

McMillan, Acquanette (Netta)

From: Yadi
Sent: Monday, May 19, 2025 2:41 PM
To: PublicComment-AutoResponse
Subject: Public Comment - Pasadena City Council Meeting 05/19/2025
Attachments: Public Comment - Pasadena City Council - 05-19-25 AMI.pdf

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Hi,

Please find attached my public comment for the May 19, 2025 Pasadena City Council Meeting, agenda item 1. Advanced Meter Infrastructure (AMI) Project Management Services.

Thanks,

Yadi
(Attachments: 1)

AMI System Security - Department of Energy¹

STAKEHOLDER	SECURITY CONCERN
Residential Customer	Privacy
Utility Operator	Integrity of information and system control
Regulators	Integrity of system and compliance with regulations
Telecom Provider	Compliance with contractual obligations and regulations

Table 10 – Stakeholder Security Concerns

Privacy and Cybersecurity

The staff reports rates that “a multi-department selection team of 11 City staff members completed the [AMI RFP] evaluation”

1. Did the City staff team evaluate AMI cybersecurity and privacy concerns?
2. In what ways is the City addressing cybersecurity and privacy issues with AMI use?
3. Will the City obtain consumer consent to share data with third parties? Will consumers have the option to opt out of the sharing of their data?
4. What are the costs and life expectancy of the meters and related communication equipment and software, the reliability/resilience benefits, and justification of the benefits and costs?
5. Are there data governance plans or appropriate changes to data architecture and a comprehensive master data management agreement that address concerns?

According to research and historical data, “AMI’s data storage and communication method make the AMI system more vulnerable to different threats and cyber-physical attacks.”²

The ACEEE (American Council for an Energy-Efficient Economy) states the need to “ensure that the investment has adequate cybersecurity protections, that customer privacy is protected, and that utility costs may be substantial while customer benefits may not be equitable across a customer class.”³

It is high time the City implements a comprehensive privacy program...for our safety and security.

Yadi

Pasadena City Council

May 19, 2025

1. Advanced Meter Infrastructure (AMI) Project Management Services

¹https://www.energy.gov/sites/prod/files/oeprod/DocumentsandMedia/14-AMI_System_Security_Requirements_updated.pdf

² <https://link.springer.com/content/pdf/10.1186/s44147-024-00422-w.pdf>

³ <https://pubs.naruc.org/pub/4DE49EE6-1866-DAAC-99FB-B36D6E27919D>