

Foundation Project

Response to Stakeholder Feedback: Foundation Project

Following publication of the draft Stakeholder Engagement Plan, Terms of Reference and Call for Nominations for the Foundation Working Group, the IESO received feedback in two categories:

- Feedback pertaining to the Working Group itself; and
- Broader feedback related to the overall Foundation project.

The IESO [posted](#) responses to feedback concerning the Working Group on April 2, 2015.

Below are the IESO's responses to feedback from stakeholders on the broader Foundation Project itself. Responses are grouped thematically on issues related to **Data Enhancement** and **Access**.

Data Enhancement

Feedback

An analysis of the LDC impact and costs for providing new data sets should be completed.

IESO Response

The costs and impacts to the LDCs for implementation of the Foundation recommendations will depend on a number of factors, including:

- 1) *any geo-location and customer identification data determined to be needed to enhance the MDM/R's energy consumption data;*
- 2) *how and where any such additional data will be coupled with the MDM/R's energy consumption data; and,*
- 3) *use of existing interfaces and data fields in the MDM/R for supporting geo-location and customer identification data.*

Consideration of the extent of these LDC costs and impacts will be part of the Foundation project.

Feedback

What is the intended scope of data to be captured within the MDM/R; does it include non smart meter data e.g. interval meter data, weather, water, etc.?

IESO Response

The scope of the Foundation project will only consider the areas of geo-location and customer identification data, as it relates to the MDM/R's energy consumption data. Information such as interval/C&I meter data, weather data, water or gas data are not part of the Foundation project's work. Such considerations of additional data sets are part of the Ministry of Energy's MDM/R Data Access Platform (MDAP) business case development project.

Feedback

There should be solid, compelling uses cases for each new data elements.

IESO Response

Enhancing the value of the existing interval energy consumption data falls within the role of the IESO/SME established by the Ministry and the OEB. The IESO will work with the Foundation Working Group and stakeholders to ensure the data elements identified clearly support the stated objectives of this initiative

Feedback

The privacy implications for customers and liability to the LDC should be identified.

IESO Response

The privacy implications for customers' personal information is something that has been identified and will be considered in the context of this engagement. We will also be inviting LDCs to share concerns about any additional liability they may have and steps they may take to mitigate such concerns.

Feedback

The ongoing process for the evaluation and enhancement of future data augmentation should be identified.

IESO Response

The development of a business case associated with considering an investment in MDAP is exemplary of how future data augmentations to enhance the value will be undertaken.

It should be noted that, should there be a need for modifications involving the MDM/R, there is a developed, stakeholdered and operational Change Management process for evaluating such changes that includes the Smart Metering Entity and LDCs.

Feedback

As a principle: if rate payers are to fund any part, then the benefit to the rate payer should be clearly articulated.

IESO Response

The focus of this project is on the identification of additional data to enhance the value of the MDM/R's energy consumption data and the development of policy related to access to data. Consideration of the extent of these LDC costs and impacts will be part of the Foundation project.

Access

Feedback

Third parties should pay for their access to the data.

IESO Response

The Foundation project is not implementing any third party access to the data. It is only recommending additional data in limited areas and developing a set of rules around third party access. Whether and how third parties should

pay for their access to the data will be a consideration incorporated into the design of a cost recovery model when third party access is implemented.

Feedback

Will third parties have access to customer identifiable information?

IESO Response

It is part of the mandate of the Foundation project to determine what access, if any, third parties will have to customer identifiable information. Should third party access be granted, it will be in compliance with all applicable privacy laws and regulations. Also, the Foundation project will develop rules to safeguard this information and no third party access will be permitted until those rules, along with the associated processes and procedures have been finalized, reviewed by all necessary parties and the systems supporting such access have been developed and tested.

Feedback

Customers need to maintain control of their data and have a process of opting-out.

IESO Response

Customers' privacy has been identified as a significant item to be considered in the context of this engagement. While the SME has been given the mandate to create a framework to allow access to the MDM/R data, it will do so in compliance with all applicable privacy laws and regulations. The office of the Ontario Information and Privacy Commissioner has been invited to participate in this Foundation Working Group. With the IPC, together we will work to ensure appropriate protections are in place to safeguard customers' personal information.

Feedback

Who is the custodian of the data? IESO? SME? Is the IESO a third party in this process?

IESO Response

The IESO was appointed as the SME (they are one in the same). The IESO/SME is the custodian of the data in the MDM/R. LDCs are also custodians of their customers' data. As such, neither the IESO nor the LDCs are third parties in this process for the data of which they are the custodians.

Feedback

Any potential overlap between this initiative and the MoE/MaRS Green Button initiatives should be identified and rationalized.

IESO Response

The Foundation project and its scope were discussed on the March 26, 2015 conference call/Webinar. The Foundation project does not overlap but is complementary to related projects in this space. In addition, the IESO will ensure this project and its recommendations are confined to the scope identified in the Stakeholder Engagement Plan and Terms of Reference documents.