

2020 Surveillance Impact Report Executive Overview

Current Diversion Technologies

Seattle City Light

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Overview

The Operational Policy statements in this document represent the only allowable uses of the equipment and data collected by this technology.

This Executive Overview documents information about the collection, use, sharing, security and access controls for data that is gathered through Seattle City Light’s Current Diversion Technologies (CDT), specifically the **SensorLink TMS (Check Meter Device), SensorLink Amp Fork, and Binoculars / Spotting Scope**. All information provided here is contained in the body of the full Surveillance Impact Review (SIR) documents but are provided in a condensed format for easier access and consideration.

Note: All use of CDT as described in this document and the accompanying SIRs is governed by [SCL Department Policy & Procedure DPP 500 P III-416](#) which contain details on policy and training related to deployment and use of the Current Diversion Technologies.

1.0 Technology Description

Binoculars: The binoculars are standard, commercial-grade, unpowered binoculars. They do not contain any special enhancements requiring power (e.g., night-vision or video-recording capabilities). They are used to read a meter from a distance when the CDT is otherwise unable to access physically the meter for the purpose of inspection upon suspected current diversion. CDT crews may also, in the event they have a report of an aggravated case – where there is an electrical system alteration posing a present danger to the public or the electrical system’s integrity – observe such alterations.

SensorLink Amp Fork: Ampstik is an electrical device mounted on an extensible pole (up to 40’ to 50’) which allows a circular clamp to be placed around the service-drop wire that provides electrical service to a customer location via its City Light-provided meter. The device then displays instantaneous readings of the amount of electrical energy (measured in amperage, or “amps”) that the CDT may compare against the readings displayed on the meter, allowing them to determine if current is presently being diverted.

SensorLink TMS (Check Meter Device): The SensorLink TMS (Check Meter Device) measures the amount of City Light-provided electrical energy flowing through the service-drop wire over time, digitally capturing the instantaneous information on the device for later retrieval by the CDT via the use of a secure wireless protocol. The TMS device is housed in a black, weatherproofed box of approximately four-square inches, with a City Light inventory control number on the outside for identification by City Light line crews. These are typically deployed on the electric pole, adjacent to the transformer, from one week to one month, depending on the specific case need and crew availability.

2.0 Purpose

Operational Policy:

Per [Department Policy & Procedure DPP 500 P III-416](#) section 1.1, in support of [SMC 21.49.100](#): To establish procedures for preventing, detecting, reporting, investigating, and correcting illegal, unauthorized, or inadvertent diversions of electric current and recovering lost revenue and costs from such diversions.

The Current Diversion Team (CDT) crew uses the described technologies to inspect meters and other implicated electrical infrastructure at a distance. If a determination of diversion is sustained, data may be used to respond to lawful requests from the proper law enforcement authorities for evidence for recovering the value of the diverted energy.

3.0 Data Collection and Use

Operational Policies:

Per [Department Policy & Procedure DPP 500 P III-416](#): The Current Diversion Coordinator or a designated current diversion investigator investigates suspected current diversion as soon as it is practical to do so after receiving a report of suspected current diversion.

Per [Department Policy & Procedure DPP 500 P III-416](#): The Current Diversion Coordinator or a designated current diversion investigator determines how many kilowatt hours or kilowatts of demand have been diverted and who shall be billed for them.

Per [Department Policy & Procedure DPP 500 P III-416](#): The CDT work unit investigating the diversion forwards its Investigation/Correction Cost Form to the Current Diversion Coordinator, who determines the total amount to be billed for investigation and correction costs. [SMC 21.49.130\(E\)](#) designates allowable billing provisions.

The CDT only investigates specific meters, with the approval of the Current Diversion Coordinator, and other implicated electrical equipment at locations previously identified and properly documented as sites of suspected current diversion.

4.0 Data Minimization & Retention

Operational Policy:

Data will be retained per City Light records retention schedules.

The CDT only investigates specific meters and other implicated electrical equipment at locations previously identified and properly documented as sites of suspected current diversion.

5.0 Access & Security

Operational Policy:

Records of inspections facilitated by use of current diversion technologies are stored in a private folder on City Light’s digital file locations, accessible only by CDT members and management.

Access

CDT members, who are journey-level electrical workers trained in the proper use this equipment, may collect these data. These consist of meter reads and, in certain instances, other implicated electrical equipment that poses a present danger to the public or the electrical system integrity.

The limited number of this equipment and of CDT members makes the routine tracking of the straight-forward. Equipment is issued to CDT members, and stored in their official vehicles. These vehicles are operated, locked, and stored in accordance with Utility security procedures. Equipment serial numbers are recorded and the CDT member to whom they are assigned, as well as their deployment status, are logged.

Security

CDT members are trained in how to store information in private folders on City Light’s digital storage locations, in addition to the general privacy and security training required by Seattle IT.

6.0 Data Sharing and Accuracy

Operational Policy:

Data is collected and maintained for Seattle City Light use and may only be shared with outside entities for the purposes of law enforcement or legal action by the relevant jurisdictional authority. This policy is formally laid out in [Seattle City Light Department Policy & Procedure DPP 500 P III-416](#).

Reports from observations facilitated by the use of current diversion technology may be shared with other parties in two instances, both of which are public entities. These are (1) when a determination is made that current diversion has taken place, in which case a valuation of the stolen energy is sent to the customer billing division of City Light for “back-billing” to the customer for cost recovery, and (2) when police investigators and/or prosecutors require evidence for further proceedings in complex or aggravated cases, as when large sums of energy have been diverted/stolen, or where there is a safety risk to the public.

When a report is sent to law enforcement, it does not include power consumption information. Law enforcement then relies upon the Public Disclosure Law to request power records, if they decide to do so, and City Light would provide that information pursuant to that request. This may be effectuated either by a subpoena or by a request from law enforcement based upon probable cause and pursuant to the Washington Public Disclosure Law (see RCW 42.56.335).

Per City of Seattle’s Privacy Statement, outlining commitments to the public about how we collect and manage their data: *We do not sell personal information to third parties for marketing purposes or for their own commercial use.* The full Privacy Statement may be found [here](#).

7.0 Equity Concerns

Operational Policy:

All customers shall receive uniform consideration and courtesy in all matters involving actual or suspected current diversion.

[Seattle City Light Department Policy & Procedure DPP 500 P III-416](#) provides that “all customers shall receive uniform consideration and courtesy in all matters involving actual or suspected current diversion.” City Light aims to ensure that the enforcement mechanisms are equitable, in that they should be not only unbiased but also equitably enforced.

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