

Memorandum

To: Stakeholder Advisory Committee

From: Sorana Ionescu, Director, Smart Metering

Date: May 5, 2016

Subject: IESO Business Update – SME Licence Order Working Group

The Smart Metering Entity (SME) Licence Order Working Group was initiated to respond to the Ontario Energy Board's (OEB) January 26, 2016 Order (File Number EB-2015-0297 – Licence Renewal and LDC Agreement – FINAL Order). The Order extended the SME's licence and the SME/LDC Agreement to December 31, 2016 and requires the SME to file a plan to implement the following details with its next licence renewal application:

“Effective January 1, 2017, the SME shall collect the following information associated with each meter (modified where necessary to sufficiently render it non-personal information): a. The postal code; b. The distributor rate class; c. The commodity rate class; d. Occupant change data. The next SME licence application (Fall 2016) will also be required to address the Implementation Plan with respect to third party access to this enhanced SME data, including an assessment of the cost implications.”

The Working Group consists of 13 Local Distribution Companies and Observers (including Ontario Energy Board, Ministry of Energy, Electricity Distributors Association, Enbridge and Union Gas), with the Information and Privacy Commissioner (IPC) also closely involved in the project in a consultative capacity.

The SME Licence Order Working Group has had three meetings to date. Terms of reference have been approved <http://www.ieso.ca/Documents/consult/SME/SME-Terms-of-Reference.pdf> and a web page has been established for the posting of meeting materials: <http://www.ieso.ca/Pages/Participate/Stakeholder-Engagement/Working-Groups/Smart-Metering-Entity-SME-Licence-Order-Working-Group.aspx>

At the advice of the IPC, the IESO has retained a privacy consultant to provide support with risk analysis for re-identification of individuals within the smart metering data being collected. This analysis will be used as a basis for the collection of the data in a manner that renders it

non-personal. The initial phase of this work will help the IESO with the development of a conceptual re-identification risk determination, which will result in a report expected by end of May. Additional work may be required, to validate the first phase results using actual data sets. On third party access, the Working Group has formulated a preliminary classification (as shown below) to support the risk assessment analysis of the privacy consultant. The Working Group will also consider the recommendations on a Framework for Third Party Access captured in the Final Report of the Foundation Working Group.

POTENTIAL CATEGORIES FOR THIRD PARTY ORGANIZATIONS		
USER GROUP A	USER GROUP B	USER GROUP C
<i>Criteria: Organizations that currently have access to this information or have/would have the legal right to collect/use it for their mandate.</i>	<i>Criteria: Federal, Provincial or Municipal organizations requiring this information to better carry their activities and/or with non-for-profit interest for the data and/or with low risk of data re-identification.</i>	<i>Criteria: Organizations with commercial interest for the data set or with access to other data that elevates the risk of re-identification or represents a significant un-known risk.</i>
Ontario Energy Board	Crown Corporations (e.g. Statistics Canada)	Vendors
Ministry of Energy	Academia/Research Institutions	Retailers
IESO (for areas outside of the SME)	Municipalities	International Organizations
LDCs for information pertaining to their customers	Regional Planners	Other Market Participants
	Municipal Property Assessment Corporation - MPAC	Other Private Organizations
		LDCs for information pertaining to other LDC's data
		Transmitters
		Conservation Authorities (e.g. Toronto & Region Conservation Authority)

The IPC will continue to provide ongoing guidance on the factors to consider when determining if postal codes are personal information, the changing nature of information over its lifecycle, third party access and the risk of identification/re-identification, and other related IPC considerations.

Next Steps for SAC

- The IESO will present the progress of the Working Group engagement at the next Stakeholder Advisory Committee meeting in August including an update on the work to date and considerations on third party access.