibility metrics and targets are needed for effective long-term resource planning in California. The proposed research and development projects will bring automated threat detection and response to the ICS environment and improvements to planning methodologies and models will be used to improve the integration of renewable resources.

Cyber security as applied to ICS is a nascent industry and is ripe for research and development. Open research topics include: detection of advanced threats, detection of previously unknown threats ("zero-day vulnerabilities"), automated response to threats, operating ICS infrastructure in the face of constant attack (i.e., how to build a "resilient" grid), modeling and simulation of threats and response scenarios, and vulnerability assessments and supply chain analyses of grid components.

The Joint Utilities propose conducting R&D in several of these areas, integrating existing technologies where applicable and performing applied research when necessary. A goal of this research is to advance the state-of-the-art in automated threat detection and response as well as modeling and simulation in support of grid resiliency.

The proposed Grid Integration Planning Flexibility Metrics and Standards project will help quantify the future operating flexibility requirements of the system and determine the needs for operationally flexible resources, if any, in order to continue to provide reliable and affordable service to customers while at the same time meeting California's energy policy objectives.

Expected advances in grid integration include defining flexibility metrics (such as insufficient ramping capacity), operationalization of the flexibility metrics for long-term planning purposes, developing new or improved resource planning models that incorporate flexibility metrics with traditional production simulation and reliability models, developing new or improved tools to measure the contribution of different types of resources toward the system's flexibility requirements, and developing new or improved tools to determine the cost-effectiveness of different alternatives to meet identified system needs.

These proposed cyber security and grid integration projects will bring together the Utilities, all nationally recognized leaders, with Lawrence Livermore National Laboratory (LLNL), a Department of Energy (DOE) laboratory. This collaboration will, in turn, leverage state-of-the-art R&D and technologies being developed at other national laboratories and universities throughout California and the rest of the United States. It is fully expected that the integration of these technologies and subsequent research

and development will lead to technological advancement that will benefit the California grid and state ratepayers.

## **2.c. How the Proposed Projects May Lead to Potential Breakthroughs in Cyber Security and Grid Integration**

### **i. Cyber Security**

The goal of this research is a context-aware California electric grid capable of making real-time decisions in response to cyber threats that increase its survivability and resiliency. Potential breakthroughs are expected in:

- Standard descriptive semantics for threats, responses, infrastructure, and processes;
- A secure approach to management, command, and control of the defenses;
- A standard, open architecture for distributed threat detection and automatic, localized response that provides a basis for commercially viable prototypes;
- Modeling and simulation tools for cyber defense of ICS networks; and
- Recommended responses to threats and threat categories.

### **ii. Grid Integration**

New operating flexibility metrics are needed for long-term resource planning in California. Improvements to methodologies and existing models, or new models, are also needed to reduce the cost and the uncertainty about the resource adequacy of existing and planned resources to integrate greater amounts of intermittent renewables. Improvements to methodologies and models are also needed to facilitate the consideration and decision making in regulatory and stakeholder processes of planning issues related to the integration of renewable resources, including: (a) quantification of system operating requirements, (b) estimates of the contribution of different resources to meet those requirements, (c) quantification of system residual need for resources, and (d) evaluation of the cost-effectiveness of resources alternatives with different operating attributes to meet residual system needs.

Traditional resource planning methods have used reserve margin metrics and targets, expressed as a percentage of forecast electric demand, to ensure that enough capacity is procured and available for operating the system. In the past, because of the small amounts of renewable resources in the system, the uncertainty and intermittency of generation like wind and solar was dwarfed by the uncertainty in electric load. Also, in the past, conventional resource additions provided the operating flexibility required by the uncertainty and intermittency of electric load.

SB 96 requires the Commission to ensure that the research parameters reflect a new contribution to cyber security and grid integration and that there is not a duplication of research being done by other private and governmental entities. Although the California Independent System Operator, the California



Energy Commission, and others have invested in efforts to develop new stochastic approaches to estimate the residual need for flexible resources, these approaches require further examination and development before the methodology and models built based on these approaches are ready for use in resource planning or policy decisions. In particular, this research project is targeting potential breakthroughs to determine:

- Weather uncertainty effects on customer load and renewable generation;
- The electric grid’s operational flexibility requirements;
- Operating limits of the existing or planned grid to integrate additional amounts of intermittent renewable generation; and
- Additional resources and cost to integrate additional renewable generation.

These breakthroughs would significantly enhance existing planning methodologies and models to facilitate the assessment and implementation of future energy policy initiatives and help achieve California’s ambitious environmental goals.

## 2.d. Expected Budget and Timelines for Concluding the Research Projects

The cyber security research project will be executed over a three-year period and the grid integration project will be executed over two years. In both cases, the R&D effort and the expected outcomes are needed by the Utilities as soon as possible. The Utilities believe this is the best and most efficient use of the R&D dollars from a time sequenced perspective and well under the five-year plan as adopted in SB 96 and the original CPUC decision. The Cyber Security Machine to Machine Automated Threat Response Project is projected to spend \$33 million over three years and the Grid Integration Flexibility Metrics and Standards Project is projected to spend \$2 million over two years. The following tables summarize the forecasted spending for these two projects. Any new cyber security or grid integration research projects would be subject to Commission approval via a separate advice letter.

### Cyber Security Machine to Machine Automated Threat Response: Estimated Project Costs

Year 1	Year 2	Year 3	Year 4	Year 5	Total
\$14.5M	\$11.2M	\$7.3M			\$33M

### Grid Integration Flexibility Metrics and Standards: Estimated Project Costs

Year 1	Year 2	Year 3	Year 4	Year 5	Total
\$1.2M	\$0.8M				\$2M

### **3. Conclusion**

This Joint Utility Report describes the scope of the CES-21 Program, which will leverage the relationship between the Utilities, in concert with LLNL, as well as potential partnerships with other DOE national labs, academia, and industry partners to develop the automated response capabilities needed to protect the state's critical infrastructure against cyber-attacks and to advance grid integration capabilities to meet California's energy policy objectives.

For cyber security, the ability to observe and react to threats more rapidly than an attacker will significantly enhance the system's ability to survive an attack. The advancement in cyber technology will enable the Joint Utilities to identify and take action on advanced cyber threats before they impact California's critical infrastructure.

For grid integration, the ability to improve the representation of weather uncertainty and to quantify the electric grid's operational flexibility requirements, operating limits, and additional resources and costs needed to integrate additional intermittent renewable generation will significantly enhance the existing planning methodologies and models and will facilitate the assessment and implementation of California's future energy policy initiatives.

**PG&E Gas and Electric  
Advice Filing List  
General Order 96-B, Section IV**

AT&T	Douglass & Liddell	Occidental Energy Marketing, Inc.
Alcantar & Kahl LLP	Downey & Brand	OnGrid Solar
Anderson & Poole	Ellison Schneider & Harris LLP	Pacific Gas and Electric Company
BART	G. A. Krause & Assoc.	Praxair
Barkovich & Yap, Inc.	GenOn Energy Inc.	Regulatory & Cogeneration Service, Inc.
Bartle Wells Associates	GenOn Energy, Inc.	SCD Energy Solutions
Braun Blaising McLaughlin, P.C.	Goodin, MacBride, Squeri, Schlotz & Ritchie	SCE
CENERGY POWER	Green Power Institute	SDG&E and SoCalGas
California Cotton Ginners & Growers Assn	Hanna & Morton	SPURR
California Energy Commission	In House Energy	San Francisco Public Utilities Commission
California Public Utilities Commission	International Power Technology	Seattle City Light
California State Association of Counties	Intestate Gas Services, Inc.	Sempra Utilities
Calpine	K&L Gates LLP	SoCalGas
Casner, Steve	Kelly Group	Southern California Edison Company
Center for Biological Diversity	Linde	Spark Energy
City of Palo Alto	Los Angeles County Integrated Waste Management Task Force	Sun Light & Power
City of San Jose	Los Angeles Dept of Water & Power	Sunshine Design
Clean Power	MRW & Associates	Tecogen, Inc.
Coast Economic Consulting	Manatt Phelps Phillips	Tiger Natural Gas, Inc.
Commercial Energy	Marin Energy Authority	TransCanada
Cool Earth Solar, Inc.	McKenna Long & Aldridge LLP	Utility Cost Management
County of Tehama - Department of Public Works	McKenzie & Associates	Utility Power Solutions
Crossborder Energy	Modesto Irrigation District	Utility Specialists
Davis Wright Tremaine LLP	Morgan Stanley	Verizon
Day Carter Murphy	NLine Energy, Inc.	Water and Energy Consulting
Defense Energy Support Center	NRG Solar	Wellhead Electric Company
Dept of General Services	Nexant, Inc.	Western Manufactured Housing Communities Association (WMA)
Division of Ratepayer Advocates	North America Power Partners	