

# Smart Metering Entity (SME) Licence Order Working Group

Stakeholder Advisory Committee (SAC)

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August 17, 2016

# Agenda

- **Background**
- **Project Timelines**
- **Communications Calendar**
- **Additional Data Collection**
- **Third Party Access Implementation Plan**

# Background

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:

- I. *“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.*
  
- II. *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.”*

# Background (cont'd)

- The Working Group consists of 13 Local Distribution Companies and Observers (including the Ontario Energy Board, Ministry of Energy, Electricity Distributors Association, Enbridge and Union Gas), with the Office of the Information and Privacy Commissioner (IPC) closely involved in the project in a consultative capacity.
- The SME Licence Order Working Group has been meeting at least once a month, meeting materials are posted on IESO's public website:  
<http://www.ieso.ca/Pages/Participate/Stakeholder-Engagement/Working-Groups/Smart-Metering-Entity-SME-Licence-Order-Working-Group.aspx>
- The work effort focused on two main streams:
  - Defining the format of the additional data to be collected as of January 1<sup>st</sup> 2017 to meet the analytical needs, while in compliance with all privacy requirements
  - Designing the technical specifications and implementation of the new code into the MDM/R production environment, as seamlessly as possible to the LDCs and with no impact on the core MDM/R function

# Project Timelines

Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17
Early meetings with various groups	Working Group Formed and Kick off Meeting	Ongoing Working Group Meetings									
Privacy vendor selection and contract negotiations		Conceptual Re-Identification Risk Determination Analysis Report received June 2016		Development of 3 <sup>rd</sup> Party Access Framework			SME License Application with 3 <sup>rd</sup> Party Access Plan	Documentation & Training		Go Live	
Technical Scoping & Requirements		Development and SME internal testing of the new MDM/R code			New MDM/R code deployed to MDM/R Sandbox environment LDCs' testing		New MDM/R code deployed to MDM/R Production environment with Validation for new SDP Parameters excluding Postal Code				

# Communications Calendar

Communications Channel	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17
Working Group Meetings	✓	✓	✓	✓	✓						
IESO Stakeholder Engagement Website		✓	✓	✓	✓						
IESO Stakeholder Advisory Committee			✓			✓					
IESO Webinars			✓	✓	✓						
IESO LDC Event											
EDA Website / eBlast		✓	✓	✓							
EDA LDC Surveys		✓									
SSC Meetings and LDC Open Calls	✓			✓							
MDM/R Technical Panel Meetings					✓						
GO LIVE Communication											



# I. Additional Data Collection

# Defining the Format of New Data Collection

- At the advice of the IPC, the IESO has retained a privacy consultant, Privacy Analytics Inc., to provide support with the risk analysis, by performing a conceptual re-identification risk assessment for the data set that will exist in the MDM/R once the OEB order is implemented and determine an appropriate risk threshold.
- Based on the Consultant's recommendations and discussions with the IPC, the IESO will implement the following data collection process:
  - collect the 6 character Postal Code
  - generalize the occupancy change date to just the year
  - collect the Distributor rate class and Commodity rate class
  - mask the Premise Address and City fields
- **This combination of information collection best supports data analytics and meeting the set threshold for the risk of re-identification**



# Technical Implementation Next Steps

- Privacy report finalized and recommendations shared with IPC and stakeholders
- Recommendations incorporated in technical specifications and code design
- Code development completed and SME / LDCs testing activities underway
- Transition plan for LDCs submission of synchronization files planned throughout Q3/Q4 2016
- GO LIVE for additional data collection as planned (Jan 1<sup>st</sup> 2017)

# II . Third Party Access Implementation Plan

# Development of SME's Implementation Plan

- The **Implementation Plan** development is guided by:
  - Best Practices in Third Party Access from other industries, as applicable
  - Input from stakeholders
  - Recommendations from privacy consultant and the Office of the Information Privacy Commissioner
- Will be filed with the Licence renewal application submitted to the OEB this fall

# Examples of Third Party Use and/or Access



USE

ACCESS



# SME Guiding Principles for Third Party Access

## Purpose and Governance

- Overarching objective of adding **value to the electricity Customer and the System**
- Maintain perspective and define the project with the **long term in mind**
- Use a **phased-approach** to implementation

## No impact to Core Functions

- No impact to current **MDM/R billing** functions
- No impact to current MDM/R **operational reporting**

## Privacy by Design

## Operational Effectiveness

- Leverage use of **existing systems** as possible before building new
- Add **resiliency** to systems as needed
- Create **efficiencies** and **minimize costs**

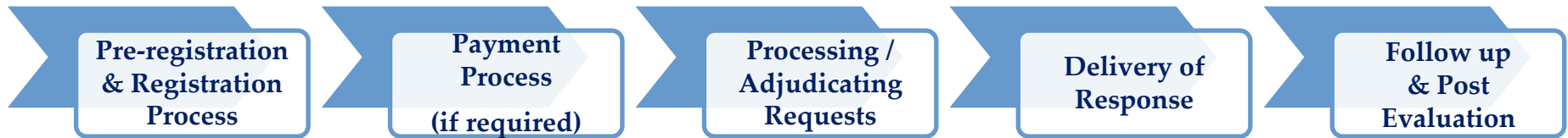
## Data Stewardship

- Commitment to **data quality**
- Commitment to **high service standards**
- Effective **oversight** of the data processes
- **Lifecycle approach** to data management

# Key Elements of the SME's Implementation Plan

- The **Implementation Plan** will contain:
  - Guiding principles
  - Governance framework, project scope
  - Processing / adjudication processes, service agreements
  - Types of 3<sup>rd</sup> party access requests with business processes
  - Project plan, implementation phases, activities & timelines
  - Draft Legal Agreement(s)
  - Post implementation evaluation
  - Costing considerations

# Third Party Access Key Operational Processes



- Key considerations when designing each of the processes:
  - Complies with the privacy recommendations provided by the consultant
  - Designed to protect the security of the data
  - Automated & manual controls are in place
  - Traceable and auditable
  - Balance between user benefits/requirements and implementation costs

# Draft Stages for Project Implementation

Jan 1<sup>st</sup> 2017 – Starting  
Collection of  
Additional Data Fields

2017

2018

2019+

## STAGE 1

Q1/ Q2 Privacy consultant  
to validate risk profiles and  
finalize recommendations,  
by running “real-data”  
scenarios

## STAGE 2

Q3/Q4 Select third  
party access Pilots  
to refine processes

## STAGE 3

Opening broader access to  
Electricity Consumption  
Data for Third Parties



# The Enhanced SME Data Set

Data Element	Comments
Consumption Data	Hourly data; aggregated as required
Location by Postal Code	6 or less characters based on risk assessment
Distributor Rate Class	As specified in a data request
Commodity Rate Class	As specified in a data request
Validation of Occupant Status	Consumption of premises with an occupant change for a specific year to be excluded or included as specified in a data request
Number of Premises	Number of premises used to fulfill the data request. Data may not be provided if a data request involves <X number of premises

Other data elements may be used to retrieve the requested data but would not be part of a response (e.g. ORG\_ID)

# Examples of valid Data Requests

- Aggregated daily consumption of all Residential-Regular service locations with TOU pricing in Forward Sortation Area “M5H” during the year 2015.
- Individual daily consumption of Residential-Seasonal service locations in Forward Sortation Area “P1P” for the months of June, July, August and December, January, February during the year 2015.\*
- Aggregated hourly consumption of all Small General Service locations with Tiered pricing throughout the province for the months of July 2015 and July 2016 with no occupancy change in 2015 and 2016.

\* Assumption: There are more than 5 Residential Seasonal locations in P1P

# Examples of invalid Data Requests

- Hourly consumption of each Residential-Regular service location on Toronto's Bridle Path with TOU pricing during the year 2015.
- Hourly consumption of each Small General Service location, in Postal Code "M5H 1T1", which had an occupancy change in 2015.\*
- Hourly consumption of the premise at 111 Wellesley St W, Toronto
- Hourly consumption of each Residential-Regular service location with a demand > 15kW in Postal Code "M5H 1T1"

\* Assumption: There are only 2 Small General Service locations in M5H 1T1

# Summary & Next Steps

- Continue discussions with other organizations to learn about access models and implementation best practices
- Further stakeholder input and development of the implementation plan with more detailed processes, draft legal agreements (mid to end August)
- Plan refinement and IPC review (by mid September)
- SME to file Licence Renewal application, including Third Party Access Plan, in the Fall 2016